



UNITED STATES DEPARTMENT OF EDUCATION

June 8, 2018

Mr. Alex Elson, Esq.
Ms. Martha Fulford, Esq.
National Student Legal Defense Network
alex@nsldn.org
martha@nsldn.org

RE: FOIA Request No. 18-01346-F

Dear Mr. Elson and Ms. Fulford:

This letter is a final response to Mr. Tariq Habash's request¹ for information pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, dated March 21, 2018 and received in this office on that date. Your request was forwarded to the appropriate office to search for documents that may be responsive to your request.

You requested the following:

- (a) All documents constituting the "draft analysis," "analysis," "staff draft analysis," and/or "draft staff analysis," as those phrases were used by AUSA Doud, Mr. Bounds, and Ms. Mangold, that were provided to ACICS between March 1, 2018 and the date of this request.
- (b) All documents sufficient to show the dates on which the "draft analysis," "analysis," "staff draft analysis," and/or "draft staff analysis," as those phrases were used by AUSA Doud, Mr. Bounds, and Ms. Mangold, were provided to ACICS.

Attached to this e-mail are 244 pages of documents responsive to your request. However, certain information has been withheld according to FOIA Exemption 6, specified below:

- Records or portions of records relating to personal information is exempt pursuant to 5 U.S.C. § 552 (b)(6) of the FOIA. Disclosure of this information would constitute a clearly unwarranted invasion of personal privacy.

Additionally, the Office of Postsecondary Education has elected to provide the following additional information relevant to the records requested:

The requested Draft Staff Analysis was provided by the Department's Accreditation Group staff to ACICS as part of the routine pre-decisional request for additional information or evidence. The recognition process begins with an initial review of the accrediting agency's petition for recognition, the results of which are provided to the agency in draft form to afford the agency the opportunity to correct errors of fact, point out evidence included in the petition that the analyst may have overlooked, or to provide additional evidence in response to the staff analyst's

¹ Although Mr. Habash submitted the FOIA request, in your email to AUSA Casey Lee, you requested that the response to FOIA Request 18-01346-F be sent to you.

requests. It is typical for a draft staff analysis to include findings or deficiencies that are easily resolved by the agency. Often the deficiency may be corrected by submitting updated documents because the data in the petition was outdated by the time the analyst reviewed it. In other cases, a further explanation by the agency will be sufficient to resolve the initial finding of non-compliance with a particular recognition criterion.

The applicable regulations afford the agency an opportunity to respond to the analyst's draft analysis, and additional exchanges may take place until the analyst has sufficient evidence to support his or her findings and recommendations. Until such time that the Department issues its final staff analysis, the agency and the staff are permitted to engage in dialogue and additional document submissions to resolve any outstanding concerns. In some instances, the draft staff analysis identifies policies or procedures that the Department would like the accreditor to update, but given the time it takes for an accreditor to adopt and implement a policy change, it is unlikely that the agency will have sufficient time to provide evidence that it has applied particular policies demonstrating compliance with the recognition criteria. In many cases, an accreditor will not have the occasion to enforce a new policy for many years, especially if the policy relates to modalities or substantive changes that are rare among its member institutions. The Department may not finalize a negative finding in the event that an accreditor has not had the need or opportunity to implement a particular policy during the review period, but staff have been inconsistent in applying this rule. Therefore, findings of a lack of evidence in a draft staff report can be resolved, in many cases, by explaining that the institution has not had the opportunity to implement the policy due to the timing of its institutional reviews. It is not uncommon for agencies to resolve long lists of negative draft findings during this exchange, resulting in findings of compliance by the staff analyst.

In the case of the ACICS draft staff analysis issued in response to ACICS's 2017 petition for initial recognition, the review and response process was suspended before ACICS had the opportunity to respond to the draft and before the staff reached a final recommendation. Shortly after releasing the draft staff analysis to ACICS, the U.S. District Court for the District of Columbia ruled that the Department violated the Administrative Procedure Act in deciding to withdraw recognition from the agency in 2016. The Court therefore invalidated that decision and remanded the matter to the Secretary.

The Court's decision had the effect of reinstating ACICS's recognition. Because there has been no final decision on ACICS's recognition petition from 2016, ACICS's status as a federally recognized accrediting agency has been restored effective as of December 12, 2016. ACICS will remain in that status until the Secretary reaches a final decision on ACICS's recognition petition from 2016.

Accordingly, ACICS's 2017 petition for initial recognition was rendered moot and, therefore, withdrawn. For that reason, ACICS never responded to the draft staff analysis, and the staff never produced a final analysis to submit to ACICS and NACIQI for review.

The Department wishes to reiterate that the draft staff analysis is an incomplete, pre-decisional document that may include errors of fact or omissions on the part of staff analysts who, in this case, did not benefit from receiving a response or additional information from the Agency. It

will not be considered by the Department in any future evaluations or assessments, including the review of the 2016 decision because the criteria for initial recognition and those that were the subject of the 2016 decision are not the same.²

As this request is currently in litigation, if you have any questions regarding the Department's response, please contact AUSA Casey Lee at casey.lee@usdoj.gov.

Sincerely,

/s/

Jill Siegelbaum
General Attorney

Enclosure

² For your convenience, a header to this effect has been applied to the responsive records, as have Bates numbers for ease of review. Please note that neither the header nor the Bates numbers had been applied to the responsive records as of the date of your request.

**DRAFT ANALYSIS FOR
ACICS
Meeting Date: 05/2018**

Type of Submission: Initial Petition

Current scope of recognition: Not applicable, as the agency is applying for initial recognition.

Staff Recommendation:

Proposed recommendation if the noncompliance issues below are not corrected: deny initial recognition.

Issues or Problems:

It does not appear that the agency meets the following sections of the Secretary's Criteria for Recognition. These issues are summarized below and discussed in detail under the Summary of Findings section.

- The agency must provide an updated directory of accredited institutions. [§602.11]
- The agency must provide additional information and documentation to demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by educators, licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions within the agency's jurisdiction prepare their students. [§602.13]
- The agency must demonstrate it meets the "separate and independent" requirements. [§602.14(a)]
- The agency must provide information and documentation that it requires that at least one-seventh of an appeals panel consists of representatives of the public. The agency must also provide documentation of the implementation of the council member nomination, election and selection process, outlined in the agency's bylaws. It must also provide documentation of the appointment process of the appeals panel members by the council. [§602.14(b)]
- The agency must provide documentation to demonstrate that the staffing is sufficient to carry out all accrediting functions and responsibilities. The agency must also provide documentation to demonstrate that the leadership team is sufficiently familiar with the Secretary's Criteria for Recognition to meet its requirements. It must provide an update of the 2018 budget and submit the 2017 audited financial statements for the agency. [§602.15(a)(1)]
- The agency must provide documentation to demonstrate that the council composition meets the requirements of the agency's bylaws. The agency must also provide information and documentation concerning the executive committee, to include its function and composition. It must provide the current roster of council members and appeals panel pool members to demonstrate compliance with this section. The agency must provide information and documentation on the qualifications of council members to review and evaluate programs offered via distance education. The agency must also provide documentation of all training provided to council members, as well as any training provided with regards to the review of programs offered via distance education. It must provide documentation of any training provided to evaluators with regards to the review of programs offered via distance education. The agency must provide documentation of the evaluation, selection and training of IRC members. [§602.15(a)(2)]
- The agency must provide the current roster of council members and appeals panel pool members to demonstrate compliance with this section. The agency must also provide additional information and documentation regarding the executive committee and the IRC to demonstrate compliance with this section. It must provide additional information regarding the required representation on evaluation teams. [§602.15(a)(3)]
- The agency must provide the current rosters of the council and appeals panel pool to demonstrate compliance with this section. The agency must also provide additional information and documentation regarding the executive committee. It must provide documentation that it has vetted the public representatives on the council to ensure they meet the requirements of the agency's definition of a public representative. [§602.15(a)(5)]
- The agency must provide the written policy regarding the assignment of institutions to the IRC members and documentation to demonstrate the use of recusal by the IRC to demonstrate implementation of its conflict of interest policy. The agency must also provide documentation on the use of recusal by the appeals panel pool and evaluators. It must provide documentation on how the agency verifies application of its conflict of interest policy with its administrative staff. The agency must submit the policy that controls against conflict of interest for consultants and contractors. The agency must also provide documentation that an institution has availed itself of the right to request replacement of a site visitor and that the agency provided a replacement. It must provide information and documentation on the existence and activities of its Board of Ethics. [§602.15(a)(6)]
- The agency must provide information & documentation on how it determined that the use of its student achievement rates are sufficiently rigorous to ensure that the agency is a reliable authority regarding the education provided by the institutions it accredits. It must also provide an update regarding its inclusion of standards & benchmarks for graduation rates at the program- & institution-levels. It must provide information & documentation concerning its review of placement rates for institutions with significant international student populations, and State licensing examination rates. It must provide documentation of implementation of its Placement Verification Program. It must also provide documentation to demonstrate systematic implementation and consistent & effective application of its student achievement standards. It must provide information & documentation on the guidance provided to on-site teams to review institutional compliance with the student achievement standards. [§602.16(a)(1)(i)]
- The agency must update its Accreditation Criteria and all other publications regarding the status of the agency's review of doctoral degree programs. [§602.16(a)(1)(ii)]
- The agency must provide additional documentation to demonstrate consistent application of the agency's faculty standards. The agency must also provide documentation of the review of the faculty for programs offered via distance education, if those programs are to be included within the agency's scope of recognition. [§602.16(a)(1)(iii)]
- The agency must provide additional information and documentation on how it reviews its institutions for compliance with its fiscal capacity standards. The agency must also provide additional information and documentation on how it has determined that the use of its fiscal capacity standards and monitoring approaches are sufficiently rigorous. [§602.16(a)(1)(v)]
- The agency must provide documentation of the review of the recruiting, admissions, and advertising for programs offered via distance education, if those programs are to be included within the agency's scope of recognition. [§602.16(a)(1)(vii)]
- The agency must provide information and documentation on the annual review of program lengths required within its Accreditation Criteria. [§602.16(a)(1)(viii)]

DRAFT DOCUMENT - THIS DOCUMENT WAS NOT FINALIZED AND SHOULD NOT BE RELIED UPON AS A STATEMENT OF FACT AND MAY OMIT KEY EVIDENCE AND/OR FINDINGS -- header applied 6/8/18

- The agency must provide additional information and documentation on how it assesses an institution's student complaint policy while on-site, and the guidance provided to site visitors on how to evaluate such compliance. The agency must also provide information and documentation to demonstrate that it assesses an institution's student complaint policy, and whether the nature, substance, or pattern of complaints provides any information relevant to the institution's compliance with the agency's standards or other requirement. [§602.16(a)(1)(ix)]
- The agency must provide information and documentation to demonstrate that the review of an institution's Title IV responsibilities is included within the agency's evaluation process. The agency must also provide documentation that its standards require the submission of information and documentation sufficient to review and make a determination regarding an institution's Title IV record of compliance. [§602.16(a)(1)(x)]
- The agency must provide documentation to demonstrate the review of programs offered via distance education programs against all of the agency's standards. [§602.16(b)(c)]
- The agency must provide documentation that it has an effective mechanism for evaluating an institution's compliance with the agency's standards, to include achieving its stated objectives. [§602.17(a)]
- The agency must revise its documentation concerning its publication of the Department's requirements concerning on-site reviews. [§602.17(c)]
- The agency must provide documentation that it has a policy to provide an assessment of the areas required by this section. [§602.17(f)]
- The agency must provide documentation to demonstrate that the agency requires institutions that offer programs via distance education to have student verification methods in place and processes to protect student privacy. [§602.17(g)]
- The agency must provide information and documentation concerning the waiver of standards. [§602.18(b)]
- The agency must provide additional information and documentation concerning the current use of a Data Integrity Reviewer to support the agency's claim that it has a reasonable basis for determining that the student achievement information the agency relies on for making accrediting decisions is accurate. [§602.18(d)]
- The agency must provide information and documentation concerning the extensions of accreditation grants noted in the agency's Accreditation Criteria. The agency must also provide additional information and documentation concerning the grants of accreditation awarded to institutions that have current or previous compliance issues. [§602.19(a)]
- The agency must provide additional documentation concerning implementation of its Annual Financial Report and Campus Accountability Report to demonstrate that the agency has effective monitoring approaches that enable the agency to identify problems with an institution's continued compliance with agency standards. The agency must provide additional information and documentation concerning the work of the ARIG. [§602.19(b)]
- The agency must provide examples and data from the 2017 annual report to demonstrate compliance with this section. The agency must also provide documentation of implementation of how it monitors overall growth of the institutions it accredits. [§602.19(c)]
- The agency must provide documentation that it monitors the headcount enrollment of each institution it has accredited that offers distance education, and reports an increase in headcount enrollment of 50 percent or more within one institutional fiscal year to the Secretary to demonstrate compliance with this section. [§602.19(e)]
- The agency must provide documentation that it requires an institution to take appropriate action to bring itself into compliance with the agency's standards within a time period that must not exceed the limits in this section, when an institution is not in compliance with any standard. The agency must also provide documentation to demonstrate that it appropriately implements the requirements of this regulation. [§602.20(a)]
- The agency must provide additional information and documentation on how its program of review ensures that the agency examines each of the agency's standards and the standards as a whole. The agency must also provide additional information and documentation on how it involves all of the agency's relevant constituencies in the standards review process and affords them a meaningful opportunity to provide input. [§602.21(a)(b)]
- The agency must provide documentation that it provides notice of proposed changes to all of the agency's relevant constituencies, gives the constituencies opportunity to comment, and takes into account any comments on the proposed changes submitted timely by the relevant constituencies. [§602.21(c)]
- The agency must provide information and documentation on how it ensures ensure that any substantive change to the educational mission, program, or programs of an institution after the agency has accredited the institution does not adversely affect the capacity of the institution to continue to meet the agency's standards. The agency must also provide information and documentation that substantive changes are reviewed and approved by a decision-making body of the agency prior to implementation. [§602.22(a)(1)]
- The agency must provide documentation of the review of direct assessment competency-based programs, if the agency approves such programs. [§602.22(a)(2)(i-vii)]
- The agency must provide additional information and documentation to demonstrate that the agency has procedures that specify an effective date, which is not retroactive, on which a substantive change is included in the institution's grant of accreditation. [§602.22(b)]
- The agency did not provide documentation to demonstrate that its procedures for the approval of an additional location where at least 50 percent of an educational program is offered provides for a determination of the institution's fiscal and administrative capacity to operate the additional location. [§602.22(c)]
- The agency must provide documentation to demonstrate that it conducts a visit, within six months, to each additional location an institution establishes where at least 50% of an educational program is offered. [§602.22(c)(1)]
- The agency must provide any information and documentation with regards to an effective mechanism for ensuring that accredited institutions that experience rapid growth in the number of learning sites maintain educational quality. The agency also must provide documentation to demonstrate compliance with this section. [§602.22(c)(3)]
- The agency did not provide sufficient documentation to demonstrate that it consistently verifies via a site visit that an additional

location has the personnel, facilities, and resources as claimed in its application to the agency for approval of the additional location. [§602.22(d)]

-- The agency must revise its complaint policy to include requirements for a timely review of complaints. The agency must also provide documentation of the review of complaints by the agency's decision-making body. It must provide complete documentation of the review of a complaint against itself. [§602.23(c)]

-- The agency must provide documentation to demonstrate implementation of its policy for the public correction of inaccurate information, as required by this section. [§602.23(e)]

-- The agency must provide information and documentation to demonstrate that has policies and procedures in place to evaluate a teach-out plan to ensure it provides for the equitable treatment of students under criteria established by the agency, specifies additional charges, if any, and provides for notification to the students of any additional charges, for all events noted in Section 602.24(c)(1). [§602.24(c)(2)]

-- The agency must provide information and documentation that it has policies and procedures to require that if ACICS approves a teach-out plan that includes a program that is accredited by another recognized accrediting agency, ACICS will notify that accrediting agency of approval of the teach-out plan, as required by this section. [§602.24(c)(3)]

-- The agency must provide information and documentation to demonstrate that its review and approval of teach-out agreements includes all elements required by this section and meet the agency's requirements. [§602.24(c)(5)]

-- The agency must provide information and documentation that it has a policy to conduct an effective review and evaluation of the reliability and accuracy of the assignment of credit hours for all of its accredited or applicant institutions. [§602.24(f)(2)]

-- The agency must provide information and documentation to demonstrate that it has a policy to notify the Secretary if the agency finds systemic noncompliance with the agency's policies or significant noncompliance regarding one or more programs at the institution related to credit hour assignment. [§602.24(f)(4)]

-- The agency must provide additional information and documentation concerning the implementation of the procedures it uses throughout the accrediting process to satisfy due process. [§602.25(a-e)]

-- The agency needs to provide documentation that its policy clearly identifies all council actions that are eligible for the appeals process. The agency must also provide information and documentation that its hearing and appeals processes occur in a timely manner. It must provide information and documentation to demonstrate that the appeals panel cannot include current members of the agency's decision-making body that took the initial adverse action. [§602.25(f)]

-- The agency must provide documentation to demonstrate that it has a policy that clearly requires the agency to notify the institution in writing of the result of its appeal and the basis for that result. [§602.25(g)]

-- The agency must provide documentation to demonstrate that it provides written notice of positive accreditation decisions to the public no later than 30 days after it makes the decision. [§602.26(a)]

-- The agency must provide documentation that it has a policy to provide written notice of negative accreditation decisions to the Secretary, the appropriate State licensing or authorizing agency, and the appropriate accrediting agencies at the same time it notifies the institution of the decision, but no later than 30 days after it reaches the decision, as required by this section. [§602.26(b)]

-- The agency must provide documentation that it has a policy to provide a written rationale of negative accreditation decisions within 60 days to all entities required by this section. The agency must also provide documentation that no limitation is placed on an institution's ability to make an official comment regarding the decision. [§602.26(d)]

-- The agency must demonstrate that it has a policy regarding the notification of voluntary withdrawals and lapses of accreditation that meet the requirements of this section. [§602.26(e)]

-- The agency must provide documentation to demonstrate that it has a consistent standard for determining when to provide notification to the Department of any institution it has reason to believe is failing to meet its Title IV, HEA program responsibilities or is engaged in fraud or abuse. [§602.27(a)(6-7),(b)]

-- The agency must provide documentation that it has a policy that meets all the requirements of this section when making a decision to grant initial or renewed accreditation. [§602.28(b)]

-- The agency must provide documentation to demonstrate that it has a policy to address the requirements of this section. [§602.28(c)]

-- The agency must demonstrate that it has a policy meet the requirements of this section. [§602.28(d)]

-- The agency must demonstrate that it has an information sharing policy that meets the requirements of this section. [§602.28(e)]

General Information:

The Accrediting Council for Independent Colleges and Schools (ACICS) is a national institutional accreditor that was founded in 1912. The agency currently accredits approximately 192 institutions with 268 campuses across the United States and in Puerto Rico. The agency's recognition would enable its institutions to establish eligibility to receive Federal student assistance funding under Title IV of the Higher Education Act of 1965, as amended. Consequently, the agency must meet the Secretary's separate and independent requirements as part of the recognition review process.

Recognition History:

The Secretary of Education first recognized ACICS in 1956 under the agency's former name, the Accrediting Commission for Business Schools. Since that time, the Secretary periodically reviewed the agency and granted it continued recognition until the Secretary denied recognition effective December 12, 2016.

The last full review of ACICS took place at the June 2016 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI), where both Department staff and NACIQI recommended denial of recognition.

In conjunction with the current review, Department staff reviewed the agency's narrative and supporting documentation. Department staff also observed the agency's Intermediate Review Committee (IRC) meeting and two appeals panels in November 2017, and its

Requested Scope of Recognition
Narrative
<p>The accreditation of private postsecondary institutions offering certificates or diplomas, and postsecondary institutions offering associate, bachelor's, or master's degrees in programs designed to educate students for professional, technical, or occupational careers, including those that offer those programs via distance education.</p>
<p>Analyst Remarks to Narrative: As an initial applicant, the agency does not have a current scope of recognition.</p> <p>The agency is seeking recognition of the accreditation of private postsecondary institutions that offer programs up to the master's degree level in professional and vocational fields both residentially and via distance education.</p> <p>The agency did not state the requested geographic area of its accrediting activities.</p> <p>The agency is not requesting the recognition of preaccreditation nor for programs offered via correspondence education.</p> <p>On page 14 of the agency's Accreditation Criteria (Exhibit 1), it states "This function has been deemed appropriate by the U.S. Department of Education." In Section 2-2-111, the agency states "The initial Council approval allows the institution to apply for submission of an application for approval of that competency-based program to the United States Department of Education for Title IV Federal student financial aid." As the agency is not currently recognized by the Department and as there is no discrete approval process by the Department reserved for competency-based programs, these statements are misleading and needs to be removed.</p>

Criteria: 602.10 Link to Federal programs

Narrative

ACICS is an institutional accrediting organization that accredits institutions of higher learning offering credentials at the diploma, certificate, associate's, bachelor's, and master's degree levels (Exhibit 1, Accreditation Criteria, Title I, Chapter 1, p. 12 and Appendix A, ACICS Bylaws, p. 97). Currently, ACICS accredits approximately 239 institutions (as defined by the Department as a main location and its additional locations) that comprise approximately 560 campuses (including main and branch campuses as defined in the Accreditation Criteria), both in the United States and internationally. (Exhibit 2, ACICS Directory of Accredited Institutions). The mission of ACICS is to advance educational excellence at independent, nonpublic career schools, colleges, and organizations in the United States and abroad. (Exhibit 1, Accreditation Criteria, Appendix A, ACICS Bylaws, p. 97). This mission is achieved through a constantly evolving and strengthening, deliberate and thorough accrediting process of quality assurance and enhancement as well as adherence to ethical business and educational practices.

Institutions accredited by ACICS, or in the process of achieving accreditation, must meet the minimum institutional eligibility requirements as stated in the ACICS Accreditation Criteria. (Exhibit 1, Title I, Chapter 2, pp. 14-15). The minimum eligibility requirements for accreditation by ACICS as stated in the Accreditation Criteria include: (1) that an institution is presumed to be an institution of higher education if it enrolls a majority of its students in one or more programs, the content of which is on a postsecondary academic level and that leads to a postsecondary academic credential; (2) enrolls students who possess a high school diploma or equivalent or who are beyond the age of compulsory school attendance and demonstrate through valid assessment an ability to benefit from the educational experience; and (3) offers at least one program which is a minimum of 300 clock hours in length. See id. In addition, the institution must be legally organized and licensed by the appropriate state agency. See id. The ACICS eligibility standards are consistent with the definition of "institution of higher education" in the HEA for purposes of participation in Title IV, HEA programs. (Exhibit 3, 34 C.F.R §600.4, §600.5, and §600.6).

Accreditation by ACICS, when ACICS becomes a recognized agency, will satisfy a required element of Title IV, HEA program institutional eligibility for ACICS accredited institutions. Specifically, an eligible institution under the HEA is one that is accredited by a nationally recognized accrediting agency "that the Secretary recognizes as a reliable authority to determine the quality of education or training offered by an institution or a program offered by an institution." (Exhibit 4, 34 C.F.R §600.2).

Attached are letters granting initial accreditation to two institutions, and letters from those institutions indicating that they will apply to participate in at least one HEA program. (Exhibit 5, Initial Approval Letters, AIHT & BAUI).

ACICS understands clearly that recognition of an agency by the Secretary - and the satisfaction of an HEA institutional eligibility requirement that such recognition brings to ACICS institutions - acts to delegate to ACICS a critical "gatekeeping" function in conducting vigilant review of applications for accreditation as well as accredited institutions to validate initial and continued compliance with the Accreditation Criteria. For that reason, prior to applying for ACICS accreditation and through the initial application process, institutions are reviewed, evaluated, and visited to determine their compliance with the ACICS minimum eligibility requirements. (Exhibit 6, Policies and Procedures Manual, Chapter 28). As part of this review, ACICS conducts an Initial Resource Evaluation visit to determine if the institution meets the minimum eligibility requirements and to determine if the institution is ready for and capable of moving forward with the accreditation process. (Exhibit 7, Initial Rejection Letter-Knoxville College).

ACICS standards include a continuous review process that seeks to validate that all institutions are meeting its requirements for minimum eligibility or to take action when deficiencies are noted. If a concern arises through an evaluation visit or external information that an institution may no longer be eligible, ACICS will provide written documentation of the concern, request a written institutional response, and then take appropriate action. (Exhibit 8, Sample Initial Approval-Larkin, Exhibit 9, Denial of Renewal Application – Ineligibility Spanish American Institute, and Exhibit 10, Denial of Renewal Application – Ineligibility SOLEX). The policies and procedures ACICS uses to determine initial eligibility for accreditation and monitoring for maintaining eligibility for continued accreditation are discussed in detail in Sections §602.17, §602.19, and §602.23(c) of this petition.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 10 Denial of Renewal Application - Ineligibility SOLEX	Exhibit 10 Denial of Renewal Application-Ineligibility SOLEX.pdf		
Exhibit 2 ACICS Directory of Accredited Institutions	Exhibit 2 ACICS Directory of Institution.pdf		
Exhibit 3- 34 C.F.R 600.4 , 600.5, 600.6	Exhibit 3 34 CFR 600.4 600.5 600.6.pdf		
Exhibit 4- 34 C.F.R 600.2	Exhibit 4 CFR 600-2.pdf		
Exhibit 5 Initial Grant Approval and Intent to Apply for HEA Letters	Exhibit 5 Initial Grant Approval and Intent to Apply for HEA Letters.pdf		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		
Exhibit 7 Initial Rejection Letter-Knoxville College	Exhibit 7 Initial Rejection Letter-Knoxville College.pdf		
Exhibit 8 Sample Initial Approval - Larkin	Exhibit 8 Sample Initial Approval - Larkin.pdf		
Exhibit 9 Denial of Renewal Application - Ineligibility Spanish American Institute	Exhibit 9 Denial of Renewal Application-Ineligibility Spanish American Institute.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

The agency currently accredits 560 campuses, as defined by the agency (or 239 institutions as defined by the Department). The agency provided two letters of interest from accredited institutions regarding intent to apply for participation in Title IV, Higher Education Act (HEA) student financial aid programs (Exhibit 5).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.11 Geographic scope of accrediting activities.			
Narrative			
<p>The accreditation activities of ACICS are national and international in scope. The ACICS Articles of Incorporation and IRS 501(c)(3) Designation, see Exhibit 12, describe how ACICS is organized to accredit institutions offering career education. The mission of ACICS is to accredit institutions on a national and international scope and it is described in its Accreditation Criteria as a "national accrediting agency" (Exhibit 1, Title I, Chapter 1, Section 1-1-200, p. 12). Institutions throughout the United States and its territories are eligible to apply for accreditation. (Exhibit 1, Title I, Chapter 2, Introduction, p. 14). The ACICS Online Directory of Accredited Institutions identifies all institutions accredited by ACICS and it includes institutions in 44 states, the District of Columbia, Puerto Rico, and 11 other countries (Exhibit 2, ACICS Directory of Accredited Institutions).</p>			
Document(s) for this Section			
Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 12 Articles of Incorporation and IRS Designation	Exhibit 12 Articles of Incorporation and IRS Designation.pdf		
Exhibit 2 ACICS Directory of Accredited Institutions	Exhibit 2 ACICS Directory of Institution.pdf		
Analyst Worksheet - Narrative			
Analyst Review Status: Does not meet the requirement of this section.			
Staff Determination The agency must provide an updated directory of accredited institutions.			
Analyst Remarks to Narrative: ACICS is a national accrediting agency and currently accredits 239 institutions with 560 campuses in 44 states, the District of Columbia and Puerto Rico, as noted in Section 602.10. The agency's Articles of Incorporation indicate that the geographic scope of ACICS is the United States, and the scope is demonstrated by the list of accredited institutions (Exhibit 12). However, the accredited institutions directory provided is not current at the publication of the draft staff analysis; therefore the agency needs to provide the current directory.			
List of Documents Uploaded by Analyst - Narrative			
No Files uploaded			

Criteria: 602.12(a) Accrediting Experience Initial

Narrative

ACICS has been in existence since 1912 and was granted initial recognition by the U.S. Department of Education's predecessor agency in 1956 (Exhibit 13, 1956 Recognition Letter). ACICS has over 100 years of experience as an accrediting agency for career focused institutions of higher education with 60 of those under the recognition of the U.S. Department of Education or its predecessor agency. ACICS had been recognized by the Department to accredit institutions of higher education throughout the United States and internationally offering credentials at the diploma, certificate, associate's, bachelor's, and master' degree level up until the Department's December 12, 2016, decision to withdraw ACICS as a recognized agency. Since December 12, 2016, to date, however, ACICS has continued to operate as an accrediting agency overseeing currently accredited institutions and processing existing applications for accreditation from new institutions.

Currently, ACICS continues its activities to oversee 139 accredited institutions across 44 states, the District of Columbia, Puerto Rico and 11 international countries that offer credentials at the diploma, certificate, associate's, bachelor's, and master's degree levels. (Exhibit 2, ACICS Online Directory of Accredited Institutions). As a result, ACICS continues its activities as an accrediting agency uninterrupted since its start in 1912. ACICS is filing an initial petition for recognition to allow its currently accredited institutions across 44 states, the District of Columbia, Puerto Rico and 11 international countries that offer credentials at the diploma, certificate, associate's, bachelor's, and master's degree levels to meet the requirements of institutional eligibility under the HEA as addressed further by the ACICS response to Section §602.10 of this petition.

ACICS's requested scope of recognition is unchanged from that recognized by the Department previously: "The accreditation of private postsecondary institutions offering certificates or diplomas, and postsecondary institutions offering associates, bachelor's or master's degrees in programs designed to educate students for professional, technical, or occupational careers, including those that offer those programs via distance education." (Exhibit 14, 2013 Scope of Recognition Letter). The ACICS Accreditation Criteria includes sections that specifically relate to the level of credential as well as general standards for all institutions (Exhibit 1, Title III, Evaluation Standards, Chapters 1-7, pp. 45-82). Institutions will need to meet the applicable standards in order to be deemed in compliance with the Accreditation Criteria. See id.

Since October 1, 2015, ACICS has granted accreditation to 22 institutions that exemplify the geographic scope, credentials, programs and institution types accredited by ACICS that are consistent with its stated mission (Exhibit 15, Council Actions Summary).

As stated above, ACICS has been in existence as an accrediting agency since 1912, with 60 of those under recognition by the Department until the December 2016 decision to deny ACICS continued recognition. However, even since the loss of recognition, ACICS has continued to conduct accrediting activities uninterrupted. This includes making accreditation decisions for member institutions in accordance with its policies and procedures and granting initial and renewal accreditation to institutions which offer Distance Education (Exhibit 16, Sample Council Action Letters). ACICS has also continued all other activities required in order to remain a fully-functioning agency as if it was a recognized accrediting agency. For example, ACICS has conducted routine comprehensive on-site evaluations in conjunction with renewal of accreditation applications. (Exhibit 17, Institutional File, ACCT, pp. 203-526; Exhibit 18, Institutional File, Branford Hall-Branford, pp. 21-203). ACICS has continued to review complaint and external adverse information and conduct follow-up investigations through such investigatory tactics, such as unannounced and limited-announced visits. (Exhibit 19, Complaints Investigation, Hondros College). ACICS has continued to review campus-level and program-level student achievement outcomes and take actions that include adverse actions against campuses and programs (Exhibit 20, Sample Student Achievement Withdrawal Letters). Further, ACICS Review Board panels who have considered appeal requests from accredited members who have had their accreditation applications denied (Exhibit 21, Institutional File, WVBC, pp. 519-520; Exhibit 22, Institutional File, CENSA, pp. 144-145).

ACICS has also continually reviewed and revised its accrediting standards over the last 18 months. Specifically, ACICS has conducted a close review of its policies and procedures, particularly those that were cited by the Department as a basis for its December 2016 decision. The ACICS revisions to policies and procedures made over this time period will be evident throughout the petition and are evidenced in the Systematic Review of Criteria, Exhibit 23. To highlight a few of those changes, ACICS has fully implemented its Placement Verification Program, which was developed to evidence validity to those employments reported by accredited institutions and included in their placement percentages. Each month, accredited institutions submit placements made during the prior month for electronic verification (via e-mail) or by ACICS staff members. Only those placements determined to be valid can be included in the final annual employment outcomes (Exhibit 6, Policies and Procedures Manual, Chapter 39, Placement Verification Program; Exhibit 24, PVP Driven Sub Change Deferral/Denial Letters). In addition, ACICS implemented an At-Risk Institutional Group, which reviews all institutions who have complaints, external adverse information, financial concerns, poor student achievement outcomes, and other factors in order to determine the investigatory tactic to take place, such as unannounced visits, secret shopper reviews, and communication (Exhibit 6, Policies & Procedures Manual, Chapter 13, Complaint and External Information Review-ARIG Procedures, pp. 37-38; Exhibit 25, SIBA Secret Shopper Review).

In sum, since at least October 1, 2015, ACICS has been acting as an institutional accrediting agency by granting accreditation to numerous institutions that cover the range of credentials, programs, institutions and geographic area under its requested scope. ACICS has also been actively conducting accrediting agency activities including significant review and evaluation of its policies and procedures, implementing new oversight policies and procedures related to student outcomes, and establishing and taking action from new protocols to address compliance risk at ACICS accredited institutions.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 13 1956 Recognition Letter	Exhibit 13 1956 Recognition Letter.pdf		
Exhibit 14 2013 Scope of Recognition Letter	Exhibit 14 2013 Scope of Recognition Letter.pdf		
Exhibit 15 Council Actions Summary	Exhibit 15 Council Actions Summary.pdf		
Exhibit 16 Sample Council Action Letters	Exhibit 16 Sample Council Action Letters.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 19 Complaints Investigation Honrdros College	Exhibit 19 Complaints Investigation Hondros College.pdf		
Exhibit 2 ACICS Directory of Accredited Institutions	Exhibit 2 ACICS Directory of Institution.pdf		

Exhibit 20 Sample Student Achievement Withdrawal Letters	Exhibit 20 Sample Student Achievement Withdrawal Letters.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 22 Institutional File-CENSA	Exhibit 22 Institutional File CENSA.pdf		
Exhibit 23 Systematic Review of Criteria	Exhibit 23 Systematic Review of Criteria.pdf		
Exhibit 24 PVP Driven Sub Change Deferral/Denial Letters	Exhibit 24 PVP Driven Sub Change Deferral_Denial Letters.pdf		
Exhibit 25 SIBA Secret Shopper Review	Exhibit 25 SIBA Secret Shopper Review.pdf		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

ACICS currently accredits 239 institutions with 560 campuses (per Section 602.10), the first of which was accredited by the agency in 1912, which demonstrates that ACICS has conducted accrediting activities for at least two years prior to seeking recognition, as required by this section. The accredited institutions are across the United States and their programs cover the range of the specific credentials at the diploma, certificate, associate's, bachelor's, and master's degree levels.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.13 Acceptance of the agency by others.

Narrative

Please see Exhibit 219 Appendix A and exhibits A - AM for additional documentation.

ACICS continues to accredit 239 institutions with 560 campuses throughout the United States and abroad (Exhibit 2, ACICS Directory of Accredited Institutions). Attached are letters of support from educators at ACICS accredited institutions, (Exhibit 26, Letters of Support-Educators at Member Institutions) and from accredited institutions stating that they acknowledge ACICS policies, procedures and accreditation decisions (Exhibit 27, Letters of Support-Accredited Institutions).

The acceptance of ACICS as an accreditor by members of the education community is further demonstrated by the transferability of course credits earned at ACICS accredited schools to other accredited institutions. More than half of ACICS institutions have established articulation agreements with institutions accredited by regional and national accrediting agencies, and many have an agreement with a regionally accredited institution. Attached are letters of support from institutions of higher education that accept transfer of credit from ACICS accredited institutions, (Exhibit 28, Letter of Support-Transfer Credit) and sample articulation agreements with other institutions (Exhibit 29, Articulation Agreements). Educators affiliated with non-ACICS accredited institutions also evidence acceptance of ACICS standards, policies, procedures, and decisions (Exhibit 30, Letters of Support-Non-Member Educators). Further, ACICS has been invited over the past two years to participate and speak on higher education topics from its perspective as an accrediting agency (Exhibit 31, Invitations from CAPPs/ACCET).

Exhibits 32-34 include a list of ACICS site team and other evaluators, Council members and Review Board members and background on the educational expertise of each of those individuals (Exhibit 32a, Evaluator Roster; Exhibit 32b, Evaluator Resumes; Exhibit 33, Council Roster w/Resumes; Exhibit 34, Review Board Roster with Resumes). This information demonstrates the backgrounds from fields relevant to the scope of the accreditation ACICS grants as well as geographic and institutional diversity (ACICS member and non-member educators). The Criteria supports the involvement of educators/academics in the review and revision of ACICS standards and/or agency policies and procedures (Exhibit 1, Sections 2-1-401, p. 19; 2-1-402, p. 19; 2-1-602, p. 20; 3-1-512(a), p. 54).

ACICS has successfully completed formal recognition reviews by the Accrediting Commission for Education in Nursing (ACEN), the Council for Higher Education Accreditation (CHEA) (Exhibit 36, CHEA Recognition) and the American Registry of Radiologic Technologists (ARRT) during the past eight years. ACICS is also recognized by the American Association of Colleges of Nursing. Of the five recognition sources, only CHEA requires periodic renewal of recognition. Therefore, ACICS has not been required to, nor has it sought renewal reviews by the other four entities, and therefore does not have affirmative documentation of its continuing acceptance by those authorities to submit to ED Staff. However, ACICS's status with each of those entities has not changed. For example, the Accreditation Commission for Education in Nursing (ACEN) and the Joint Review Commission on Education in Radiologic Technology of AART (J-CERT) recognize ACICS as an accrediting agency (Exhibit 37, Screenshots of Programmatic Accreditation Continued Recognition). There has been no lapse in ACICS acceptance by ACEN or J-CERT. In addition, the Commission on Accreditation of Allied Health Education Programs (CAAHEP) continues to recognize ACICS as the accrediting agency for institutions that offer CAAHEP-accredited educational programs, and ACICS is listed as an accrediting agency on the Accrediting Council for Occupational Therapy Education (ACOTE) form (Exhibit 38, Evidence of Programmatic Accreditation Additional Recognition).

ACICS is recognized by state and foreign education agencies as a reliable authority on the quality and integrity of accredited institutions. The current status of ACICS accredited institutions' recognition as meeting a requirement of THEC licensing has not changed in light of ACICS's current status (Exhibit 39, Screenshot of THEC recognition of sample ACICS accredited institutions). In all instances, when ACICS evaluates the eligibility of any college or school for accreditation by the agency, the institution must demonstrate that it has been granted authority to operate as an educational institution by the government agency with jurisdiction, be it a state authorizing entity in the United States. As a result, ACICS routinely works with these education agencies to assure compliance by its accredited institutions with their requirements. For example, ACICS has actively sought to build positive relationships with state education agencies, including for example by inviting state participation on ACICS site visits and sharing information with state education agencies (Exhibit 40, Sample Communication Evidencing Cooperation). In addition, ACICS is proactive in reaching out to the states whenever ACICS has an institution under review, is considering an action or where a school closure is possible. See id. ACICS is also recognized internationally as a reliable authority on quality and integrity by more than 13 foreign ministries of education (Exhibit 41, International Ministries of Higher ED, Notification of Accreditation).

The acceptance of ACICS by employers is demonstrated by the placement performance for graduates as reported by ACICS accredited institutions on the annual Campus Accountability Report. The mean percentage of students placed for all ACICS institutions was 71% in 2016 and 75% in 2015. These students were placed in positions in Nursing, Business, IT, Medical Assisting and other fields. Due to concerns expressed in the 2016 Department Staff Report, Exhibit 42, and as discussed in more detail under Section § 602.16 of this petition, ACICS has completely overhauled its process for collecting student achievement data, including data on licensure attainment by graduates so that ACICS decision-makers and stakeholders can rely on information made publicly available about the performance of ACICS institutions. ACICS has made significant improvements in verifying institutionally reported placement data that is submitted as evidence of employer acceptance of graduates from ACICS accredited institutions. Further, ACICS includes employer satisfaction as part of the Campus Effectiveness Plan as a measure of its effectiveness (Exhibit 1, Appendix K, pp. 132-133). Employers participate on ACICS site visit teams, serve on advisory committees/boards and contribute to the process of ACICS (Exhibit 43, Letters of Support-Employers).

Higher education associations also acknowledge and accept ACICS as an accreditor (Exhibit 35, Letters of Support-Higher Ed Associations).

Relevant ACICS History is found in Exhibit 44.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 2 ACICS Directory of Accredited Institutions	Exhibit 2 ACICS Directory of Institution.pdf		
Exhibit 219: Appendix A	Appendix A - 602.13 - Wide Acceptance by Others.docx		
Exhibit 26 Letters of Support-Educators at Member Institutions	Exhibit 26 Letters of Support - Educators at Member Institutions.pdf		
Exhibit 27 Letters of Support-Accredited Institutions	Exhibit 27 Letter of Support - Accredited Institutions.pdf		
Exhibit 28 Letters of Support- Transfer Credit	Exhibit 28 Letters of Support - Transfer Credit.pdf		

Exhibit 29 Articulation Agreements	Exhibit 29 Articulation Agreements.pdf		
Exhibit 30 Letters of Support-Non Member Educators	Exhibit 30 Letters of Support - Non-Member Educators.pdf		
Exhibit 31 Invitations from CAPPs and ACCET	Exhibit 31 Invitations from CAPPs and ACCET.pdf		
Exhibit 32a- Evaluator Roster	Exhibit 32a Evaluator Roster.pdf		
Exhibit 32b- Evaluator Resumes	Exhibit 32b Evaluator Resumes.pdf		
Exhibit 33 Council Roster with Resumes	Exhibit 33 Council Roster with Resumes.pdf		
Exhibit 34 Review Board Roster with Resumes	Exhibit 34 Review Board Roster with Resumes.pdf		
Exhibit 35 Letters of Support-Higher Ed. Associations	Exhibit 35 Letters of Support-Higher Ed Associations.pdf		
Exhibit 36 CHEA Recognition	Exhibit 36 CHEA Recognition.pdf		
Exhibit 37 Screenshots of Programmatic Accreditation Continued Recognition	Exhibit 37 Screenshots of Programmatic Accreditation Continued Recognition.pdf		
Exhibit 38 Evidence of Programmatic Accreditation Additional Recognition	Exhibit 38 Evidence of Programmatic Accreditation Additional Recognition.pdf		
Exhibit 39 Screenshot of THEC recognition of sample ACICS accredited institutions	Exhibit 39 Screenshot of THEC recognition of sample ACICS accredited institutions.pdf		
Exhibit 40 Sample Communication Evidencing Cooperation	Exhibit 40 Sample Communication Evidencing Cooperation.pdf		
Exhibit 41 International Ministries of Higher ED, Notification of Accreditation	Exhibit 41 International Ministries of Higher ED, Notification of Accreditation.pdf		
Exhibit 42 2016 Department Staff Report	Exhibit 42 2016 Department Staff Report.PDF		
Exhibit 43 Letters of Support-Employers	Exhibit 43 Letters of Support-Employers.pdf		
Exhibit 44 Relevant ACICS History-602.13(a)(b)	Exhibit 44 Relevant ACICS History 602.13ab.pdf		
Exhibit A	Exhibit A - Educators on ACICS Council.pdf		
Exhibit AA - Chart of ACICS Practitioner Volunteers	Exhibit AA - Chart of ACICS Practitioner Volunteers.pdf		
Exhibit AB - Practitioner Involvement and Qualifications	Exhibit AB - Practitioner Involvement and Qualifications.pdf		
Exhibit AC - Collins Letter of Support	Exhibit AC - Collins Letter of Support.pdf		
Exhibit AD - Sullivan Letter of Support	Exhibit AD - Sullivan Letter of Support.pdf		
Exhibit AE - Practitioner Support Letters	Exhibit AE - Practitioner Support Letters.pdf		
Exhibit AF - Practitioner Trade Assoc. Support	Exhibit AF - Practitioner Trade Assoc. Support.pdf		
Exhibit AG - Employer Support on Advisory Board	Exhibit AG - Employer Support on Advisory Board.pdf		
Exhibit AH - Employer Participation in Systematic Review	Exhibit AH - Employer Participation in Systematic Review.pdf		
Exhibit AI - Employer Comments from PVP	Exhibit AI - Employer Comments from PVP.pdf		
Exhibit AJ - acics-verification-status-2017-12-08 14-04-11	Exhibit AJ - acics-verification-status-2017-12-08_14-04-11.xlsx		
Exhibit AK - Employer Documentation and Letters	Exhibit AK - Employer Documentation and Letters.pdf		
Exhibit AL - ACEN Screenshot	Exhibit AL - ACEN Screenshot.pdf		
Exhibit AM - Map	Exhibit AM - Map.pdf		
Exhibit B - Educators on Review Board Panel	Exhibit B - Educators on Review Board Panel.pdf		
Exhibit C - Faculty Participation in Systematic Review	Exhibit C - Faculty Participation in Systematic Review.pdf		
Exhibit D - Public Educators on Site Visits	Exhibit D - Public Educators on Site Visits.pdf		
Exhibit D1 - Public Educators serving as ACICS Evaluators	Exhibit D1 - Public Educators serving as ACICS Evaluators.pdf		
Exhibit E - Member Educators on Site Visits	Exhibit E - Member Educators on Site Visits.pdf		
Exhibit E1 -Member Educators serving as ACICS evaluators	Exhibit E1 -Member Educators serving as ACICS evaluators.pdf		
Exhibit F -Directory of Insitutions	Exhibit F -Directory of Insitutions.pdf		
Exhibit F1 - ACICS Accredited Institutions.xls	Exhibit F1 - ACICS_Accredited_Institutions.xls.xlsx		
Exhibit G - Letters of Support Member Educators	Exhibit G - Letters of Support Member Educators.pdf		
Exhibit H - Letters of Support Public Educators	Exhibit H - Letters of Support Public Educators.pdf		
Exhibit I - Matching letters of support with accrediting agencies	Exhibit I - Matching letters of support with accrediting agencies.pdf		
Exhibit J - Letters of Support - Institutions	Exhibit J - Letters of Support - Institutions.pdf		
Exhibit K - Interest in Becoming Accredited	Exhibit K - Interest in Becoming Accredited.pdf		

Exhibit L - Higher Education Letters of Support	Exhibit L - Higher Education Letters of Support.pdf		
Exhibit M - Sample Articulation Agreements	Exhibit M - Sample Articulation Agreements.pdf		
Exhibit N - Articulation Agreements Chart	Exhibit N - Articulation Agreements Chart.pdf		
Exhibit O - CHEA Letter	Exhibit O - CHEA Letter.pdf		
Exhibit P - Licensing Body Approvals Master List	Exhibit P - Licensing Body Approvals Master List.XLSX		
Exhibit Q - ACOTE Letter of Support	Exhibit Q - ACOTE Letter of Support.pdf		
Exhibit R - CAPTE Letter of Support	Exhibit R - CAPTE Letter of Support.pdf		
Exhibit S - ABHES Letter of Support	Exhibit S - ABHES Letter of Support.pdf		
Exhibit T - ACEN Letter of Support	Exhibit T - ACEN Letter of Support.pdf		
Exhibit U - ARRT Information	Exhibit U - ARRT Information.pdf		
Exhibit V - PA Cosmo Board	Exhibit V - PA Cosmo Board.pdf		
Exhibit W - CA Court Reporting Board	Exhibit W - CA Court Reporting Board.pdf		
Exhibit W1 - Letter of Support Ohio	Exhibit W1 - Letter of Support Ohio.pdf		
Exhibit X - IL Board of Higher Education - Email	Exhibit X - IL Board of Higher Education - Email.pdf		
Exhibit Y - Call for Comment and State Participation	Exhibit Y - Call for Comment and State Participation.pdf		
Exhibit Z - Call for Comment Survey Response	Exhibit Z - Call for Comment Survey Response.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide additional information and documentation to demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by educators, licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions within the agency's jurisdiction prepare their students.

Analyst Remarks to Narrative:

On December 1, 2017, the Department sent a letter to ACICS advising the agency (in accordance with Section 602.32(e)) that it had not demonstrated compliance with this section of the basic eligibility requirements (AG Exhibit #1 - December 1 Letter). ACICS provided additional information and documentation related to this section on December 29, 2017, which is the subject of this analysis.

As of December 29, 2017, the agency states its membership includes 192 institutions with 268 campuses throughout the U.S. and abroad (Exhibit A).

Educators:

In the December 1 Letter, the Department noted that the support from educators - both within its membership and from the greater higher education community - was extremely limited. Specifically, the agency provided two letters of support from educators at member institutions and two letters of support from educators at institutions outside its membership, but who are also ACICS volunteers. The agency also provided a list of site visitors, council members, and appeals panel pool members, but the documentation was lacking detail to demonstrate broad support by educators both within its membership and from the greater higher education community.

In response, the agency provided documents identifying educators on its council, appeals panel pool, on-site teams, and within the agency's 'call for comment' process to review proposed changes to the agency's standards. Specifically, the agency provided the evaluator list for 17 site visits, to include resumes, and a list of over 150 educators in the site visitor pool. The site visit participants and pool included educators from both ACICS and non-ACICS accredited institutions (Exhibits D, D1, E, & E2). The site visits only include five since July 2016 and do not demonstrate the current participation of educators. Six faculty members participated in the 'call for comment' process and it is not clear if those faculty were from ACICS and/or non-ACICS accredited institutions (Exhibit C).

The agency also provided letters of support from educators at its accredited institutions in Exhibit G. Of the 61 distinct letters (as four duplicates were provided), 29 were provided from educators in one school group - Education Corporation of America (ECA) - and those letters were not letters of support for ACICS, but rather letters of support for the individual institution. In addition to those letters, 27 of the remaining letters were from educators at seven institutions. And, 17 of the letters were not signed. The agency also provided letters of support from educators at institutions not accredited by ACICS in Exhibit H. Of those four letters, two were previously submitted in Exhibit 30 and as the Department noted in its December 1 Letter, those letters are from current council members. The other two are from individuals who serve as site visitors for ACICS.

Educational institutions:

In the December 1 Letter, the Department noted that some of the documentation submitted as support for ACICS by its accredited institutions was misleading as well as not substantive. Additional documentation provided in the form of transfer of credit examples and executed articulation agreements also did not demonstrate wide acceptance by educational institutions as the examples were of limited number and related primarily to one school group accredited by ACICS.

In response, the agency provided letters of support from educational institutions and higher education associations, whose membership includes institutions accredited by ACICS and by other accrediting agencies. Specifically, the agency provided letters and emails from over 20 of its accredited institutions and almost 20 of those formerly accredited by it, as well as five institutions that have expressed interest in obtaining accreditation from ACICS (Exhibits J & K). The agency also provided additional articulation agreement examples from a wider population of its accredited institutions (Exhibit M). The letters of support from four higher education associations in Exhibit L are the same ones previously submitted in Exhibit 35.

Licensing bodies:

In the December 1 Letter, the Department noted that the agency did not provide information or documentation that appeared applicable or sufficient to demonstrate wide acceptance by licensing bodies in its initial submission. The agency provided screenshots from other organizations that listed ACICS as a "recognized accrediting agency," but provided no information or other documentation that those listings demonstrate wide acceptance by licensing bodies, nor that the support is current. The Department also noted that some of the documentation

submitted as support for ACICS by a State licensing body was inaccurate, and that other documentation constituted information-sharing notices, not expressed support of ACICS' standards, policies, procedures, and decisions to grant or deny accreditation.

In response, the agency provided information and documentation that recognition by the Council for Higher Education Accreditation (CHEA) is accepted by some programmatic accrediting agencies in order for the programs accredited by those agencies to be reviewed and accredited, which is required for graduates to sit for State licensing examination and/or to obtain licensure and/or employment in the field. The agency also provided a letter from CHEA stating that ACICS is currently recognized (Exhibit O). Exhibits 36 and O document that ACICS has not been reviewed for recognition by CHEA since 2013.

ACICS also provided letters from the Accrediting Council for Occupational Therapy Education (ACOTE), Commission on Accreditation in Physical Therapy Education (CAPTE), Accrediting Bureau of Health Education Schools (ABHES), and Accreditation Commission for Education in Nursing (ACEN) that recognition of ACICS by CHEA is accepted for institutions sponsoring programs accredited by the programmatic accrediting agency (Exhibits Q, R, S, & T). These letters do not specifically state support for the standards, policies, procedures, and decisions to grant or deny accreditation of ACICS, but rather the recognition by CHEA of ACICS. The agency also provided a letter from the American Registry of Radiologic Technologists (ARRT) that ACICS is recognized as an institutional accrediting agency; however, based on the addressee and date of the February 2, 2015 letter, it does not demonstrate current support (Exhibit U).

The agency also stated that certain states require specific programs to be accredited by a programmatic accrediting agency for graduates to sit for State licensing examination and/or to obtain licensure and/or employment in the field in those states. In addition, the agency provided information that recognition by CHEA is accepted by some State education agencies and/or State licensing boards for institutional and/or programmatic licensure purposes. ACICS also provided letters from the Commonwealth of Pennsylvania State Board of Cosmetology, Court Reporters Board of California, Ohio State Board of Career Colleges and Schools, and an email from the Illinois Board of Higher Education that recognition of ACICS by CHEA is accepted for institutional licensure and/or program approval purposes by those entities (Exhibits V, W, W1, & X). Based on the addressee and date of the August 5, 2016 letter, the letter from the Court Reporters Board of California does not demonstrate current support. The agency also provided documentation of participation of nine State representatives within the agency's 'call for comment' process to review proposed changes to the agency's standards (Exhibit Y), as well as specific comments from the state of Florida (Exhibit Z).

Practitioners:

The Department noted in its December 1 Letter that the agency did not provide any information or documentation concerning wide acceptance by practitioners in the professional or vocational fields for which the educational institutions within the agency's jurisdiction prepare their students in its initial submission.

In response, the agency provided the evaluator list for over 20 site visits, to include the resumes of practitioners, and a sample list of over 55 practitioners in the site visitor pool (Exhibits AA & AB). The site visits include 10 since July 2016 and do not clearly demonstrate the current participation of practitioners. The agency also provided nine letters of support from practitioners in varied fields in Exhibits AC, AD, and AE, of which three of the letters were not signed. In addition, the agency provided letters of support from two professional associations, the California Court Reporters Association and the Deposition Reporters Association of California (Exhibit AF). Based on the addressee and date of the July 22, 2016 letter, the letter from the Deposition Reporters Association of California does not demonstrate current support.

Employers:

In the December 1 Letter, the Department noted that ACICS used placement rates to demonstrate support from employers. However, the data used to generate the rates were from self-reported and unverified data, which was the subject of significant concern from the Department, and therefore those rates could not be used to demonstrate support by employers. The only additional documentation provided by the agency were five letters of support from employers all from institutions owned by one school group.

In response, the agency provided documentation of participation of employers on program advisory committee meetings at its institutions, site visits, and within the agency's 'call for comment' process to review proposed changes to the agency's standards (Exhibits AG & AH). The agency provided only one example of an employer participating on a site visit, and the participation in the 'call for comment' process consisted of only four employers (Exhibit AH).

The agency also provided documentation of employer participation in the agency's Placement Verification Program (PVP), which includes comments on the graduates employed (Exhibit AI). The PVP is discussed in more detail in Section 602.19(b).

The agency also submitted Exhibit AK to establish employer support. However, Exhibit AK consisted of mostly of employment verification forms or letters and program advisory committee member lists. To the extent it included some letters of support, almost all of those letters were not letters of support for ACICS, but rather letters of support for the individual institution. In addition, the employer letters of support of individual institutions relate to only nine ACICS accredited institutions.

As noted above, the agency states that it accredits 192 institutions with 268 campuses throughout the U.S. and abroad in Exhibit A (page 5). In the same exhibit (page 13), the agency includes an extensive list of the diverse professional or vocational fields represented by the institutions accredited by ACICS. And, in this petition, the agency is requesting a scope of recognition to include private postsecondary institutions that offer programs up to the master's degree level in professional and vocational fields both residentially and via distance education. The information and documentation provided in this section does not demonstrate that the agency has the breadth and depth of support from educators, licensing bodies, practitioners, and employers throughout the U.S. as would be expected of an agency of such size and scope. Therefore, the agency must provide additional information and documentation to demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by educators, licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions within the agency's jurisdiction prepare their students. Also see concerns raised by two third-party comments, Written Comment #9 - Center for American Progress and Written Comment #14 - TCF, concerning the wide acceptance of ACICS by the entities required by this section.

Throughout the narrative response, the agency presented its observation of the review of other accrediting agencies related to this criterion, and asserted that ACICS had met the requirements of this section based on its comparison of information and documentation noted in the final staff reports for those agencies. As noted in a recent appeal decision (Docket No. 14-10-O), recognition is an individualized and discretionary process, as each review is conducted in the context of the specific accrediting agency. Therefore, Department staff does not base its recommendation on the recognition review process for accrediting agencies of differing sizes, policies and missions.

List of Documents Uploaded by Analyst - Narrative

Exhibit _1 - Failure to meet basic eligibility requirements-ACICS 12-1-17.pdf

Criteria: 602.14(a) Category of Agency			
Narrative			
<p>ACICS is an accrediting agency that (1) has a voluntary membership of institutions of higher education; (2) has as its principal purpose the accrediting of institutions of higher education, with that accreditation being a required element in enabling a majority of those institutions to participate in HEA programs; and (3) has an organizational structure that satisfies the Secretary's current definition of "separate and independent."</p> <p>ACICS has a voluntary membership of institutions of higher education. The ACICS Articles of Incorporation state that "...[t]he members of the corporation shall consist of institutions of higher education which provide career education and training and which have been accredited by the Council..." (Exhibit 12, Articles of Incorporation, p. 2). The Council's membership is defined in Article I, Section 8, of the ACICS Bylaws, which state: "Membership shall be institutional or organizational in nature and shall consist of accredited colleges, postsecondary schools, branches, and other entities, all as defined in the Accreditation Criteria of ACICS" (Exhibit 1, p. 97). Further, Article VI, Section 1, of the Bylaws states: "Membership in ACICS is voluntary and can only be obtained through accreditation" (Exhibit 1, p. 103). Finally, an accredited institution may voluntarily withdraw its accreditation from ACICS at any time, as stated in Article VI, Section 2, of the Bylaws: "...members may voluntarily resign" (Exhibit 1, p. 103).</p> <p>ACICS has as its principal purpose the accrediting of institutions of higher education, with that accreditation being a required element in enabling a majority of those institutions to participate in HEA programs: "The Council fulfills an evaluative and accrediting function for a particular sector of postsecondary education" (Exhibit 1, Accreditation Criteria, Introduction of Title I, Chapter 2, p. 14). Further, the mission of ACICS is as follows:</p> <p>The mission of the Accrediting Council for Independent Colleges and Schools is to advance educational excellence at independent, nonpublic career schools, colleges, and organizations in the United States and abroad. This is achieved through a deliberate and thorough accrediting process of quality assurance and enhancement as well as ethical business and educational practices" (Exhibit 1, Title I, Chapter 1, p. 12).</p> <p>A majority of ACICS institutions rely on the agency's recognition from the Secretary to establish their eligibility to participate in HEA programs. See additional discussion in ACICS Response to §602.10. However, ACICS institutions may use other accreditation to establish their HEA eligibility, and several ACICS institutions, primarily located outside the United States, choose not to participate in HEA programs.</p> <p>ACICS meets the Secretary's definition of "separate and independent." ACICS is governed by an independent Board of Directors consisting of nine (9) to fifteen (15) members, at least thirty (30) percent of whom are elected and the balance of whom are appointed by the Council (Exhibit 1, Appendix A, Bylaws, Article III, Section 1, p. 99). At least forty (40) percent of the appointed members are public members as defined in the ACICS Bylaws (Exhibit 1, Appendix A, Bylaws, Article I, Section 7, p. 97). The members of the Board of Directors also serve as the 9 to 15 commissioners on the ACICS Council (Exhibit 1, Appendix A, Bylaws, Article II, Section 1, page 97).</p> <p>The Council is responsible for all accreditation actions and systematic criteria review. ACICS is a fully independent agency receiving no financial support or direction from any outside or parent organization. Accreditation decisions are made only by ACICS commissioners or, in the case of appeals, by an independent Review Board. Minutes of two Council meetings are included to evidence the independence of the Council's actions (Exhibit 45, Council Meeting Minutes-December 2016 and April 2017).</p> <p>Additionally, ACICS is authorized by the Commonwealth of Virginia to operate as a non-stock corporation and has been granted 501(c)(3) non-profit status by the Internal Revenue Service (Exhibit 12, Articles of Incorporation & 501(c)(3) designation).</p> <p>Please note that §602.14 (a)(2), (a)(3), and (a)(4) do not apply to ACICS.</p>			
Document(s) for this Section			
Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 12 Articles of Incorporation and IRS Designation	Exhibit 12 Articles of Incorporation and IRS Designation.pdf		
Exhibit 45 Council Meeting Minutes-December 2016 and April 2017	Exhibit 45 Council Meeting Minutes-December 2016 and April 2017.pdf		
Analyst Worksheet - Narrative			
Analyst Review Status: Does not meet the requirement of this section.			
Staff Determination The agency must demonstrate it meets the "separate and independent" requirements.			
Analyst Remarks to Narrative: The agency is requesting recognition under Section 602.14(a)(1). The agency has, as a principal purpose, the accrediting of institutions of higher education and that accreditation is a required element in enabling those institutions to participate in title IV, HEA programs. The agency's bylaws state that it is a voluntary membership organization with the purpose to accredit postsecondary institutions (Exhibit 1, Appendix A). Additional details are provided in Section 602.14(b) about why the agency does not meet the separate and independent requirements.			
List of Documents Uploaded by Analyst - Narrative			
No Files uploaded			

Criteria: 602.14(b) Separate and Independent

Narrative

The Accreditation Criteria includes a complete description of the composition, power, and duties of the commissioners which meet the definition of separate and independent as evidenced below (Exhibit 1, Appendix A, Bylaws, Article II, Sections 1 and 2, pp. 97-98).

The Articles of Incorporation state the following:

"No part of the net earnings of the corporation shall inure to the benefit of, or be distributed to, its members, directors, officers, or other private persons, except that the corporation shall be authorized to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth in Article Sixth hereof. No substantial part of the activities of the corporation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the corporation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of or in opposition to any candidate for public office...." (Exhibit 12, p. 3).

Council members are not elected or selected by the board or chief executive officer of any related, associated, or affiliated trade association or membership organization. The nine (9) to fifteen (15) commissioners who sit on the Council are the accreditation policy and decision-making body for ACICS. The commissioners are elected by the membership or appointed by Council members, and are not elected or selected by the board or chief executive officer of any related, associated, or affiliated trade association or membership organization. The selection process is administered by the Nominating Committee, which screens nominees and selects candidates for election as commissioners. The Nominating Committee is comprised of five (5) members, at least four (4) of whom are current commissioners. Two (2) are representatives from the Executive Committee of the Board of Directors, including the Council vice chair, who chairs the nominating committee; and one (1) person is from an ACICS-accredited institution, who may or may not be a member of the Council. (Exhibit 1, Appendix A, Bylaws, Article V, Section 1, pp. 101-102). The committee calls for nominations from the membership and presents the slate of candidates to the membership.

For the purposes of reviewing and making decisions on institutions who have appealed adverse actions, ACICS constitutes a Review Board of Appeals. The Review Board serves as a decision-making body, since a panel of review board members has the authority to affirm the action of the Council, remands the case to the Council for further review, amend, or reverses the action. The Review Board consists of a pool of fifteen (15) persons, which include at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members (Exhibit 1, Appendix A, Article III, Section I, p. 99; Article VII, pp. 104-105; Exhibit 34, Review Board Roster).

ACICS meets the Department's requirements for a public member. At least one member of the agency's decision-making body is a representative of the public, and at least one-seventh of that body consists of representatives of the public. The Accreditation Criteria require that at least forty (40) percent of the appointed commissioners shall be representatives of the public. (Exhibit 1, Appendix A, Article III, Section 1, p. 99). Currently, the Council includes seven (7) public members (Exhibit 33, Council Roster). Public representatives are discussed in more detail in Criteria §602.15(a)(5) of this petition.

Public members are defined as "persons who are interested in career education; have knowledge or experience useful to the accreditation process; are willing to contribute opinion, advice, and expertise to the endeavors of ACICS and the Council; and are not (1) employed by an institution or program that either is accredited by the agency or has applied for accreditation; or (2) associated as members of the governing board, owners, shareholders, consultants or in some other similar capacity with an institution or program that either is accredited by the agency or has applied for accreditation; or (3) a member of any trade association or membership organization related to, affiliated with, or associated with the agency; or (4) a spouse, parent, child, or sibling of an individual identified in paragraph (1), (2) or (3) of this definition" (Exhibit 1, Appendix A, Article I, Section 7, p. 97). When an opening arises for a public member, the Council requests the staff to provide recommendations from the pool of evaluators who meet the criteria for a public representative. Evaluators are used because they are familiar with ACICS, its mission, and the Accreditation Criteria. The staff provides recommendations of several candidates to the Nominating Committee. The Nominating Committee then follows its procedures for contacting the candidates to find out their interest in being considered to serve, reviewing current résumés and other pertinent information, and makes a recommendation to the Council.

ACICS has established and implemented guidelines for each member of the decision-making body to avoid conflicts of interest in making decisions. The ACICS Policies and Procedures Manual (Exhibit 6, Chapter 2) and the Commissioner and Board of Directors Training Manual (Exhibit 46, p. 9) address conflict of interest policies and guidelines. Commissioners must sign and ACICS keeps on file Conflict of Interest forms (Exhibit 47). Members of the Review Board of Appeals also sign a Conflict of Interest form (Exhibit 48). Commissioners may not participate in deliberations or decisions regarding an institution with which they have any affiliation. They declare their abstention on a signature sheet that contains a list of all institutions to be considered for Council action (Exhibit 49, Sample Council Abstention List). More detailed information about avoiding conflict of interest in the decision-making process is found in §602.15(a)(b).

ACICS dues are paid separately from any dues paid to any related, associated, or affiliated trade association or membership organization. All ACICS fees come directly from institutions to ACICS. These include annual accreditation sustaining fees, program application fees, and training workshop fees. ACICS does not receive funds from any other organization. ACICS derives some revenue from its investment account, which constitutes the agency's reserve funds. Exhibit 50 is a sample of payment of invoices for an institution (a main campus and its branch campuses) by the corporate office directly to ACICS.

ACICS develops and determines its own annual capital and operations budgets with no review by or consultation from outside entities or agencies. The budgets are approved by the Board/Council prior to the start of the fiscal year. A sample annual operating budget is shown in Exhibit 51, FY2018 Operating Budget. The authority for the Board/Council to independently approve the annual budget is cited in the Accreditation Criteria (Exhibit 1, Appendix A, Bylaws, Article II, Section 2, p. 97). ACICS financial statements are audited annually by an independent auditing firm.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 12 Articles of Incorporation and IRS Designation	Exhibit 12 Articles of Incorporation and IRS Designation.pdf		
Exhibit 33 Council Roster with Resumes	Exhibit 33 Council Roster with Resumes.pdf		
Exhibit 34 Review Board Roster with Resumes	Exhibit 34 Review Board Roster with Resumes.pdf		
Exhibit 46 Commissioner and Board of Director Training Manual	Exhibit 46 Commissioner and Board of Director Training Manual.pdf		
Exhibit 47 Council Conflict of Interest Forms	Exhibit 47 Council Conflict of Interest Forms.pdf		

Exhibit 48 Review Board Conflict of Interest Forms	Exhibit 48 Review Board Conflict of Interest Forms.pdf		
Exhibit 49 Sample Council Abstention List	Exhibit 49 Sample Council Abstention List.pdf		
Exhibit 50 Invoice Payment Samples	Exhibit 50 Invoice Payment Samples.pdf		
Exhibit 51 FY2018 Operating Budget	Exhibit 51 FY2018 Operating Budget.pdf		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide information and documentation that it requires that at least one-seventh of an appeals panel consists of representatives of the public. The agency must also provide documentation of the implementation of the council member nomination, election and selection process, outlined in the agency's bylaws. It must also provide documentation of the appointment process of the appeals panel members by the council.

Analyst Remarks to Narrative:

(1) The ACICS Council is the decision- and policy-making body of the agency. The council member nomination, election and selection process is outlined in the agency's bylaws, which is included in Appendix A of the agency's Accreditation Criteria (Exhibit 1). Council members are elected by the agency's membership from a slate prepared by a nominating committee for accredited members, or appointed by the council's members. Although the agency described the process, it did not provide any documentation to confirm the process, to include the members of the nominating committee or documentation of elections and appointments.

Department staff also notes that the agency's bylaws state that the Vice Chair "shall serve as Chair of the Board and Council in the subsequent year" in Article II, Section 3(b). And, in Article III, Section 3, the bylaws state "The Chair of the Council shall be the Vice Chair from the previous year." The same individual, Roger Swartzwelder, has served as Vice Chair of the Council for at least two years, but has not served as Chair. The bylaws also state the officers of the Board of Directors shall include a Secretary in Article II, Section 3(c), but it is not clear that anyone serves or has recently served in that role. The agency did not provide any information or documentation for its apparent failure to abide by its bylaws in these areas. Department staff requests the council rosters, to include board officer notations and dates served, since the beginning of 2016, in addition to any other information or documentation provided in response.

The agency's bylaws related to appeals states that the agency maintains a pool of 15 appeals panel members, who are appointed by the council. No other organization or association is involved based on the agency's bylaws, however the agency did not provide any documentation to confirm the appointment process.

(2) The agency's bylaws require at least 40% of the nine to 15-member council to be public representatives thus meeting the 1:7 ratio required by the criterion.

Although not mentioned in the narrative, the agency's bylaws related to appeals states that at least one public representative is required on an appeals panel, which is composed of at least three individuals. However, the bylaws do not appear to provide for the requirement of additional public representatives should an appeal panel be comprised of more than eight individuals.

The agency's definition of a public representative meets the definition included within the Secretary's Criteria for Recognition.

(3) The agency addresses conflicts of interest for its council members and appeals panel pool within its "Standards of Ethical Responsibility." The standards provide examples of common conflicts of interest and require council or appeals panel members to recuse themselves in the case of conflict. The agency provided documentation to reflect that the agency uses recusals by council members to guard against conflicts of interest (Exhibit 47).

The agency provided documentation of signed attestations for the council and appeals panel to demonstrate that members of those bodies are informed of and acknowledge the conflicts of interest standards (Exhibits 47 & 48). The agency also provided the training manuals for each of the bodies (Exhibit 46 & in Section 602.15(a)(6)), which include additional information on how they are informed of the agency's expectations with regards to conflict of interest.

(4) The agency's bylaws state that the council is responsible for assessing and collecting fees from member institutions, and provided documentation to demonstrate that it receives due directly from its member institutions.

(5) The agency's bylaws state that the council (acting in the capacity of the board of directors) is responsible for developing and approving an annual budget, and provided the agency's FY 2018 budget (Exhibit 51).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.15(a)(1) Staffing/Financial Resources

Narrative

The ACICS Board of Directors has primary responsibility for ensuring that the agency has adequate resources, including staffing, and is led by professionals with appropriate experience and knowledge to support the Council's development and application of accreditation standards. In July 2016, the Board appointed Roger J. Williams to serve as interim President. Prior to retiring, Mr. Williams served as the Executive Director of the Accrediting Council for Continuing Education and Training (ACCET), a U.S. Department of Education recognized national accrediting agency. During his tenure at ACCET, Mr. Williams led the agency through several successful petitions for renewal of recognition by the Department and chaired the Council of Recognized National Accrediting Agencies (CRNAA). He was also appointed by the Department of Education to serve as lead negotiator on several rulemaking panels. Mr. Williams is considered to be an expert on accreditation, accrediting agency management, and outcomes assessment strategies. Mr. Williams left retirement to serve as the interim President of ACICS to allow for an experienced and respected leader to take the agency through challenging times (Exhibit 52, Leadership Team, pp.7-8).

ACICS recently hired a permanent President to provide leadership and oversight of the agency. Ms. Michelle Edwards has served on the Board/Council since 2015 and as Chair since the beginning of this year, during which her collaborative management style and skills were both apparent and beneficial to the Council's deliberations. She has been engaged in proprietary education for the past nine years at Delta School of Business and Technology, located in Lake Charles, Louisiana, serving in the official capacity as Dean of Academics, while multitasking across the broader spectrum of regulatory compliance issues necessitated by the day to day demands of a small school environment. During that period, she served on over 50 on-site team visits, offering the clearest demonstration of a mission-focused work ethic committed to accreditation in service to the mission of ACICS. (Exhibit 52, Leadership Team, pp. 1-6).

The Vice President of Accreditation has been with the agency for more than 10 years, progressing through the ranks to gain significant experience in all areas of accreditation and compliance. She holds a Master of Business Administration from the Robert Smith School of Business at the University of Maryland College Park and Bachelor's degrees in International Business and Spanish from SUNY Plattsburgh. The Vice President of Operations has been with the agency since 2013. He holds several industry certifications (ITIL, MCSE, PMP, and Six Sigma, among others) and Bachelor's degree in Management from the University of Phoenix (Exhibit 52, Leadership Team, pp.9-18). All staff who are responsible for the development and application of ACICS standards are required to successfully complete formal training, observe evaluation site visits, and pass multiple performance reviews, both formally and informally. Further, all other staff members have been assigned to roles that are aligned with their academic and experiential backgrounds (Exhibit 53, Staff Listing with Resumes).

ACICS accredits 239 institutions in the United States and abroad which contribute to the annual operating budget through sustaining fees, program and activity fees (Exhibit 2, ACICS Directory of Institutions). This revenue is supplemented through income from ACICS's investment portfolio (Exhibits 54, FY2017 Operating Budget; and Exhibit 51, FY2018 Operating Budget). ACICS continues to have significant reserves to assure continuity of its operation. See id. at Article V, Section 2(c), p. 99. The budget process starts with staff putting together a budget for the President to review. Once accepted by the President, it is presented to the Board to review and approve. See id. at Article II, Section 2(b), p. 97.

Every month, the ACICS Executive Committee, as established in the ACICS Bylaws of the Accreditation Criteria, Exhibit 1, at Article V Section 2(a), p. 99, has a standing meeting to review the previous month's Statement of Activity, Balance Sheet, Investment Portfolio, and Banking Statements. Additionally, the Investment Committee, as authorized in the ACICS Bylaws, meets with a representative from ACICS' Investment Firm during the Quarterly Board Meetings. See id. at Article V, Section 2(c), p. 99. The budget process starts with staff putting together a budget for the President to review. Once accepted by the President, it is presented to the Board to review and approve. See id. at Article II, Section 2(b), p. 97.

ACICS manages financial risk in several ways. The Council retains outside legal counsel to provide advice on due process considerations and to defend ACICS in school action matters, including show cause directives, terminations and denials of accreditation. ACICS' President sees that volunteers and staff are trained appropriately for their roles, policies and procedures are applied consistently and conflicts of interest and confidentiality policies are enforced. See Section §602.15(a)(6). A forum selection clause in ACICS Bylaws requires cases to be adjudicated in a convenient forum: Federal District Court in the Eastern District of Virginia. See id [Bylaws], at Article IX, Section 1, p. 106. ACICS Bylaws also enable the agency to recover the costs of litigation from the institutions involved. See id at Article IX, Section 2. ACICS maintains insurance coverage to fund the indemnification provisions of its Bylaws and cover the financial risks associated with defending itself through the legal process. The VP of Operations has worked with a financial consultant to review ACICS's current coverage and to make sure ACICS has the adequate Liability and D&O policies. Requests were made to several independent insurance providers before selecting an appropriate policy (Exhibit 56, ACICS Certificate of Liability Insurance).

Relevant ACICS History is found in Exhibit 57.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 51 FY2018 Operating Budget	Exhibit 51 FY2018 Operating Budget.pdf		
Exhibit 52 Leadership Team	Exhibit 52 Leadership Team.pdf		
Exhibit 53 Staff Listing with Resumes	Exhibit 53 Staff Listing with Resumes.pdf		
Exhibit 54 FY2017 Operating Budget	Exhibit 54 FY2017 Operating Budget.pdf		
Exhibit 55 2016 Financial Audit	Exhibit 55 2016 Financial Audit.pdf		
Exhibit 56 ACICS Certificate of Liability Insurance	Exhibit 56 Certificate of Liability Insurance.pdf		
Exhibit 57 Relevant ACICS History 602.15(a)(1)	Exhibit 57 Relevant ACICS History 602.15a1.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide documentation to demonstrate that the staffing is sufficient to carry out all accrediting functions and responsibilities. The agency must also provide documentation to demonstrate that the leadership team is sufficiently familiar with the Secretary's Criteria for Recognition to meet its requirements. It must provide an update of the 2018 budget and submit the 2017 audited financial statements for the agency.

Analyst Remarks to Narrative:

The agency maintains 17 staff members, including a president, to assist with the performance of accreditation activities, according to staff directory (Exhibit 53). Although the agency provided the qualifications and experience of staff members via resumes and professional background summaries, the agency did not provide any job descriptions or other documentation to reflect that all accrediting functions are included, clearly identified, and effectively organized. Therefore, the Department could not determine that current staffing levels are sufficient to perform accreditation activities for the agency's 239 institutions with 560 campuses, especially as the agency employed 41 staff members when it accredited 245 institutions with 674 campuses in 2016. The Department is concerned about the deficiencies noted throughout this draft staff analysis, and that the reduction in staff could be part of the reason for such deficiencies.

In addition, the agency provided significant information and documentation for Roger Williams, who served as interim president of the agency from July 2016 to July 2017. Although the information and documentation reflect the accreditation experience of Mr. Williams, this information and documentation is not relevant to the current administrative and fiscal capability of the agency, since it appears that he is no longer affiliated with the agency. The current president, Michelle Edwards, holds an MBA and has served most recently as dean of academics for a vocational school. Based on her resume (Exhibit 52), her duties primarily involved the administration and evaluation of the educational programs and faculty, but included maintaining compliance with State, accreditation, and Federal regulations. For ACICS, she served as a site visitor since 2010, on the council since 2015 and as council chair from January 2017 until her appointment as president in July 2017. The agency also provided the resumes of the rest of the leadership team (Exhibit 52), which consists of two vice presidents who have been with ACICS for 5 and 10 years, respectively. Although the agency provided some information and documentation concerning the education and experience of the leadership team, it is not clear that the team is familiar with the Secretary's Criteria for Recognition in light of the deficiencies noted throughout this draft staff analysis.

The agency's budget is sustained primarily through annual fees collected from its accredited institutions (Exhibits 51 & 54). Although there has been a significant reduction in sustaining fees collected, the assets reported on the 2016 audited financial statements appear to be sufficient to insure the agency's ability to continue its accreditation activities (Exhibit 55). However, the agency must submit the 2017 audited financial statements, as well as an update to the 2018 budget.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.15(a)(2) Competency of Representatives

Narrative

As detailed in Exhibit 84, ACICS has made several significant changes to strengthen its governance over the past year.

The Council is chiefly responsible for policy development and accreditation decisions. All commissioners be persons interested in career education; have knowledge or experience useful to the accreditation process; and are willing to contribute opinion advice and expertise. New commissioners complete training that orients them to Council standards, practices and procedures, and includes participation in the file review process at the Intermediate Review Committee (IRC) (Exhibit 46). The objectives of the training, which takes place prior to their first meeting, include an overview of accreditation, ACICS' role in the accreditation triad, agency mission and values, and the responsibilities of Council members. See id. The training also guides new commissioners regarding the development of standards by which institutions are measured. See id. All commissioners, receive an orientation at least once a year, on relevant procedural and technical requirements of the processes related to their reviews (Exhibit 65).

The Review Board of Appeal, a decision-making body, has the authority to affirm, modify or reverse an accrediting decision of the Council. The Board consists of 15 members, each serving a three-year term. Board members are selected based on their accreditation experience and background (Exhibit 34). Review Board members "shall not have been a commissioner within one year prior to appointment" (Exhibit 1, Article VII, Section 1, p. 104). They also receive training that is specifically tailored to their roles prior to the assumption of a review (Exhibit 66 and Exhibit 67).

The Executive Committee, having the authority to make accreditation decisions on behalf of the Council, is also considered a decision-making body. The Executive Committee's responsibilities are "...between meetings of the Board and /or Council, act on issues requiring timely attention of the Board or Council and assume such other duties as the Board of Directors or Council may from time to time delegate to the Executive Committee" (Exhibit 1, at Article V, Section 2, pp. 102-103). The Committee meets monthly to review and take action on substantive change applications and consider other accreditation matters. Because the Committee "...consist[s] of the Chair of the Board of Directors...the Vice Chair of the Board...; the Treasurer; and two additional Directors elected annually..." training is congruent with what is provided to the Council and Board of Directors. See id.

A team of evaluators is assigned to conduct an onsite review of the sufficiency of an institution's compliance with ACICS standards as part of an evaluation process. Evaluators are selected from educators, executives and practitioners. To serve as an evaluator on an ACICS onsite review team, an individual must register and be vetted through a formal process as outlined in Chapter 52 of the Policies and Procedures Manual (Exhibit 6). The online registration (see Exhibit 68, Becoming an Evaluator Web Page, Step 4; and Exhibit 69, Visit Evaluation Procedures and Guidelines, p.2) requires evaluators to specify their role as academic or administrative and demonstrate that they are qualified by submitting evidence of academic preparation and licensure in the relevant field. They are also expected to have five years of documented experience and/or education in a specialty area or expertise. The information submitted is used to ensure that every reviewer is appropriately qualified to serve in their assigned capacity. This review is completed by the evaluator management coordinator who evaluates the academic preparation and professional experiences of the applicant against the program descriptions of the Classification of Instructional Programs (CIP) as well as the requirements to serve as student relations and educational activities specialists (Exhibit 68). For those programs that require licensure, registration, or certification, submission of current licensure/registration/certification is required as part of the vetting process and recorded in the system (Exhibit 70). Qualifications and program review alignments with experience/academic preparation are all managed in the ACICS database which has been configured to search and provide evaluator matches that meet specific parameters for each review. Resumes of visit team members demonstrate the agency's interpretation and adherence to its definitions (Exhibit 18, pp. 123, 189-219 and Exhibit 17, pp. 288-313).

New evaluators must complete training that includes review of the Accreditation Criteria, report preparation process, and the onsite information gathering procedures (Exhibit 71). After the initial training, ACICS conducts additional sessions to ensure that all site visitors are current on ACICS-accreditation issues and equipped to serve in their role (Exhibit 72 and Exhibit 73). Evaluators who are assigned to onsite visits are briefed on new procedural and policy changes that affect their review (Exhibit 74).

Every ACICS evaluation team is led by a chair selected and trained to assure that the visit is conducted consistently and thoroughly. ACICS applies the qualification requirements for team chairs through a thorough application and selection process (Exhibit 75) with formal and ongoing training provided (Exhibit 76 and Exhibit 77). New chairs are also mentored by experienced chairs and feedback from mentors and ACICS staff is provided to further inform the chair's performance (Exhibit 78 and Exhibit 79). To further ensure that the team's leadership, and the ACICS staff member, is fully aware of the enhanced expectations of the role, additional training is conducted (Exhibit 80).

ACICS is requesting distance education (DE) in its scope of recognition. Evaluators serving in this role must demonstrate experience in management, instruction, and curricular development of DE programs, as well as having completed training in that mode of delivery (Exhibit 81). During its review of qualifications process, distance education experts who did not have the requisite evidence or who were no longer active in that mode of delivery, were removed from that pool of review (Exhibit 86, pp.5-11). Further, the expectations of the evaluation components specific to distance education are outlined in the Visit Evaluation Procedures and Guidelines (Exhibit 69, pp.24-25). Evidence of such evaluation by the DE expert can be found in Exhibit 17, pp. 276-282 and 444-445.

ACICS relies on experienced evaluators, chairs, and former commissioners as an additional resource for the evaluation of team reports and school responses, in an advisory capacity. Those individuals, as a group, make recommendations that are considered by the Council when making accreditation decisions (Exhibit 1, Section 2-1-602, p.20). The IRC Application includes the identification of the individual's experience serving as a site reviewer as well as experience in the preparation and review of institutional responses (Exhibit 83). Selections are made by staff and selected individuals are placed in an active pool for assignments in the future.

Relevant ACICS History is found in Exhibit 82.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 34 Review Board Roster with Resumes	Exhibit 34 Review Board Roster with Resumes.pdf		

Exhibit 46 Commissioner and Board of Director Training Manual	Exhibit 46 Commissioner and Board of Director Training Manual.pdf		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		
Exhibit 65 Commissioner Orientation	Exhibit 65 Commissioner Orientation.pdf		
Exhibit 66 Review Board Training Manual	Exhibit 66 Review Board Training Manual.pdf		
Exhibit 67 CSI Review Board	Exhibit 67 CSI Review Board.pdf		
Exhibit 68 Becoming an Evaluator Webpage	Exhibit 68 Becoming an Evaluator Web Page.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		
Exhibit 70 Sample Evaluators-Licensure	Exhibit 70 Sample Evaluators- Licensure.pdf		
Exhibit 71 Evaluator Training Binder	Exhibit 71 Evaluator Training Binder.pdf		
Exhibit 72 Evaluator Refresher Training	Exhibit 72 Evaluator Refresher Training.pdf		
Exhibit 73 Evaluator Training-Ed. Activities	Exhibit 73 Evaluator Training-Ed. Activities.pdf		
Exhibit 74 Sample Pre-Visit Meeting Outlines	Exhibit 74 Sample Pre-Visit Meeting Outlines.pdf		
Exhibit 75 Team Chair Application	Exhibit 75 Team Chair Application.pdf		
Exhibit 76 Chair Training Binder	Exhibit 76 Chair Training Binder.pdf		
Exhibit 77 Team Chair Professional Development Binder	Exhibit 77 Team Chair Professional Development Binder.pdf		
Exhibit 78 New Chair Training Evaluation Form	Exhibit 78 New Chair Training Evaluation Form.pdf		
Exhibit 79 Chair Evaluation Survey Samples	Exhibit 79 Chair Evaluation Survey_Samples.pdf		
Exhibit 80 Team Chair Training Attendees	Exhibit 80 Team Chair Training_Attendees.pdf		
Exhibit 81 Sample DE Evaluators w/Resumes	Exhibit 81 Sample DE Evaluators wResumes.pdf		
Exhibit 82 Relevant ACICS History-602.15(a)(2)	Exhibit 82 Relevant ACICS History 602.15(a)(2).pdf		
Exhibit 83 IRC Application	Exhibit 83 IRC Application.pdf		
Exhibit 84 ACICS Governance Changes 602.15(a)(2)	Exhibit 84 ACICS Governance Changes 602.15(a)(2).pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide documentation to demonstrate that the council composition meets the requirements of the agency's bylaws. The agency must also provide information and documentation concerning the executive committee, to include its function and composition. It must provide the current roster of council members and appeals panel pool members to demonstrate compliance with this section. The agency must provide information and documentation on the qualifications of council members to review and evaluated programs offered via distance education. The agency must also provide documentation of all training provided to council members, as well as any training provided with regards to the review of programs offered via distance education. It must provide documentation of any training provided to evaluators with regards to the review of programs offered via distance education. The agency must provide documentation of the evaluation, selection and training of IRC members.

Analyst Remarks to Narrative:

Council members: The council is both the policy- and primary decision-making body of the agency, per the agency's bylaws included as Appendix A of the agency's Accreditation Criteria (Exhibit 1). The agency's bylaws state that the council includes at least nine but no more than 15 members, at least 30% of whom are elected by the membership with the remainder appointed by the council. Of the appointed members, at least 40% of those (not to exceed seven) must be public representatives. The council will also include at least two academic representatives and at least two administrative representatives.

The agency provided the 11-member roster of the council (Exhibit 33), however it does not reflect the composition required by the bylaws. Specifically, there is only one council member as elected by the membership, when to meet the bylaws requirements of at least 30% would require four members to be elected by the membership. The roster provided is not current at the publication of the draft staff analysis, as it includes members whose terms expired in 2017; therefore the agency needs to provide the current roster of the council.

The agency also states that the executive committee of the council serves as a decision-making body for agency for actions in between council meetings, to include the review and approval of substantive changes. Although the agency stated that the executive committee includes the chair, vice chair, treasurer, and two other council members, the agency did not provide a roster of the executive committee membership for review. In addition, the executive committee is not included within the agency's requested scope of recognition as a decision-making body, nor has the agency demonstrated that the executive committee meets the representation requirements of Sections 602.14(b), 602.15(a)(3) and 602.15(a)(5).

Although the agency indicated the experience of council members (Exhibit 33), the agency did not provide any information or documentation to demonstrate that the council includes expertise in the review and evaluation of distance education, nor that they have been specifically trained on their responsibilities regarding programs offered via distance education.

The agency provided information and documentation that the council members receive training by the agency on their role and responsibilities regarding the agency's standards, policies, and procedures. The documentation included the council training manual and annual orientation session (Exhibit 65). Department staff notes that the council training manual (Exhibit 46) includes many instances of information that does not reflect the agency's policies and procedures as stated in this petition, as follows:

"An institution that objects to a Council decision to deny an application for a new grant, branch campus inclusion, or reinstatement of accreditation following a change of ownership has a right and will be given the opportunity to present its case to a panel of Commissioners at a subsequent, regularly scheduled meeting of the Council." (page 39)

"A show-cause is not considered a negative action." (page 40)

"An institution may have its accreditation suspended following a show-cause directive when, in the judgment of the Council, the institution no longer complies with the criteria." (page 45)

"Three of the review board members must be public members and three must be academic representatives." (page 46)

"A financial statement is required of all institutions 180 days following the end of their fiscal year. This statement is not required to be audited and certified." (page 52)

"All suspensions except summary suspensions must be preceded by show-cause directives and are appealable to the Review Board." (page 54)

The agency also stated that training included attendance at an Intermediate Review Committee (IRC) session, but did not provide documentation of such training. Therefore, it is not clear that the council members receive appropriate training and guidance on their roles based on the information and documentation provided.

Appeals panel members: The agency maintains a 15-person appeal panel pool (review board of appeals), which includes at least two academic representatives, two administrative representatives, and three public representatives, per the agency's bylaws. The agency provided the current roster of the appeals panel pool (Exhibit 34), which appears to reflect the composition required by the agency's bylaws. However, the roster provided is not current at the publication of the draft staff analysis, as it includes members whose terms expired in 2017; therefore the agency needs to provide the current roster of the appeals panel pool.

When convened, an appeals panel is a decision-making body and is comprised of at least three members. The appeal panel pool is selected by the council, as discussed in Section 602.14(b). The agency also provided the resumes of the appeal panel pool to demonstrate the qualifications of those included in the pool (Exhibit 34). Training is primarily provided via the appeals panel training manual (Exhibit 66) and during an on-site orientation when convened (Exhibit 67).

Evaluators: The agency provided the roster of evaluators in Section 602.13 (Exhibit 32a). Although the agency stated that its pool of 1,600 evaluators and team chairs are qualified by education and experience, the agency did not provide documentation of the process to evaluate qualifications of potential evaluators against its required qualifications. The agency detailed the process for selection, but did not provide any completed applications for either evaluators or team chairs to demonstrate implementation. The agency provided examples of site visit teams and resumes of the participants to demonstrate the qualifications of evaluators (Exhibits D and E).

The agency provided samples of curricula vitae for evaluators with expertise in distance education for the review of such programs (Exhibit 81); however the agency did not provide any information or documentation concerning the training provided by the agency on their role and responsibilities regarding the agency's standards, policies, and procedures with regards to distance education - except for a one-page outline of distance education specialist activities in the evaluator procedures manual (Exhibit 64, page 24).

The agency provided information and documentation concerning the training provided to evaluators regarding their role and responsibilities, as well as the standards, policies, and procedures of the agency. This training is accomplished through attendance at an evaluator training webinar, an evaluator procedures manual, a pre-visit meeting orientation, and team chair mentoring and training (Exhibits 71-77). The agency provided documentation of participation by evaluators in the training sessions, as well as materials used in the training sessions (Exhibit 72).

Intermediate Review Committee (IRC): The agency states that it utilizes the IRC to make an initial review of an institution's documentation, the site visit team report, and the institution's response to that report, and make a recommendation to the council. The agency provided information and documentation concerning the selection of IRC members; however the documentation appears to be outdated (Exhibit 83) and no completed documentation of the application/selection process was provided. In addition, the agency did not provide a current roster of IRC members to determine the qualifications of the members, nor any information or documentation concerning the training of the members for their role.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.15(a)(3) Academic/Administrator Representatives

Narrative

A team of evaluators is appointed to review the sufficiency of an institution's compliance with ACICS standards on site as part of an initial grant, renewal grant or substantive change evaluation. ACICS requires that every full onsite evaluation team has at least one academic and one administrative evaluator (Exhibit 1, Section 2-1-402, p.19).

As part of the registration process to become an evaluator, ACICS requires the applicants to specify their role as academic or administrative, which is then verified through the vetting process (Exhibit 68, Becoming an Evaluator Web Page; Exhibit 69, Visit Evaluation Procedures and Guidelines, p.3). This information is reviewed by the evaluator management coordinator to ensure that evaluators in the pool are properly classified as administrators or academics. The ACICS IT platform facilitates the composition of full teams to include at least one academic and one administrative representative (Exhibit 85, Screenshots of Evaluator Databases and Team Compositions). A sample of team member resumes, maintained on file at ACICS, and cover pages from team reports, demonstrate that ACICS complies with this policy (Exhibit 17, Institutional Files-ACCT, pp. 288-313; Exhibit 18, Institutional File – Branford Hall, pp. 123, 189-219).

In 2016, ACICS culled its list of evaluators so that the files of current evaluators contain updated information relative to their qualifications. ACICS has reviewed all resumes of active evaluators, including their professional experience, and the relevance and currency of documented experience to the evaluation roles they are assigned. Based on a standard of five years or less as a measurement of recent involvement, and a review of 917 active evaluators, 326 are classified as academic and 447 as administrative representatives. The remaining 139 are classified as "neither" as they are not currently engaged in post-secondary administrative or academic activities (Exhibit 32a, Evaluator Roster). To further assure that evaluators are serving in appropriate roles based on their qualifications, ACICS has required evaluators with resumes older than 5 years to resubmit the documentation of their education and experience along with evidence to support their area of expertise (Exhibit 86, Email Communication to Evaluators). Following extensive review, outreach, and updates, ACICS has purged its evaluator pool of individuals who did not provide current, accurate substantiating evidence of their experience. These individuals are no longer on ACICS's active list of evaluators.

ACICS' requirement for academic and administrative members of the Council, which is the agency's primary decision- and policy-making body, are included in the Bylaws (Exhibit 1, Appendix A, Article I, p. 97). Council composition requirements further specify that it "...shall include at least two academic representatives and two administrative representatives". (Ibid., Article III, Section 1, p. 99). "Academic" is someone currently or recently directly engaged in a significant manner in postsecondary teaching or research. "Administrative" is someone currently or recently directly engaged in a significant manner in postsecondary institutional or programmatic administration. See Id.

Currently, four (4) members of the Council fulfil the academic category, and five (5) members the administrative (Exhibit 33, Council Roster w/ Resumes. As previously noted, the Executive Committee is also considered a decision-making body and its current composition meets the academic and administrative requirements. See Id.

The Review Board, sitting as a review panel, has the authority to affirm, modify or reverse an accrediting decision of the Council, and therefore, is a decision-making body. The Board consists of at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members (Exhibit 1, Section 2-3-602, p. 41; Article VII, Section 1, p.104. The 15-person Board, serving three-year terms, includes academic and administrative representatives (Exhibit 34, Review Board Roster w/resumes). Each Review Board panel must include at least one public, one academic and one administrative representative and as evidenced in all recent reviews, this requirement was met (Exhibit 21, Institutional File-WVBC, pp. 519-539; Exhibit 22, Institutional File-CENSA, pp. 141-154).

In its role as an advisory board, making a recommendation to the Council, the Intermediate Review Committee is an evaluation body which also meets the academic and administrative requirements. Assignments on the IRC during a specific accreditation review are based on the number of actions being considered, the types of review, and the expertise needed (Exhibit 87, IRC Rosters w/Designations and Resumes).

Relevant ACICS History--

In the 2016 Staff Report to the Senior Department Official (SDO) ("Staff Report") that formed the basis of the Secretary's December 2016 decision to deny continued recognition of ACICS, the Department Staff stated that ACICS needed to clarify and document its entire process for the recruitment, selection, and verification of the qualifications and experience possessed by those select under this criteria. See Exhibit 42, pp. 1, 9. The Staff Report contains positive statements about ACICS compliance with these criteria, but in response to concerns cited by the Department, ACICS has taken the steps described to enhance its procedures for obtaining and verifying information related to the roles, qualifications and experience of those selected to serve on the agency's evaluation teams and decision-making bodies which are utilized for all evaluators, the Commission and IRC. These procedures have been revised as stated with evidence of their effective implementation.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 22 Institutional File-CENSA	Exhibit 22 Institutional File CENSA.pdf		
Exhibit 32a- Evaluator Roster	Exhibit 32a Evaluator Roster.pdf		
Exhibit 33 Council Roster with Resumes	Exhibit 33 Council Roster with Resumes.pdf		
Exhibit 34 Review Board Roster with Resumes	Exhibit 34 Review Board Roster with Resumes.pdf		
Exhibit 42 2016 Department Staff Report	Exhibit 42 2016 Department Staff Report.PDF		
Exhibit 68 Becoming an Evaluator Webpage	Exhibit 68 Becoming an Evaluator Web Page.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		

Exhibit 85 Screenshots of Evaluator Databases and Team Compositions	Exhibit 85 Screenshots of Evaluator Databases and Team Compositions.pdf		
Exhibit 86 Email Communication to Evaluators	Exhibit 86 Email Communication to Evaluators.pdf		
Exhibit 87 IRC Rosters w/Designations and Resumes	Exhibit 87 IRC Rosters wDesignations and Resumes.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide the current roster of council members and appeals panel pool members to demonstrate compliance with this section. The agency must also provide additional information and documentation regarding the executive committee and the IRC to demonstrate compliance with this section. It must provide additional information regarding the required representation on evaluation teams.

Analyst Remarks to Narrative:

The agency's bylaws state the council will include a minimum of two academic and two administrator representatives, and provides definitions for each entity (Exhibit 1, Appendix A). The agency provided the council roster and resumes for members, which appears to meet the requirements of the bylaws and demonstrate academic and administrative representation (Exhibit 33). However, the roster provided is not current at the publication of the draft staff analysis, as it includes members whose terms expired in 2017; therefore the agency needs to provide the current roster of the council to demonstrate compliance.

The agency's bylaws state that an appeals panel will include at least one academic and one administrator representative. The agency provided the roster and resumes of the appeals panel pool and recent appeals panels, which appear to meet the requirements of the bylaws and demonstrate academic and administrative representation (Exhibit 34). However, the roster provided is not current at the publication of the draft staff analysis, as it includes members whose terms expired in 2017; therefore the agency needs to provide the current roster of the appeals panel pool to demonstrate compliance.

The agency states that the executive committee of the council serves as a decision-making body for agency for actions in between council meetings. The agency did not provide a roster of the executive committee for review to determine if it includes academic and administrative representation, as required by this section, nor did it provide any information or documentation regarding a policy or other written directive requiring the composition of the executive committee to include such representation.

The agency states that the Intermediate Review Committee (IRC) serves as an evaluation body for agency. The agency provided the roster and resumes from two recent IRC, which appear to demonstrate academic and administrative representation (Exhibit 87). However, the agency did not provide any information or documentation regarding a policy or other written directive requiring the composition of the IRC to include academic and administrative representation.

Section 2-1-402 of the agency's Accreditation Criteria state that evaluation teams "consist of individuals serving as academic, administrative, public, or member representatives." Based on that statement, it is not clear that the agency has a requirement that both academic and administrative personnel are represented on evaluation teams. The agency provided sample evaluation team rosters throughout the petition that appear to include both academic and administrative representation.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.15(a)(5) Public Representatives

Narrative

ACICS values the participation and contribution of knowledgeable and professional members of the post-secondary education community who are not affiliated with an ACICS institution or related organization. The Council has established requirements for participation by representatives of the public in the evaluation, policy making, decision making, and appeals panel processes.

The ACICS definition for a 'representative of the public' comports with the Department of Education's definition described in CFR §602.3. The ACICS Accreditation Criteria states that representatives of the public "...are persons who are interested in career education; have knowledge or experience useful to the accreditation process; are willing to contribute opinion, advice, and expertise to the endeavors of ACICS and the Council; and are not (1) employed or formerly employed within the last 3 years by an institution or program that either is accredited by the agency or has applied for accreditation; or (2) associated as members of the governing board, owners, shareholders, consultants or in some other similar capacity with an institution or program that either is accredited by the agency or has applied for accreditation; or (3) a member of any trade association or membership organization related to, affiliated with, or associated with the agency; or (4) a spouse, parent, child, or sibling of an individual identified in paragraph (1), (2) or (3) of this definition" (Exhibit 1, Appendix A, Article I, Section 7, p. 97).

The Criteria require public representation on all decision-making bodies. The policy regarding public participation on the Council, which is the only policy making and the primary decision making body of ACICS, requires that "...at least forty (40) percent of the appointed commissioners shall be public representatives..." (Exhibit 1, Appendix A, Article III, Section 1, p. 99). There are currently seven (7) public representatives appointed to serve on the Council (Exhibit 33 Council Roster w/Resumes). The Nominating Committee is responsible for ensuring that nominees for the ACICS Council are appropriately screened and that the representation of the Council meets prescribed policies, including the requirement of public representation.

The Executive Committee, having the authority to make accreditation decisions on behalf of the Council, is also considered a decision-making body as discussed in section §602.15(a)(2). The Committee consists "...of the Chair of the Board of Directors...the Chair-elect of the Board...; the Treasurer; and two additional Directors elected annually..." and includes at least one public representative (Exhibit 1, Article V, Section 2(a), p. 102).

The Review Board of Appeals, which reviews and makes decisions on appealed negative actions of the Council, is required to have "...at least one (1) public, one (1) academic, and one (1) administrative representative" on every Review Board panel (Exhibit 1, Title II, Chapter 3, Section 2-3-602, p.41). ACICS Bylaws specify that Review Board members shall be appointed by the Council as well as their term of service and their absence from the Council for at least the prior year. (Exhibit 34, Review Board Roster w/Resumes). As evidenced, each panel member for each institutional review must attest to their role, including that of the public representative (Exhibit 21, Institutional File-WVBC, pp. 519-539; Exhibit 22, CENSA, pp. 141-154).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 22 Institutional File-CENSA	Exhibit 22 Institutional File CENSA.pdf		
Exhibit 33 Council Roster with Resumes	Exhibit 33 Council Roster with Resumes.pdf		
Exhibit 34 Review Board Roster with Resumes	Exhibit 34 Review Board Roster with Resumes.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide the current rosters of the council and appeals panel pool to demonstrate compliance with this section. The agency must also provide additional information and documentation regarding the executive committee. It must provide documentation that it has vetted the public representatives on the council to ensure they meet the requirements of the agency's definition of a public representative.

Analyst Remarks to Narrative:

The agency's bylaws state that the council and appeals panel include public representation (Exhibit 1, Appendix A). Specifically, the bylaws require the council to include public representatives as at least 40% of its appointed members (not to exceed seven). The bylaws also require an appeals panel to include at least one public representative. The agency's definition of a public representative meets the Department's regulatory definition within the Secretary's Criteria for Recognition.

The agency provided the rosters for the council and the appeals panel pool and resumes, which appear to meet the requirements of the bylaws and demonstrate public representation (Exhibits 33 & 34). However, the rosters provided are not current at the publication of the draft staff analysis, as they include members whose terms expired in 2017; therefore the agency needs to provide the current rosters of the council and appeals panel pool to demonstrate compliance.

Although the agency provided resumes for the public members on the council, the agency did not provide documentation to demonstrate that it has vetted its public members to ensure they meet the requirements of the agency's definition of a public member. Specifically, a resume does not provide documentation to demonstrate compliance with criterion #4 in the agency's definition, nor with part 3 of the Department's definition in Section 602.3. The Department's definition is, as follows:

"Representative of the public means a person who is not--

- (1) An employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that either is accredited or preaccredited by the agency or has applied for accreditation or preaccreditation;
- (2) A member of any trade association or membership organization related to, affiliated with, or associated with the agency; or
- (3) A spouse, parent, child, or sibling of an individual identified in paragraph (1) or (2) of this definition."

The agency provided signed copies of "Review Board Members Classification and Attestation Forms" for appeals panel members (Exhibits 21 and 22), which documents that the agency has vetted the public representatives to ensure they meet the requirements of the agency's definition of a public representative.

The agency also states that the executive committee of the council serves as a decision-making body for agency for actions in between council meetings. The agency did not provide a roster of the executive committee for review to determine if it includes public representation, as required by this section, nor did it provide any information or documentation regarding a policy or other written directive requiring the

composition of the executive committee to include such representation.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.15(a)(6) Conflict of Interest

Narrative

ACICS's policy defines conflict of interest as a commissioner having any interest in an institution appearing before the Council or a commissioner who feels it would not be proper to participate in a decision-making activity directed towards a specific institution. The conflict of interest policy is applied in assigning commissioners to hearing panels that recommend accreditation actions to the Council and to the Council sitting en banc (Exhibit 46, Commissioner Training Manual, p. 20). The same definition applies to Appeal Review Board members who are empaneled to decide appeals of Council decisions (Exhibit 66, Review Board Training Manual, p.9).

All members of the Council and the Review Board of Appeals must review and sign Canons of Ethical Responsibility (i.e. Conflict of Interest) disclosure before every meeting and review (Exhibit 47, Commissioner Conflict of Interest Forms; Exhibit 21, Institutional File-WVBC, pp. 521-539; Exhibit 22, Institutional File-Censa, pp. 144-154). The process has been streamlined for commissioners who are required, prior to accessing the electronic institutional files, to complete the electronic attestation of the Conflict of Interest (Exhibit 46, Commissioner and Board of Director Training Manual, pp.23-25). Also, during Council meetings, commissioners are required to indicate those accreditation files or institutions for which a conflict of interest may arise, (Exhibit 49, Council Abstention Lists) and refrain from participating in discussions on those files and recuse from voting, (Exhibit 45, Sample Council Meeting Minutes, pp. 3-4, 18-19, & 20-21).

Individuals assigned to serve on the Intermediate Review Committee also sign the IRC Conflict of Interest Attestation prior to every scheduled review (Exhibit 88 IRC Training Manual, pp.4-5; Exhibit 89, IRC Conflict of Interest Forms. As a matter of policy, IRC members are not assigned to review a school file from a team visit on which they served as an evaluator.

The ethical expectations of evaluators are expressed at the beginning of the process for vetting, training and selecting members of on-site review teams (Exhibit 69, Visit Evaluation Procedures and Guidelines, p.4; Exhibit 71 Evaluator Training Binder, p.30). Evaluators are informed that the credibility of ACICS accreditation is "based upon the singular integrity of all those individuals charged with the adoption of policies, procedures, and standards and with the evaluation and measurement of institutional performance." Exhibit 69, Visit Evaluation Procedures and Guidelines, p.4). ACICS' policy requires evaluators to "avoid impropriety and the appearance of impropriety," to perform his or her duties "impartially and diligently," and to "refrain from any business activity inappropriate to accreditation responsibilities, including the offering of any materials or information pertinent to the institution's operation or services." Id. The policy further requires evaluators to refrain from the review of "any institution with which he or she has been, is currently, or presently intends to be directly or indirectly involved." Id. Before an evaluator is assigned to a site review visit, he or she must sign and return for the file the Canons of Ethical Responsibility attestation (Exhibit 90, Evaluator Conflict of Interest Forms).

ACICS staff and agency representatives are also required to guard against conflicts of interest, real or perceived. The agency's controls against conflicts of interest are memorialized in written materials that are provided to all staff and representatives as part of their orientation process (Exhibit 91, Staff Handbook, pp. 25, 31-33).

Consultants, serving on behalf of ACICS, are also expected to avoid any appearance of conflict of interest and sign an attestation to that effect (Exhibit 92, Signed Consultant Attestations). Similarly, ACICS utilizes the services of independent contractors as necessary to conduct business on its behalf. The contractor agreements for these individuals include the attestation of not having any interest that will conflict with the duties assigned (Exhibit 93, Contractor Agreements, Item #8).

Relevant ACICS History

In the 2016 Department Staff Report to the Senior Department Official (SDO) ("Staff Report"), on which the Secretary's December 2016 decision denying ACICS recognition was based, Department Staff concerns about whether ACICS had a process to identify any conflicts of interest among IRC members. At that time, ACICS clarified that every IRC member is drawn from the ranks of evaluators who ACICS required to endorse conflict of interest statements before serving as ACICS volunteers in any capacity, including as an evaluator or as a member of the IRC (and submitted evidence of such conflict of interest statements from evaluators who had served as IRC members between 2012 - 2016). ACICS has initiated additional conflict of interest policies and training to ensure all individuals serving ACICS are aware of the ACICS conflict of interest policies and sign conflict of interest statements that applied to their roles at ACICS in any capacity, including on the IRC.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 45 Council Meeting Minutes-December 2016 and April 2017	Exhibit 45 Council Meeting Minutes-December 2016 and April 2017.pdf		
Exhibit 46 Commissioner and Board of Director Training Manual	Exhibit 46 Commissioner and Board of Director Training Manual.pdf		
Exhibit 47 Council Conflict of Interest Forms	Exhibit 47 Council Conflict of Interest Forms.pdf		
Exhibit 49 Sample Council Abstention List	Exhibit 49 Sample Council Abstention List.pdf		
Exhibit 66 Review Board Training Manual	Exhibit 66 Review Board Training Manual.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		
Exhibit 71 Evaluator Training Binder	Exhibit 71 Evaluator Training Binder.pdf		
Exhibit 88 IRC Training Binder	Exhibit 88 IRC Training Binder.pdf		
Exhibit 89 IRC Conflict of Interest Forms	Exhibit 89 IRC Conflict of Interest Forms.pdf		
Exhibit 90 Evaluator Conflict of Interest Forms	Exhibit 90 Evaluator Conflict of Interest Forms.pdf		
Exhibit 91 Staff Handbook	Exhibit 91 Staff Handbook.pdf		
Exhibit 92 Signed Consultant Attestations	Exhibit 92 Signed Consultant Attestations.pdf		
Exhibit 93 Contractor Agreements	Exhibit 93 Contractor Agreements.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide the written policy regarding the assignment of institutions to the IRC members and documentation to demonstrate the use of recusal by the IRC to demonstrate implementation of its conflict of interest policy. The agency must also provide documentation on the use of recusal by the appeals panel pool and evaluators. It must provide documentation on how the agency verifies application of its conflict of interest policy with its administrative staff. The agency must submit the policy that controls against conflict of interest for consultants and contractors. The agency must also provide documentation that an institution has availed itself of the right to request replacement of a site visitor and that the agency provided a replacement. It must provide information and documentation on the existence and activities of its Board of Ethics.

Analyst Remarks to Narrative:

Although the agency states that it has written policies for controls against conflict of interest or the appearance of conflict of interest for all entities to meet this section of the Secretary's Criteria for Recognition, it has not provided sufficient information or documentation to demonstrate compliance.

The agency addresses conflicts of interest for its council, Intermediate Review Committee (IRC), evaluators, and appeals panel pool within its "Canons of Ethical Responsibility." The standards provide examples of common conflicts of interest and require council, IRC, evaluators, or appeals panel pool members to recuse themselves in the case of conflict. The agency provided documentation of signed attestations for the council, IRC, evaluators, and appeals panel to demonstrate that members of those bodies are informed of and acknowledge the standards (Exhibits 21, 22, 47, 89 & 90). The agency also provided the training manuals for each of the bodies, which include additional information on how they are informed of the agency's expectations with regards to conflict of interest (Exhibits 46, 66, 71, & 88).

The agency provided documentation to reflect that the agency uses recusals by council members to guard against conflicts of interest (Exhibit 49). However, the agency did not provide such documentation for its appeals panel pool nor evaluators.

Department staff observed a council member on an evaluation team in January 2018. The council training manual (Exhibit 46, page 50) states that council members could be asked to be on an evaluation team and that they "should recuse themselves from later Council action resulting from such visits." However, the policy does not require recusal and the agency did not provide documentation of such a recusal. In addition, the policy states that the agency "limits the frequency and nature of Commissioner involvement in any but the final stage of the accreditation process." However, Department staff noted that of the 10 institutional examples provided that included site visits that occurred in 2017, four of them included a council member as a member of the site visit team. Therefore, it is not clear that the agency has an effective control against conflict of interest of the appearance of such conflict in this situation.

The agency also stated that "as a matter of policy, IRC members are not assigned to review a school file from a team visit on which they served as an evaluator." However, the agency did not provide the policy where this requirement is written to be enforced, nor did the agency provide an example of the use of recusal by an IRC member.

The agency addresses conflicts of interest for its administrative staff within its orientation process and staff handbook, which includes examples of common conflicts of interest. The staff handbook also states "A current, signed Conflict of Interest Employee Agreement will be kept on file in employee personnel files" (Exhibit 91, page 25). However, the agency did not provide documentation of the use of the referenced "Conflict of Interest Employee Agreement" to demonstrate that administrative staff is informed of and acknowledge the policy.

The agency provided documentation of signed attestations for both consultants and contractors to address conflicts of interest (Exhibits 92 & 93). However, the agency did not provide any information or documentation on any written policy to control against conflicts of interest for such individuals.

Section 2-1-400 of the agency's Accreditation Criteria provides institutions the right to review site visitors on the basis of a conflict of interest. Although the agency provides notification of the right to request replacement in the visit notification letters, the letters alone do not provide documentation that an institution has availed itself of that right and that the agency provided a replacement.

In Exhibit 1, Appendix A, the agency's bylaws include a "Board of Ethics" as a standing committee of the council, whose authority is "to review perceived or actual conflicts of interest by a commissioner or Director and decide if the individual is to be directed to resign." The board is said to consist of two public members and one member affiliated with an ACICS institution. The agency did not provide any information or documentation concerning the existence or activities of this standing committee.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.15(b) Recordkeeping

Narrative

ACICS' document retention policy, as recorded in its Policies and Procedures Manual (Exhibit 6, Chapter 20), comports with the requirements of the Department by institutionalizing a procedure in which ACICS maintains those files included as part of an institution's last full accreditation review – application for initial or renewal of accreditation, self-study, and team report for the visit – for six years or until final action is taken by the Council, whichever is the latter. The period of six years is identified in ACICS' policy as it is the maximum grant length that an institution could be granted by ACICS. The institution's responses to the on-site team report or a Council action letter in regards to its application for accreditation are also an integral piece of the institution's accreditation review, but they are considered "Correspondence that has a Bearing on an Accreditation Action," and are kept permanently per the policy. Reports from special reviews conducted by ACICS also are categorized under "Team Summary Reports," and are kept for the period of six years or until a final action is taken. An institution's Campus Accountability Report (CAR) and Annual Financial Report (AFR) are forms of periodic review reports for an institution which are also maintained by ACICS. The AFRs are included in the document retention policy's "Financial Statements" category, which are kept for six years or until final action is taken by the Council, and the CARs are another correspondence item which have a bearing on accreditation decisions, so they are kept permanently. Further, the document retention policy also complies with the requirements of the Department in its declaration of the permanent retention of all Council Action letters and Council Approval letters for substantive changes, which encompasses all decisions made by the Council on an institution's accreditation and its substantive changes. Any correspondence outside of the Council's letters that is significantly related to those decisions are included in the Council's permanent retention of "Correspondence that has a Bearing on an Accreditation Action."

Following is a description of the ACICS Electronic Data Management (EDM) system, which allows ACICS to comply with the document retention policy stated in its Policies and Procedures Manual:

The ACICS application for an initial grant of accreditation or a renewal of accreditation is an electronic record that is kept active in the ACICS Member Center, which each institution can access, until the application has been approved, denied, or withdrawn. At the time of approval or denial of an application for initial accreditation or a renewal of accreditation, the ACICS Member Center automatically transfers all of the documents uploaded to the application into a folder in the institution's files within the ACICS Electronic Data Management (EDM) system, which is also accessible by the institution. Page 2 of Exhibit 58 (EDM Screenshot) shows a sample of how the EDM system appears to ACICS personnel. The file structure is easily navigable and searchable for necessary documents.

In detail, the application for an initial grant of accreditation or renewal of accreditation contains the institution's application documents, including its self-study; the institution's response to the on-site report; the letter(s) recording the Council's decision(s) on the application based on its most recent review, and any additional or supplemental responses if the Council acted to issue a deferral, compliance warning, or show-cause directive (Exhibit 58, p. 6). All previous letters recording the Council's actions taken on the accreditation of an institution, related to an accreditation application or otherwise, are saved in an EDM group of documents titled "Motion Letters and Action Letters" (Exhibit 58, p. 7). Currently, all Council action letters are now saved in their respective application folders within the EDM.

The on-site evaluation team reports for any visits conducted to the institution, including initial grant visits and renewal of accreditation visits as well as special and unannounced visits occurring between regular reviews, are stored in a separate group of EDM documents in the institution's EDM account, which is marked as "Team Report." Exhibit 58, pp. 4-5, displays team reports for both a renewal of accreditation visit and a special visit to the institution.

The EDM interface collects all approved or denied applications for the institution, which includes both applications for accreditation and substantive change applications made by the institution. In addition, the decision letter for substantive change applications, whether approved or denied, are also included in the institution's EDM file (Exhibit 58, p. 8). Some application files for a substantive change, such as a change of ownership or new location (ex. learning site), include the documents requested for a visit, and any documents from the institution in response to the corresponding evaluation visit report (Exhibit 58, p. 9).

Periodic review reports such as an institution's Campus Accountability Report (CAR) on student achievement and enrollment, and its Annual Financial Report (AFR) are also stored in the ACICS EDM (Exhibit 58, p. 10) or the ACICS CAR portal (Exhibit 58, p. 11). Records relative to institutions not granted accreditation are also maintained in the EDM system for the period of time according to the Council's document retention policy (Exhibit 6, Chapter 20).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 58 EDM Screenshot	Exhibit 58 EDM Screenshot.pdf		
Exhibit 6 Policies and Procedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

The agency has a records management policy, which includes the maintenance of the records required by this section, and indicates where and how records are secured and kept. The agency also provided documentation of such records retained.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(i) Student Achievement

Narrative

ACICS standards effectively address the quality of accredited institutions and programs with respect to student achievement in relation to the institution's mission, course completion, licensing examination, and job placement rates. ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and achievement outcomes, as aligned with its core mission (Exhibit 1, Title I, p. 12). Student learning outcomes involve assessment of skill and competency attainment, including licensure examination pass rates, where applicable. Established standards and benchmarks for retention, placement, and licensure exam pass rates are enforced at the program level and retention and placement at the campus level. Institutions and programs whose rates fall below the standards are subject to adverse actions (Ibid., Appendix L, pp.134-139).

Graduation rate, as an additional measure of student outcomes was reintroduced for evaluation by the Council during its 2016 Systematic Review of Criteria process (Exhibit 23, pp. 1, 34, 70, 81, 105, 206-207, 209-210, 220-221, 237, 239-240, 284, 301, 305, 334-336, 364, 411). As of August 2016, graduation rate must be evaluated at the program and campus level in the Campus Effectiveness Plan (Exhibit 1, Section 3-1-110 and Appendix K, pp. 45-46, 132-133). Visit teams have conducted institutional evaluations which included the review of graduation rates in the CEP (Exhibit 17, Institutional File-ACCT, p. 222; Exhibit 18, Institutional File-Branford Hall, p. 129).

Further, based upon an update report from the staff on the policy initiative directed by the Council at its August 2016 meeting, the establishment of a graduation rate standard to supplement ACICS's longstanding retention rate requirement will be finalized at the December 2017 meeting. The revisions to the Campus Accountability Report (CAR) have included the additional data elements necessary to establish "scheduled to graduate" cohorts for every program offered by ACICS accredited institutions, from which a full year's report (July 1, 2016 – June 30, 2017) will be prepared for the Council's review immediately following the November 1, 2017 CAR submission due date. The conclusion of those preparations along with the expected data analysis that will be made available for the Council's review at its December 2017 meeting, will serve to establish a graduation rate standard for all the various degree and certificate level programs by which institutions would be held accountable.

Institutions and programs are required to bring rates into compliance with the standards within the maximum time frames set forth in Title II, Chapter 3 of the Accreditation Criteria, Exhibit 1, p. 37. If the Council deems an institution or program to be significantly out of compliance relative to student achievement outcomes, with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action, including Withdrawal of Accreditation by Suspension, Withdrawal of Campus Approval from within the accredited status of the institution, or Withdrawal of a Program Approval (Exhibit 1, Appendix L, pp.134-139). ACICS standards provide for enforcement action when student achievement standards do not meet agency requirements, and ACICS has evidence of enforcement of its standards during the past two years. During its last three meetings, the Council took significant program and campus level compliance actions (Exhibit 94, Student Achievement Action Summary).

ACICS evaluates any institutional data it collects in the context of compliance with the Accreditation Criteria. The principal way ACICS collects student achievement data is through the annual CAR (Campus Accountability Report) (Exhibit 1, Section 2-1-809, p. 22). This web-based reporting system calculates retention and placement rates directly from individual student data. The system follows a complex process of verifying and formulating the individual student data collected. To submit the CAR, the campus logs into the ACICS portal and downloads one pre-programmed spreadsheet per approved program. The spreadsheet asks the user for various types of student data, including the scheduled to graduate and start (enrollment) dates. Once completed, the user uploads the spreadsheet back into the portal, after which the system processes the spreadsheet(s) through an error checking process and an analytics engine (that verifies matriculation of a student and placement, among other data points). The system also calculates the placement, retention, and graduation rates by program along with cumulative placement and retention rates at the campus level.

When CAR data are reviewed, the Council is presented with program and campus level trending data to provide a more complete picture of institutional and program performance relative to student achievement standards (Exhibit 95, CAR Analytics w/SA Trending Data). Beginning in 2018, all campuses will be required to complete an updated Quarterly Accountability Report in addition to the annual CAR, with data on retention, graduation, placement, and licensure for all programs (Exhibit 23, Systematic Review of Criteria, pp. 327-328). As explained more fully in response to 34 C.F.R. §602.20, these student outcomes are also considered on an interim basis by the ACICS At-Risk Institutions Group (ARIG).

ACICS also subjects data to additional testing protocol, which has strengthened and replaced the onsite data integrity review, through ongoing and "real-time" verification of the data. The Placement Verification Program (PVP) (Exhibit 6, Policies and Procedures Manual, Chapter 30), requires the monthly submission of placement data which must be verified by the graduate or the employer, and validated by ACICS prior to its inclusion in the annual report (Exhibit 96, CAR & PVP Webinar 2016). Monthly placements submitted to the PVP are continuously evaluated by staff who consult with content area specialists regarding the appropriateness of the placement given the training received in the program. Any placements not verified by the graduate or employer, or those deemed invalid due to insufficient application of skills obtained from the graduate's program, cannot be included in the CAR. Results are shared with the Council and with staff who are trained to conduct further reviews, as appropriate, during on-site visits. If any of the testing protocols reveal inconsistencies or data integrity issues, the institution may be required to subject the data to an independent audit at the institution's expense (Exhibit 97, Living Arts College Show-Cause Directive; Exhibit 98, CSI Adverse Review). These enhancements to the quality of the data have improved confidence in the reliability of information used by the Council to make accrediting decisions.

ACICS has also placed a renewed focus on the accuracy of data that prospective students and the public rely on in making judgments about the overall quality of an accredited institution. Specifically, the Council has strengthened its Performance Information criterion to more clearly identify the types of information that must be disclosed related to each campus and individual programs (Exhibit 1, Section 3-1-704, p. 59).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 23 Systematic Review of Criteria	Exhibit 23 Systematic Review of Criteria.pdf		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		
Exhibit 94 Student Achievement Action Summary	Exhibit 94 Student Achievement Action Summary.pdf		

Exhibit 95 CAR Analytics w/SA Trending Data	Exhibit 95 CAR Analytics wSA Trending Data.pdf		
Exhibit 96 CAR and PVP Webinar 2016	Exhibit 96 CAR and PVP Webinar 2016.pdf		
Exhibit 97 Living Arts Show-Cause Directive	Exhibit 97 Living Arts College Show-Cause Directive.pdf		
Exhibit 98 CSI Adverse Review	Exhibit 98 CSI Adverse Review.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide information & documentation on how it determined that the use of its student achievement rates are sufficiently rigorous to ensure that the agency is a reliable authority regarding the education provided by the institutions it accredits. It must also provide an update regarding its inclusion of standards & benchmarks for graduation rates at the program- & institution-levels. It must provide information & documentation concerning its review of placement rates for institutions with significant international student populations, and State licensing examination rates. It must provide documentation of implementation of its Placement Verification Program. It must also provide documentation to demonstrate systematic implementation and consistent & effective application of its student achievement standards. It must provide information & documentation on the guidance provided to on-site teams to review institutional compliance with the student achievement standards.

Analyst Remarks to Narrative:

The agency provides its expectations regarding student achievement in relation to the institution's mission within Title I, Chapter 1, and Appendix L of the agency's Accreditation Criteria (Exhibit 1).

Under "Definition of Academic Quality" in Title I, Chapter 1 of the agency's Accreditation Criteria, the agency states that it defines "academic quality as the overall performance of the institution in the context of its mission and as measured by the extent to which the institution achieves its intended student learning and achievement outcomes."

Appendix L includes the agency's established standards and benchmarks for retention, placement, and State licensing examination rates at the program-level, and retention and placement rates at the institution-level. It also includes the agency's written procedures for institutions and programs whose rates fall below the standards. The current institution-level retention and placement rate standard is 60% and benchmark is 70%. The current program-level retention rate standard is 60%, and the benchmark is 70% for programs less than one year in length and 65% for those more than one year. The current program-level placement and licensure examination pass rate standard is 60% and the benchmark is 70%. The agency did not provide any information or documentation on how it determined that the use of those rates are sufficiently rigorous to ensure that the agency is a reliable authority regarding the education provided by the programs offered at the institutions it accredits.

Appendix L does not include any standard or benchmark for graduation rates, but the agency stated that it would set such rates at its December 2017 council meeting. Therefore, the agency must provide an update regarding its inclusion of standards and benchmarks for graduation rates at the program and institution-levels.

Section 3-1-110 of the agency's Accreditation Criteria states that an institution must develop and implement a Campus Effectiveness Plan (CEP) that is consistent with the institution's mission and objectives, and which must include the evaluation of retention rates, placement rates and graduation rates. Each institution must evaluate the CEP annually, but the agency only reviews the CEP during an on-site review, or unless requested outside that process. The agency does not appear to require the inclusion of the review of State licensing examination rates in the CEP, and the inclusion of graduation rates began in August 2016. Section 2-1-809 requires the agency to review student achievement annually via the Campus Accountability Report (CAR).

The agency's evaluation process requires an institution to submit its student achievement information and documentation in the CEP with its self-study, and annually in the CAR. Appendix K of the agency's Accreditation Criteria provides guidance to institutions on what types of student achievement data must be included in the CEP and how to review such data to inform the institution's evaluation and planning processes. The CAR Guidelines (Exhibit 152) provides guidance to institutions on how to complete the CAR and provide the required student achievement data. Within the guidelines, the agency provides placement exemptions for specific reasons, which includes visa restrictions for international students (Exhibit 152, page 16). Based on that exemption, it is not clear how the agency assesses placement rates, and therefore student achievement, at its institutions with significant international student populations. Also see concerns raised by a third-party comment, Written Comment #9 - Center for American Progress, regarding placement data for institutions with international students.

The agency states that the self-study is available in advance and on-site for verification by the evaluation team. In addition, institutions are required to provide the most recent version of the CAR for review by the site visitors. That information and documentation is then to be examined and evaluated by the site visitors to assess the institution's compliance with the agency's student achievement standards. The agency provided its Visit Evaluation Procedures and Guidelines (Exhibit 69), however, it only states that the team member reviewing the student relations section must have "familiarity with preparation" of the CAR (page 3), and that the team chair will review the CEP (page 21). Therefore, it is not clear that the agency provides sufficient guidance on how to evaluate institutions to determine compliance with its standards with respect to student achievement while on-site, nor that there is a judgment made about the appropriateness of the measures chosen by the institution within the CEP.

The agency provided a detailed narrative on how an institution provides data to the CAR, via the agency's web-based reporting system, and that the system uses the data to calculate retention, placement, and graduation rates. However, the agency did not provide a clear example of what the CAR actually looks like, to include the specific data requested. The agency did provide documentation of the student achievement analytics reviewed by the council and a summary of agency actions based on student achievement performance (Exhibits 94 & 95).

The agency also provided information on how the placement data submitted in the CAR is verified via its "Placement Verification Program" (PVP), which was implemented on July 1, 2016 for all institutions, per page 120 of the Policies and Procedures Manual (Exhibit 6). Institutions are required to submit placement data to the PVP for verification by graduates and employers prior to inclusion in the CAR. The agency states that the placement data is also reviewed by agency staff to confirm the appropriateness of the placements reported. The agency states in the narrative that the PVP has replaced the data integrity review during on-site reviews. Although the agency provided the policy regarding the PVP and a webinar on the PVP, the agency did not provide documentation of implementation of the program with its institutions. The agency also states that it reserves the right to require an independent audit of the institution's placement data, and provided documentation of the requirement of such an audit (Exhibits 97 & 98). Also see concerns raised by a third-party comment, Written Comment #9 - Center for American Progress, regarding the implementation of the PVP.

The agency provided two institutional examples in this section. One example (Exhibit 17) did not include the self-study as part of the documentation submitted in the renewal of accreditation review, however the site visit report includes information to indicate that student

achievement data from the CEP and the CAR was reviewed and verified by the team and the PVP.

The other example (Exhibit 18) included the CEP and the 2014, 2015 and 2016 CAR data, which reflected that the institution had reported institution-level placement rates below the standard for all three years (58%, 50%, 55%, respectively). The agency acted to withdraw the institution's accreditation in December 2016, and acted to re-evaluate the decision, to include the review of new information, in April 2017, per the agency's policies and procedures. The 2017 mid-year CAR reflected a 58% institution-level placement rate and that the data reported had not been verified in the PVP or via third-party, but the agency acted to rescind its withdrawal action, even though the institution had not demonstrated compliance with its student achievement standard for over three years. This action by the agency does not demonstrate enforcement of its student achievement standards or procedures.

The agency only provided the two examples discussed and they did not demonstrate the consistent and effective application of its student achievement standards. In addition, only one example (Exhibit 18) included a program that requires State licensure for employment, and it did not clearly demonstrate the assessment of such rate by the on-site team or council.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(ii) Curricula

Narrative

ACICS accreditation standards measure the quality of the curricula offered at the program and institutional levels. Title III of the Accreditation Criteria includes a majority of the required standards that are reviewed during the evaluation process. Chapter 1 details the standards applicable to all institutions and Chapters 2-6 contain standards which are particular to each credential level including: nondegree programs, occupational associate's programs, academic associate's programs, bachelor's degree programs, and master's degree programs (Exhibit 1, Accreditation Criteria, Title III, pp. 45-77).

The Accreditation Criteria also details standards specific for courses and programs delivered through distance education (Ibid., Appendix H, Section II (Curriculum and Instructional Delivery), pp. 125); and for direct assessment competency-based education (Ibid., Section I, (Curriculum Development and Direct Assessment Measures), pp. 123-124).

ACICS standards address specific aspects of curriculum quality, including course sequencing (prerequisites), general education, core courses in the major area of study, objectives for each course, and the support provided by the curriculum to the mission of the institution. Well-defined learning objectives and an appropriate sequence of course prerequisites are required (Ibid., Title III, Chapter 1, Section 3-1-532(b), p. 56, and Section 3-1-513(b), pp. 54-55) and must be described in the Catalog (Ibid., Appendix C, 13(a)(b), p. 110) and the Syllabus (Ibid., Glossary, p. 92). Standards for program objectives, the relationship of these objectives to the mission of the institution, the nature and content of courses in the major area of study, and of general education requirements are prescribed in the Educational Activities sections for each credential level, including occupational and academic associate's degree programs (Ibid., Title III, Section 3-3-200, p. 62; Section 3-4-200, p. 66); bachelor's degree programs (Ibid., Section 3-5-200, p. 70); and master's degree programs (Ibid., Chapter 6, Section 3-6-400, p. 74-75).

In developing programs, ACICS requires institutions to pay particular attention to the quality of the curriculum in terms of "sequence of subjects leading to an occupational objective, an academic credential, or both" (Ibid., Section 3-1-513, pp. 54-55). In addition, ACICS standards require objectives for each curriculum to be stated and published (Ibid., Section 3-1-513 (a), p. 54), and that the faculty shall participate in a systematic process of continuous curriculum evaluation (Ibid., Section 3-1-514, p. 54). Further, the curriculum at each credential level "shall quantitatively and qualitatively approximate the standards at other institutions offering" comparable credentialed programs (Ibid., Sections 3-3-203, p. 62; 3-4-203, p. 66-67; 3-5-203, p. 70-71; and 3-6-404, p. 74-75).

ACICS requires active involvement of faculty through the academic governance of the institution (Exhibit 1, Title III, Chapter I, (Section 3-1-501(c), p. 53). The quality of curriculum required for programs leading to certification or licensure are further defined as that which affords "students the opportunity to obtain the minimum skills and competencies to become certified, licensed or registered ..." (Section 3-1-502, p 53). Criteria are also dedicated to Specialized/Programmatically Accredited Programs (Section 3-1-503, p 53).

Standards for curricular quality are applied by ACICS in a number of ways: upon the review of new programs or the revision of existing; as part of the initial or renewal of accreditation process; in the review of complaints and adverse information; and during the review of annual program effectiveness data and reports. Initially, curriculum quality is evaluated when an institution seeks approval for a new program. Information regarding general education requirements, and the mix of instructional contact hours (lab, lecture, externship) is reviewed and verified during the initial application process. In addition, when an institution makes changes to the curriculum that are material to its quality, these revisions must be reported to ACICS and approved as a substantive change or non-substantive change (Exhibit 1, Title II, Chapter 2, Section 2-2-121, p. 27). In all of these cases, ACICS requires an application and conducts a review of the curriculum quality to ensure that the program still meets ACICS standards (Exhibit 59, Non-Sub Change Application Templates; Exhibit 60, Substantive Change Applications and Approval Letters).

The application of the curriculum-specific standards to initial applicants and institutions seeking renewal of accreditation is accomplished through the required self-evaluation (Exhibit 61: Self Study Procedures and Guidelines, p. 21-41; Exhibit 17, Institutional File-Branford, p. 22-86; Exhibit 22, Institutional File-CENSA, p. 1-54) and the report generated by the site visit team (Exhibit 62, Team Report Template, Sections 8, questions 8.01-8.55). In addition, the Council conducts follow-up quality assurance monitoring visits when an institution makes substantive changes to its programs, including its curriculum and generates a report by the site visit team (Exhibit 63, QAM Visit Report Templates). When a program at an institution falls short of standards regarding stated objectives, relevance to the major field of study, general education components, quantitatively or qualitatively approximating the curriculum of other collegiate institutions, or other factors, the institution receives a written report and is required to demonstrate that the finding has been addressed (Exhibit 64: Institutional Files-DuBois, pp. 328, 332-333, 346, 350).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 22 Institutional File-CENSA	Exhibit 22 Institutional File CENSA.pdf		
Exhibit 59 Non-Sub Change Applications	Exhibit 59 Non-Sub Change Applications.pdf		
Exhibit 60 Substantive Applications and Approval Letters	Exhibit 60 Substantive Change Applications and Approval Letters.pdf		
Exhibit 61 Self-Study Guidelines and Procedures	Exhibit 61 Self Study Procedures and Guidelines.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		
Exhibit 63 QAM Visit Report Templates	Exhibit 63 QAM Visit Report Templates.pdf		
Exhibit 64 Institutional File DuBois	Exhibit 64 Institutional File DuBois.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must update its Accreditation Criteria and all other publications regarding the status of the agency's review of doctoral degree programs.

Analyst Remarks to Narrative:

The agency provides its expectations regarding curricula in Title III of the agency's Accreditation Criteria (Exhibit 1). Title III, Chapter 1 includes the standards applicable to all institutions and Chapters 2-6 include the standards which are specific to the credential offered, to include nondegree programs, occupational associate degrees, academic associate degrees, bachelor degrees, and master's degrees.

Section 3-1-500 of the agency's Accreditation Criteria states that an institution must have an educational program that is consistent with the stated mission, be adequate in breadth and context to achieve the mission, and produce measurable results, irrespective of the delivery method of the program. Section 3-1-510 include requirements related to program planning, development and evaluation, to include course scheduling, and clock and credit hour definitions and rationales. Section 3-1-532 states that programs must include systematic planning, well-defined instructional objectives, and the use of appropriate assessment strategies.

Chapters 3-6 of Title III include the standards specific to degree programs. For each degree level, the standards address the program objectives, program length requirements, general education, course sequencing, and core courses in majors or concentration (for academic degrees). Chapter 7 includes standards specific to doctoral degrees, but does not include any notation regarding the permanent moratorium and deadline for such degree programs to obtain new accreditation or be taught out, as included on the agency's website member directory.

Section II of Appendix H of the Accreditation Criteria provides standards specific to programs offered via distance education.

The agency's evaluation process requires an institution to submit its curricula information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's curricula standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69) provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to curricula.

The agency provided three institutional examples in this section that demonstrate that the agency evaluates curricula in conjunction with the agency's standards. One example (Exhibit 22) is for an institution with programs ranging from the certificate to master's degree level and offered via distance education. Another example (Exhibit 64) is for an institution with diploma and occupational associate degree programs. The third example (Exhibit 18) is for an institution with only diploma programs. These examples demonstrate the review of curricula at all levels and via distance education.

The agency stated that the review of curricula standards also occurs in the substantive change process, annual report, and review of complaints. Any analysis regarding the review of curricula standards in those areas will be included in those sections of this report, if applicable.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(iii) Faculty

Narrative

ACICS requirements for faculty as an element of institutional quality reflect the unique mission and purpose of the programs offered, which emphasize professional, technical, and occupational competencies designed to lead to employment. Faculty is engaged in delivering curricula that fulfill the unique mission and purpose of their programs. Faculty members are expected to hold appropriate educational backgrounds and professional experiences, and to participate in curriculum development and revision and professional development activities.

General requirements for all institutions regarding faculty include their participation in the self-evaluation process (Exhibit 1, Title II, Chapter 1, Section 2-1-204, p. 18) and the on-site review by the accreditation team (Ibid., Section 2-1-205, p. 18). In addition, all institutions are expected to demonstrate they have "appropriate faculty" to implement its mission (Ibid., Title III, Chapter 1, Section 3-1-102, p. 45), be organized in a manner that promotes "understanding, cooperation, and responsibility" among faculty and staff (Ibid., Section 3-1-200, p. 45), and that faculty understand and acknowledge their obligations, the standards by which their work will be evaluated, and the documentation of that evaluation (Ibid., Section 3-1-202(b), pp. 46-47).

Based on documented qualifications, faculty is assigned to teach subjects and demonstrate knowledge in specific fields of study sufficient to provide effective instruction. ACICS requires that faculty "be academically and experientially appropriate to the subject matter they teach"; "competent to teach the subject matter being offered"; and have "reasonable latitude in their choice of teaching methods (Ibid., Section 3-1-541, pp. 56-57)." In addition, institutions are required to establish and maintain documented evidence of faculty development plans and achievements, including in-service and professional growth activities, which is updated annually (Ibid., Section 3-1-543, p. 57).

In addition to general standards for faculty that is applied to all institutions, the Accreditation Criteria addresses teaching load, preparation, subject preparation, assignments, stability, and student/teacher ratio for each credential level awarded. Faculty standards specific to non-degree programs are prescribed in Title III, Chapter 2, Section 3-2-100 p. 60; to occupational associate's degree programs in Chapter 3, Section 3-3-300, p. 63; to academic associate's degree programs in Title III, Chapter 4, Section 3-4-300, p. 67; to bachelor's degree programs of study in Title III, Chapter 5, Section 3-5-300 p. 71; and to master's degree programs of study in Title III, Chapter 6, Section 3-6-500, p. 75 (Exhibit 1). These criteria are different depending on the credential level; for example, the academic associate's degree and bachelor's degree level have specific requirements for the qualifications of faculty teaching general education courses, which differ from nondegree, occupational associate's degree, and master's degree levels which have different or no requirements for general education courses (Ibid., Section 3-4-302, p. 67; Section 3-5-302, p. 71).

For institutions offering distance education courses or programs, the requirements for faculty qualifications and involvement in the curriculum are the same as residential courses and programs. There is an additional requirement, though, that faculty must be properly trained to utilize the institution's learning management system for purposes of instruction, communication, and assessment (Ibid., Appendix H, Section II, page 126).

To renew accreditation, every campus must submit an application that includes a faculty/staff summary sheet. The self-study report narrative includes an explanation of faculty involvement and contributions to the implementation of the institution's mission, and academic governance; how the institution ensures that faculty are qualified and meet the Accreditation standard; how the institution ensures that faculty clearly understand their duties and responsibilities; how faculty are monitored and evaluated; and how the administration provides academic freedom for faculty (Exhibit 99, Institutional File-AUHS, pp. 1-106, 107-114).

During each on-site evaluation visit, the evaluation team reviews required documentation of faculty qualifications and experience. The team interviews staff, students, and faculty to evaluate the institution's compliance with the faculty information described in the self-study report. The findings of the team are outlined in the team report template. Section 8 of the report focuses on compliance with faculty standards for each program offered by the institution as evaluated by discipline-specific specialists. Report questions in Section 8 correspond to specific standards regarding faculty credentials, training, evaluation, and development. When a program at an institution falls short of standards regarding faculty requirements, the institution receives a written report and is required to demonstrate that the finding has been remedied (Exhibit 99, Institutional File-AUHS, pp. 144, 166, 179-204).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 99 Institutional File - AUHS	Exhibit 99 Institutional File - AUHS.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide additional documentation to demonstrate consistent application of the agency's faculty standards. The agency must also provide documentation of the review of the faculty for programs offered via distance education, if those programs are to be included within the agency's scope of recognition.

Analyst Remarks to Narrative:

The agency provides its expectations regarding faculty in Title III of the agency's Accreditation Criteria (Exhibit 1). Title III, Chapter 1 includes the standards applicable to all institutions and Chapters 2-6 include the standards which are specific to the credential offered, to include nondegree programs, occupational associate degrees, academic associate degrees, bachelor degrees, and master's degrees.

Section 3-1-540 of the agency's Accreditation Criteria states that an institution must have faculty that are prepared academically and experientially for the subjects taught. Chapters 2-6 of Title III include the standards specific to the credential offered. For each credential level, the standards address the course preparation, teaching load, core faculty, professional development, and faculty academic qualifications. Section II of Appendix H provides standards specific to the faculty of programs offered via distance education.

The agency's evaluation process requires an institution to submit its faculty information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's faculty standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69) provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to faculty.

The agency provided one example (Exhibit 99) in this section for an institution that offers programs at the bachelor's and master's levels and demonstrates the evaluation of faculty in conjunction with the agency's standards. However, the submission of one example does not

demonstrate the consistent application of the agency's faculty standards. In addition, the one example does not demonstrate the review of faculty for programs at all credential levels or offered via distance education, as requested in the agency's scope of recognition.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(iv) Facilities/Equipment/Supplies

Narrative

Facilities, equipment, and supplies that support an ACICS member institution in providing programs designed to educate students in professional, technical, or occupational fields are required to meet specific standards and expectations. The Council prescribes the requirements for facilities, equipment, supplies, and other instructional resources in the context of career education that leads to employment. Specifically, ACICS requires institutions to provide an environment "that is conducive to good instruction and learning" and "supports the educational programs offered by the institution" (Exhibit 1, Section 3-1-600, p. 57). ACICS evaluates the adequacy of the educational environment "against the demands made upon it by the curricula, faculty, and students" See id.

Regarding the quality of support for the program of instruction, Council expects "facilities, instructional equipment, resources, support for modes of instructional delivery, and personnel" to be appropriate to the program (Exhibit 1, Accreditation Criteria, Title III, Chapter 1, Section 3-1-531, pp. 53-54).

Regarding the capacity to support the program of instruction, ACICS requires "that the quantity and type of instructional material and equipment is proportionate to the size of the institution and the nature of the program" (Ibid). The Accreditation Criteria has specific requirements in subsections regarding plant and equipment, including requirements that address general tests of safety, usefulness, cleanliness, maintenance, health, lighting, and compliance with local or state laws and health- and safety-code requirements (Ibid., Section 3-1-600, p. 57). On-site evaluation teams verify that the institution presents satisfactory current fire and safety permits issued by the local government.

Regarding instructional resources, the Council prescribes requirements for instructional resources, audiovisual teaching equipment, and instructional materials, including library resources. A general standard prescribes budget allocations and expenditures for instructional resources, equipment, and materials (Ibid., Section 3-2-200, p. 61). The required level and quality of facilities, supplies, materials, and equipment are prescribed in greater detail within the separate sections dedicated to each credential level (Ibid., Section 3-3-402, p. 64; Section 3-4-402, p. 68; Section 3-5-402, p. 72; Section 3-6-702, p. 76). In addition, qualifications of library staff are prescribed under separate sections for each credential level.

Institutional facilities are reviewed during onsite initial and renewal of accreditation visits. In addition to reviewing documentation of compliance with local and/or state laws governing the physical facilities with respect to fire, safety, and sanitation, the visiting team chair and program specialists also evaluate the facilities with regard to the distribution and appropriateness of the internal and external space. (Exhibit 99, Institutional File-AUHS, Introduction, pp. 119-120; Exhibit 18, Institutional File-Branford Hall, Introduction, p. 125). Institutions are required to document plans to maintain and upgrade facilities, equipment, and supplies, in the Self-Study. (Exhibit 99, Institutional File-AUHS, Self-Study, pp. 1-106; Exhibit 18, Institutional File-Branford Hall, Self-Study, pp. 22-86). ACICS tests the institution's compliance with these requirements through specific sections of the self-evaluation, during the comprehensive review process, and in reviewing complaints and negative external information received in between comprehensive reviews. Failure to demonstrate compliance with ACICS standards regarding support of its instructional programs through its facilities, equipment, or supplies will result in a finding that must be addressed by institution in a timely manner (Exhibit 99, Institutional File-AUHS, Team Report, pp. 128, 146, 166, School Response, pp. 170-175; Exhibit 18, Institutional File-Branford Hall, Team Report, pp. 175, 185, School Response, pp. 220-235).

Institutions offering distance education programs are required to provide an accessible and reliable learning management system and adequate technical support. All support and instructional services must be equivalent in quality and scope to those provided to students enrolled in on ground, campus-based programs (Exhibit 17, Institutional File-ACCT, Distance Education, pp. 470-471). The Campus Effectiveness Plan must include the institution's plans for the location of adequate resources to serve current and future enrollment of distance education students to assure compliance with student achievement standards and student learning outcomes (Exhibit 1, Appendix H, Section II, Institutional Readiness, pp. 124-125).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 99 Institutional File - AUHS	Exhibit 99 Institutional File - AUHS.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

The agency provides its expectations regarding facilities, equipment, and supplies in Title III, Chapter 1 of the agency's Accreditation Criteria (Exhibit 1).

Section 3-1-600 of the agency's Accreditation Criteria states that an institution must provide an environment that is conducive to good instruction and learning and that supports the programs offered. Section 3-1-531 states that an institution must provide appropriate facilities, instructional equipment, resources, and support for modes of instructional delivery, and ensure that the quantity and type of instructional material and equipment is proportionate to the size of the institution and nature of the programs offered.

The agency's evaluation process requires an institution to submit its facilities, equipment, and supplies information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's facilities, equipment, and supplies standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69) provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to facilities, equipment, and supplies.

The agency provided three institutional examples in this section that demonstrate that the agency evaluates facilities, equipment, and supplies in conjunction with the agency's standards (Exhibits 17, 18, & 99).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(v) Fiscal/Administrative Capacity

Narrative

ACICS standards address the quality of the institution or its programs by assessing fiscal and administrative capacity, as appropriate to the institution's specified scale of operations. Specifically, ACICS standards require institutions to demonstrate financial stability and adequate administrative capability to operate effectively (Exhibit 1, Sections 3-1-200, 3-1-202, 3-1-204, and 3-1-300, pp. 46-47).

ACICS reviews financial stability and administrative capacity annually and on an ad hoc basis throughout the accreditation process, including findings identified through the new At-Risk Institutions Group (ARIG). See Section §602.19(b) for further discussion of the ARIG monitoring process. For example, ACICS reviews the current and future budgets of institutions to ensure they are sufficient to accomplish the institution's/program's mission and goals. ACICS reviews the Annual Financial Report (AFR), audited financial statements, and other relevant information to monitor each institution's financial condition. All institutions must submit an AFR (Exhibit 1, Sections 2-1-802 and 2-1-803, p.21). The AFR requires the institution to upload a balance sheet and income statement for each campus. These reports, along with the annual audited financial statements, are reviewed by a staff member in conferral with the Council's Financial Review Committee (FRC). Staff/FRC verifies the accuracy of the report by comparing it to the audited financial statements and applies a scoring rubric for assessing financial stability; reviews the notes to the audited financial statements related to any legal issues or contingencies, failure to meet lender requirements, compliance with the Department's financial responsibility standards; and reports to the Council on these matters (Exhibit 6, Policies and Procedures Manual, Chapter 25; Exhibit 100, FRC Minutes).

Further monitoring in this area includes receipt and review of Title IV compliance audits, information received about the Department placing an institution on HCM1/2 status, high cohort default rates (CDR), and failure to pass 90/10. Actions taken include the request for an Institutional Teach-out Plan or on-site review (Exhibit 101, Request for Teach-Out Plans; Exhibit 102, AMEDCO Unannounced Visit). Based on the numeric values derived from the scoring rubric, a review of the notes, and other considerations, the Council has required institutions to submit a quarterly financial report (QFR), a financial improvement plan (FIP), or both. If the Council requires the institution to submit a QFR or FIP, the institution is notified of the deficiencies, the specific concerns related to the financial criteria, the required remedies, and time frames (Exhibit 103, Council Actions for QFR & FIP). Thereafter, an institution may be required to submit additional financial reports; may be issued a compliance warning, show-cause or other negative action; or may be required to host a special or unannounced visit (Exhibit 104, Financial Show-Cause Actions; Exhibit 105, Herguan Institutional File). If an institution does not meet the agency's financial stability requirements, the institution will be subject to specific requirements, and time frames to come into compliance. Institutions that are not able to demonstrate compliance within the time frames are subject to withdrawal of accreditation.

The Council requires an institution exhibiting a weak financial position such that it calls into question the viability of its continued operation to submit an Institutional Teach-out Plan to ensure an orderly teach-out for its current enrollees (Exhibit 1, Section 2-2-303, pp. 28-29). When a closing institution fails to provide for students in an appropriate manner, members of its executive team and governance body are subject to debarment (Exhibit 1, Section 2-3-900, p.44). Since August 2016, ACICS has debarred seven administrators and/or owners for failing to fulfil their obligations to students and the public (Exhibit 106, Sample Debarment Action Letters). Careful routine monitoring of student achievement rates (described above), along with any financial concerns stemming from financial aid audits are now required to be submitted with the institutions' AFR and are considered at-risk factors that may require follow up or Council action through the ARIG process.

ACICS, through the ARIG, also responds to negative information submitted through complaints, information shared by ED, state agencies or other accreditors or gleaned through media reports. Upon the ARIG's recommendation, the Council can take an investigative action outside the normal review cycle, including the deployment of special teams for unannounced visits. For example, ACICS conducted unannounced visits to MedTech College and Radians College in August 2016 after receiving notice of the U.S. Department of Education's decision to deny certification of another non-ACICS institution under the same ownership because of misrepresentation of placement data (Exhibit 107, MedTech/Radians Adverse). Similarly, ACICS has conducted unannounced visit to Herguan University, AMEDCO, as previously referenced, and SOLEX (Exhibit 10, Denial of Renewal Application-Ineligible, p.54).

In tandem with the annual monitoring of financial stability and fiscal responsibility, ACICS, through the onsite evaluation review evaluates the integrity and capability of the administration (Exhibit 1, Section 3-1-202, p.46). The Council expects that the leadership to place an emphasis on efficiency and effectiveness of the overall administration, as evidenced in the quality of educational resources, management of personnel, integrity of both faculty and staff, and the adoption of appropriate procedures to ensure organizational success. Serious concerns with these critical components of administrative oversight result in findings and subsequent action by the Council (Exhibit 64, Institutional File-DuBois, pp. 300, 351, 352,354; Exhibit 17, Institutional File-ACCT, pp. 224, 283).

Relevant ACICS History

The 2016 Department Staff Report to the Senior Department Official stated that ACICS needed to fully implement its plans to more consistently review and identify at-risk institutions. In addition, the Department stated that ACICS needs to develop and implement its strengthened expectations for visiting teams to more consistently uncover institutional fiscal and administrative problems while on-site (Exhibit 42, p. 2).

ACICS, through more rigorous enforcement of its existing standards and establishment of the ARIG, has considerably strengthened its oversight of accredited institution's fiscal and administrative operations as evidenced in its application of standards to accredited institutions and enforcement action where necessary. A significant aspect of the Department's critique of ACICS standards relative to this criterion were focused on lack of evidence of enforcement of its new ARIG and related standards. As evidenced above, ACICS has significantly strengthened its oversight of the financial and administrative aspects of institutional operations as evidenced by the actions it has taken over the past two years. ACICS has also strengthened its monitoring of student achievement metrics, retention, placement, graduation and licensing, through its Data Integrity Review and Placement Verification Program discussed in Section §602.16(a)(1)(i) of this petition, including DIR training and taking action where warranted.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 10 Denial of Renewal Application - Ineligibility SOLEX	Exhibit 10 Denial of Renewal Application-Ineligibility SOLEX.pdf		
Exhibit 100 FRC Meeting Minutes	Exhibit 100 FRC Meeting Minutes.pdf		
Exhibit 101 Request for Teach-Out Plans	Exhibit 101 Request for Teach Out Plans.pdf		
Exhibit 102 AMEDCO Unannounced Visit	Exhibit 102 AMEDCO Unannounced Visit.pdf		

Exhibit 103 Council Action Letters for QFR and FIP	Exhibit 103 Council Action Letters for QFR and FIP.pdf		
Exhibit 104 Financial Show-Cause Actions	Exhibit 104 Financial Show-Cause Actions.pdf		
Exhibit 105 Herguan Institutional File	Exhibit 105 Herguan Institutional File.pdf		
Exhibit 106 Sample Debarment Action Letters	Exhibit 106 Sample Debarment Action Letters.pdf		
Exhibit 107 MedTech Radians Adverse	Exhibit 107 MedTech_Radians Adverse.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 42 2016 Department Staff Report	Exhibit 42 2016 Department Staff Report.PDF		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		
Exhibit 64 Institutional File DuBois	Exhibit 64 Institutional File DuBois.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide additional information and documentation on how it reviews its institutions for compliance with its fiscal capacity standards. The agency must also provide additional information and documentation on how it has determined that the use of its fiscal capacity standards and monitoring approaches are sufficiently rigorous.

Analyst Remarks to Narrative:

The agency provides its expectations regarding fiscal and administrative capacity in Title III, Chapter 1 of the agency's Accreditation Criteria (Exhibit 1). Section 3-1-204 states that the institution must have adequate revenues and assets to meet its responsibilities, and accomplish of mission. Section 3-1-300 states that the institution must have staff trained to carry out administrative functions and administration to serve its educational mission.

The agency's evaluation process requires an institution to submit its administrative capacity information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. Specifically, the guidelines state that site visitors do not receive or review financial statements, and that financial statements are submitted directly to the agency (Exhibit 61, page 9). The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's administrative capacity standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69) provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to administrative capacity. The agency provided two institutional examples (Exhibits 17 & 64) in this section that demonstrate that the agency evaluates administrative capacity in conjunction with the agency's standards within the accreditation process.

With regards to the review of fiscal capacity, the agency states that it uses its Annual Financial Report (AFR) to collect fiscal information and institutional financial statements, such as a balance sheet and income statement. However, the agency did not provide an example of the AFR to determine what fiscal information is collected, nor does Section 2-1-802 of the agency's Accreditation Criteria provide a description or set requirements. (Section 2-1-803 includes only the requirement to submit audited financial statements annually.) The agency stated that it verifies the AFR by comparing it to the financial statements, but did not provide documentation of such review. The agency provided minutes from its Financial Review Committee (FRC) to demonstrate review of the AFR (Exhibit 100), and the scoring rubric used by the FRC to determine fiscal stability (Exhibit 6, page 77). The agency states that the council reviews the information provided by the institution and the recommendation of the FRC to determine its action, and the agency provided council action letters as documentation of such review and action (Exhibits 103 & 104). However, the institutional example (Exhibit 105) provided to support the use of unannounced visits based on the review of the AFR was not a result of such review, but instead based on the institution's termination from access to Student and Exchange Visitor Information System (SEVIS).

The agency also states that it reviews notifications received from the Department's Office of Federal Student Aid (FSA), in the form of program reviews, HCM1/2 actions, 90/10 reviews, and Cohort Default Rate (CDR) actions. Even though the agency provided two examples of the request of teach-out agreements (Exhibit 101) in response to action taken by FSA, such significant action based on information from FSA's review of financial statements does not demonstrate that the council has its own effective monitoring approach to review fiscal capacity. The agency also provided an example of an unannounced visit based on an FSA action (Exhibit 102), but it did not include any information or documentation concerning the review of the financial capacity or stability of the institution by the agency. Also see concerns raised by a third-party comment, Written Comment #14 - TCF, regarding action taken after another oversight entity has already taken action.

In addition, the agency did not provide sufficient documentation of the review of FSA notifications regarding program reviews, 90/10 actions or CDR actions in the agency's monitoring of fiscal capacity, as stated by the agency. Department staff noted that the agency provided the meeting minutes for one FRC that indicates the review of limited 90/10 and composite score information (Exhibit 100, page 7), but no action was taken and the documentation of one set of meeting minutes is not demonstrative of consistent and effective evaluation by the agency.

Based on the documentation provided, the agency has not demonstrated that the agency evaluates fiscal capacity in conjunction with the agency's standards within the accreditation process. In addition, the agency did not provide any information or documentation on how it determined that the use of its fiscal capacity standards and monitoring approaches are sufficiently rigorous.

The agency stated that the review of fiscal capacity standards also occurs by the ARIG, which is discussed in Section 602.19(b).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(vi) Student Support Services

Narrative

As reflected in the ACICS value statement, "ACICS is committed to the importance of a quality educational experience for all students" (Exhibit 108, "About Us" Screenshot). Regardless of any unique demographics or economic characteristics, continuous awareness of the education experience of all students is a priority for the Council. The standards for academic advising and support systems are designed to encourage academic success.

Students who enroll in programs designed to prepare them for employment in professional, technical, and occupational fields have unique needs and expectations. ACICS expects that support services provided by member institutions directly address the targeted career outcomes, unique economic circumstances, and demographics of their students compared to students participating in more traditional higher education programs. Students attending ACICS institutions are more likely to lack family financial support, have children at home, work full-time, and have a household income that places them at or below the federal poverty level.

The Council expects that student support services reflect "the highest ethical standard" and "conform to all applicable laws and regulations." The program of student support services provided by each institution must be consistent with its stated mission, including services provided to students attending branch campuses, learning sites, and enrolled in distance education courses and programs (Exhibit 1, Section 3-1-400, p. 48).

At a minimum, ACICS institutions are required to have one experienced person on staff to counsel students on personal or academic problems and job placement opportunities. Institutions are expected to have orientation activities to assist new students in adapting to the institution. In addition, ACICS expects the institution to have a system of educational, occupational, and personal advising; an emphasis on student success through retention activities and program completion; and documented employment assistance. Retention and completion are emphasized in these standards in terms of the students' "academic and socioeconomic characteristics." Further, ACICS requires institutions to document the counseling they provide students regarding student loans (Ibid., Section 3-1-441, p. 52).

Another area of student services required by ACICS is the administration of financial aid. The Council acknowledges that participation in state and federal student financial aid programs requires "serious responsibility," and expects all institutions participating in federal or state student financial aid programs to be knowledgeable of and in compliance with applicable laws and regulations. ACICS requires institutions to have at least one professionally qualified administrative staff person and an appropriate set of financial controls (Ibid., Section 3-1-434, pp. 51-52). A thorough review of the administration of financial aid is conducted during all on-site visits, including special visits. If the on-site team finds concerns with any aspects of the administration of financial aid, the institution is required, at a minimum, to respond to the finding, and any subsequent requests or actions as directed by Council (Exhibit 109, Institutional File-NWSC, pp. 125-168). In addition, ACICS has specific requirements related to satisfactory academic progress and as part of this process, ACICS requires that the institution "[encourage] and assists students who are experiencing difficulty in progressing satisfactorily in their programs" (Exhibit 1, Section 3-1-423, p. 50).

ACICS considers access to an effective grievance process integral to quality in student services. Institutions must establish, publish, and implement policies and procedures for considering complaints received from students (Ibid., Section 3-1-202(d), p. 47). The grievance procedures must include publication of information regarding contacting ACICS.

Careful recordkeeping is crucial to verifying the effective implementation of student support services. ACICS requires that all such records be available at each institutional site during evaluation visits. Council standards for recordkeeping include the requirement that all basic records and reports pertaining to students shall be safely protected from theft, fire, water damage, or other possible loss (Ibid., Section 3-1-303(a)(f)(g), pp. 47-48). Additional information regarding the maintenance and protection of online student academic records and personally identifiable information is addressed in Section §602.17(g) of this petition.

The opportunities for ACICS to evaluate the quality and sufficiency of student services include review of the self-evaluation narrative (Exhibit 61, Self Study Procedures and Guidelines, Questions 4.7-4.20, pp. 18-21), observations, interviews, and documents reviewed during site visits (Exhibit 62, Team Report Template, Questions 5.39).

In addition, prior to an on-site evaluation students and staff are requested to complete a call for comment form to provide any information about the institution and during the on-site evaluation visit, students are requested to complete an online survey that indicates their level of satisfaction with a variety of factors, including several that directly impact the quality of student services (Exhibit 21, Institutional File-WVBC, pp. 211-216, 425-426; Exhibit 64, Institutional File-Dubois, pp. 280-286, 416).

Based on information derived from on-site visits, the review of adverse information or complaints, and annual CAR, if Council determines that the institution is not providing sufficient or appropriate student support services, it will require the institution to demonstrate compliance with this standard in a reasonable timeframe (Exhibit 109, Institutional File-NWSC, p. 15-16, 24; Exhibit 17, Institutional File-ACCT, pp. 445, 473).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 108 About Us Screenshot	Exhibit 108 About Us Screenshot.pdf		
Exhibit 109 Institutional File-NWSC	Exhibit 109 Institutional File-NWSC.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 61 Self-Study Guidelines and Procedures	Exhibit 61 Self Study Procedures and Guidelines.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		
Exhibit 64 Institutional File DuBois	Exhibit 64 Institutional File DuBois.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

The agency provides its expectations regarding student support services in Title III, Chapter 1 of the agency's Accreditation Criteria (Exhibit 1).

Section 3-1-400 of the agency's Accreditation Criteria states that an institution must provide a program of student services that is consistent with its stated mission, including services provided for students attending branch campuses and learning sites. Section 3-1-441 states that an institution must provide a staff member experienced with counseling students on personal or academic problems and employment opportunities. The same section states that institutions provide a system of educational, occupational, and personal advising; employment assistance; and student loan repayment counseling. Section 3-1-434 states that an institution must provide a staff member to administer any state or federal student aid programs.

Section 3-1-800 provides the agency's standards regarding library resources and services that are applicable to all institutions, to include that those resources are appropriate to the academic level and scope of the institution's programs. Title III, Chapters 2-6 include the additional standards regarding library resources and services which are specific to the credential offered, to include nondegree programs, occupational associate degrees, academic associate degrees, bachelor degrees, and master's degrees. Section II of Appendix H of the Accreditation Criteria provides student support services standards specific to programs offered via distance education.

The agency's evaluation process requires an institution to submit its student support services information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's student support services standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69) provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to student support services.

The agency provided four institutional examples in this section that demonstrate that the agency evaluates student support services in conjunction with the agency's standards (Exhibits 17, 21, 64, & 109).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(vii) Recruiting & Other Practices

Narrative

The ACICS Standards for recruitment, advertisement, admissions and grading begin with the Accreditation Criteria on Integrity which states: "The integrity and capability of an institution is manifested by the professional competence, experience, personal responsibility and ethical practices demonstrated by all individuals comprising the ownership, control or management" (Exhibit 1, Section 3-1-202, p.46). This criterion requires institutions to assume full responsibility for the actions, statements and conduct of its representatives and further delineates responsibilities for careful selection training, supervision and evaluation. See Id. Specific criteria on admissions and recruitment are set forth in Sections 3-1-410, 3-1-411, and 3-1-412 of the Accreditation Criteria. (Ibid., pp. 49-50). The criteria require that the admissions policy conforms to the institution's mission, is publicly stated, and administered as written. Recruiting must be ethical and compatible with the educational objectives of the institution. Disclosures to students describing the program, financial obligations, applicable policies and procedures, and program and institution level performance data must be accurate, not exaggerated or misleading. The institution is required to maintain documentation that it systematically monitors its recruitment activities (Exhibit 23, Systematic Review of Criteria, p. 90). Compliance with these expectations is evaluated by ACICS during the onsite review and results in a finding if not appropriate or adequate. (Exhibit 64, Institutional File-DuBois, pp. 320-323). These areas are also evaluated during special visits to ensure an ongoing monitoring of activities (Exhibit 109, Institutional File-NWSC, pp. 9-10).

ACICS continually assesses the recruiting process. During the re-accreditation process, ACICS has a program to seek out further information from students, faculty and staff prior to the evaluation visit through a "Call for Comment" process (Exhibit 21, Institutional File-WVBC, pp. 211-216; Exhibit 64, Institutional File-DuBois, pp. 280-286). This complements the general call for comment by ACICS when initial applicants and those seeking renewal of accreditation are publicly posted at www.acics.org, and informs the accreditation process. Onsite teams are trained to monitor admissions personnel and activities including listening in on recorded or live calls, reviewing text/instant messages and reviewing training manuals and scripts (Exhibit 69, Visit Evaluation Procedures and Guidelines, p. 23). Further, when ACICS receives information in any form about an institution that may be violating ACICS Criteria in this regard, the facts are reviewed by the At-Risk Institution Group, which has authority to conduct mid-cycle reviews of institutions through unannounced visits, limited-announced visits, or heightened monitoring requiring a specific response from the institution to be reviewed by the Council (Exhibit 110, Summary of ARIG Investigations). The Council also utilizes secret shopper services, as deemed appropriate, to investigate aggressive recruiting tactics (Exhibit 25, SIBA Secret Shopper Review).

ACICS Accreditation Criteria also require institutions to include within their catalogs specific information related to transparency in the admissions process including transfer of credit policies, accreditation status – institutional and programmatic, calendar, definition of credit, cost, scholarships and other information (Exhibit 1, Section 3-1-303(e), p. 48; Appendix C, pp. 109-112; Exhibit 62, Team Report Template, Section 6, pp. 35-42). With respect to grading, the Accreditation Criteria require institutions to publish and follow a clear and explained grading system as published in a catalog (Exhibit 1, Appendix C, pp. 109-10). The Criteria also require disclosure in catalogs of all requirements for certification, licensing, or registration in the program career field, as appropriate; and (f) any additional or special requirements for completion (such as practica or externships). (Ibid., p. 110).

Relevant ACICS History

In the 2016 Department Staff Report to the Senior Department Official ("Staff Report"), Exhibit 42, p. 2, the Department stated that ACICS needed to "fully implement its new and strengthened initiatives regarding misrepresentations to prospective students and abusive recruiting and regularly verify that each institution's recruitment process is complying with the new ACICS requirements." The Report recognized evidence ACICS presented about ongoing visiting team evaluation of compliance with these criteria and evidence of sanctions imposed by ACICS based on deficiencies in these categories. See id. pp. 14. However, the Department concluded that the agency's process for implementing its standards in this area were not sufficiently effective, citing a significant number of state attorneys general settlements against ACICS accredited institutions in the past based on alleged violations of state misrepresentation law. The Department stated that "a comprehensive and workable plan for remedying this deficiency in the agency's accreditation process is required, as well as any changes it has made already to ensure compliance with this section."

In response, as detailed above, ACICS has strengthened its standards that apply to recruiting practices by requiring each institution maintain documentation that it systematically monitors its recruitment activities and testing compliance with these expectations during the onsite reviews that have resulted in findings under these standards. Further, ACICS has established the Call for Comment process prior to visits to solicit information about school practices and an At-Risk Institutions Group to strengthen its monitoring and investigation of at-risk institutions, including based on information from states, the Department or other sources regarding investigations, complaints or other adverse action against the institution. As discussed in Section §602.16(a)(1)(ix) and 602.16(a)(1)(x) of this petition, ACICS has also initiated more robust tracking and response to complaints as well as enhanced reporting to the Department regarding Title IV related compliance issues. ACICS also provides evidence of effective implementation of these standards over the last two years.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 109 Institutional File-NWSC	Exhibit 109 Institutional File-NWSC.pdf		
Exhibit 110 Summary of ARIG Investigations	Exhibit 110 Summary of ARIG Investigations.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 23 Systematic Review of Criteria	Exhibit 23 Systematic Review of Criteria.pdf		
Exhibit 25 SIBA Secret Shopper Review	Exhibit 25 SIBA Secret Shopper Review.pdf		
Exhibit 42 2016 Department Staff Report	Exhibit 42 2016 Department Staff Report.PDF		
Exhibit 64 Institutional File DuBois	Exhibit 64 Institutional File DuBois.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide documentation of the review of the recruiting, admissions, and advertising for programs offered via distance education, if those programs are to be included within the agency's scope of recognition.

Analyst Remarks to Narrative:

The agency provides its expectations regarding recruiting, admissions, and advertising in Title III, Chapter 1 and Appendix C of the agency's Accreditation Criteria (Exhibit 1). The agency states that institutions are governed by Section 3-1-202, which states that institutions demonstrate integrity via its ethical practices, and that the institution is fully responsible for the actions, statements, and conduct of its representatives.

Section 3-1-411 of the agency's Accreditation Criteria states that the admissions policy must conform to the institution's mission, be publicly stated, and administered as written. Section 3-1-412 states that recruiting must be ethical and compatible with the educational objectives of the institution. Section 3-1-700 includes the requirements relative to advertising and that institutions must publish a catalog. Appendix C provides greater detail as to what must be included in the catalog, such as academic calendar and grading system, and that all advertising must avoid leaving any false, misleading, or exaggerated impression about the institution. Section II of Appendix H of the Accreditation Criteria provides recruiting, admissions, and advertising standards specific to programs offered via distance education. Also see concerns raised by a third-party comment, Written Comment #9 - Center for American Progress, regarding the agency's admissions standards.

The agency's evaluation process requires an institution to submit its recruiting, admissions, and advertising information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's recruiting, admissions, and advertising standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69) provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to recruiting, admissions, and advertising.

The agency provided three institutional examples in this section that demonstrate that the agency evaluates recruiting, admissions, and advertising in conjunction with the agency's standards (Exhibits 21, 64, & 109). The agency also provided documentation that it utilizes "secret shopper" services, as necessary, in its review of recruiting activities (Exhibit 25). However, the agency did not provide any documentation of the review of recruiting, admissions, and advertising for programs offered via distance education.

The agency stated that the review of recruiting, admissions, and advertising also occurs by the agency's At-Risk-Institution's Group (ARIG), but provided no specific information or documentation to support that statement in this section. Department staff noted that the agency provided Exhibit 110 as documentation of the ARIG's work, but the exhibit includes a list and brief summary of the institutions reviewed by the ARIG - not the specific issues - which does not demonstrate the review of recruiting, admissions, and advertising compliance issues by the ARIG. The ARIG is also discussed in Section 602.19(b).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(viii) Program Length

Narrative

ACICS standards specify measures of program length and related factors regarding credit hour definition and allocation.

ACICS requires a minimum of 60 semester-hour credits, 90 quarter-hour credits, or their equivalent, typically earned over two academic years, for program completion to award an occupational or academic associate's degree (Exhibit 1: Sections 3-3-202 and 3-4-202, pp. 62 and 66). Requirements for awarding a bachelor's degree include the completion of 120 semester-hour credits, 180 quarter-hour credits, or the equivalent, typically earned over 8 semesters, 12 quarters, or the equivalent (Ibid., Section 3-5-202, p. 70). The requirements to award a master's degree include 30 semester-hour credits, 45 quarter-hour credits, or the equivalent, of course work plus a graduate-level thesis; or 36 semester-hour credits, 54 quarter-hour credits, or their equivalent, of graduate-level course work if no thesis is required; typically earned over three semesters, five quarters, or the equivalent (Ibid., Section 3-6-403, p. 74).

ACICS standards for course and program measurement are specified in the Accreditation Criteria (Ibid., Section 3-1-516(a), p. 55). Using the standard federal definition of a credit hour and commonly accepted practice for relating the clock hours of lecture to laboratory to practicum, ACICS requires that one quarter-hour credit of instruction equals, at a minimum, 10 hours of lecture (plus out-of-class student work) or 20 hours of laboratory or 30 hours of practicum. One semester-hour credit of instruction equals, at a minimum, 15 hours of lecture (plus out-of-class student work) or 30 hours of laboratory or 45 hours of practicum.

ACICS maintains program information for each institution's approved programs, which includes information regarding the program length. All new program applications submitted to ACICS include questions regarding program length (Exhibit 111, New Program Application Sample w/ E-mail Correspondence, pp. 212-217). Upon review of this application, if there is any program length that is more than one standard deviation from the mean of similar programs, that institution is contacted and required to provide a reasonable explanation for this difference (Exhibit 111, New Program Application Sample, w/ E-mail Correspondence, p. 1).

Credit awarded for courses or programs delivered through nontraditional methods (e.g., distance education or independent study) generally do not use the standard formulas for credit calculation (Exhibit 1, Section 3-1-516(b), pp. 55-56). The rationale used for the credit calculation delivered through nontraditional methods must be submitted to the Council for pre-approval, and the institution must demonstrate the clock or credit hours awarded are appropriate for the credentials offered. For example, by demonstrating that students completing programs or courses delivered through nontraditional methods have acquired equivalent levels of knowledge, skills, or competencies to those acquired in traditional formats. The Distance Education Application requires the institution to clearly outline the types of online activities and/or direct classroom activities in the case of hybrid courses that contribute to the granting of specified numbers of credits for each course (Exhibit 112, Distance Education Application).

ACICS has requirements for program objectives that indicate that there are appropriate subjects that lead to an occupational objective (Exhibit 1, Section 3-1-513, p. 54). In addition, ACICS requires that institutions publish in their catalog those objectives as well as the length of each program, the minimum number/types of credits, prerequisites and other essential information regarding each curricula (Exhibit 1, Section 3-1-513(a)(b), pp. 54-55 and Appendix C, pp. 109-113).

The Self-Study Report and the Renewal of Accreditation Report templates demonstrate how ACICS implements and evaluates these standards (Exhibit 61, Self-Study Guidelines and Procedures, Section 5, pp. 21-29; Exhibit 62, Team Report Template, Section 5, pp. 24-32). If an institution is offering programs that do not meet these standards, it is notified in writing through the on-site evaluation visit report (Exhibit 22, Institutional File-CENSA, p. 105; Exhibit 64, Institutional File-DuBois, pp. 315, 328, 332-334, 338).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 111 New Program Application Sample w/Email Correspondence	Exhibit 111 New Program Application Sample w Email Correspondence.pdf		
Exhibit 112 Distance Ed Application (Valley College)	Exhibit 112 Distance Ed Application (Valley College).pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide information and documentation on the annual review of program lengths required within its Accreditation Criteria.

Analyst Remarks to Narrative:

The agency provides its expectations regarding program length and objectives in Title III of the agency's Accreditation Criteria (Exhibit 1). Title III, Chapter 1 includes the standards applicable to all institutions and Chapters 2-6 include the standards which are specific to the credential offered, to include nondegree programs, occupational associate degrees, academic associate degrees, bachelor degrees, and master's degrees.

Section 3-1-513 of the agency's Accreditation Criteria states that educational programs must follow a well-organized sequence of appropriate subjects that lead to an occupational objective, an academic credential, or both. Section 3-1-516 include requirements related to clock hours, credit hours, and rationales for measurement of non-traditional delivery of courses or programs. Chapters 3-6 of Title III include the specific credit requirements for program length of each degree program, and include program objectives.

Appendix C of the Accreditation Criteria require institutions to publish program objectives and the total number of credits or clock hours to complete each program. Section II of Appendix H provides program length and objectives specific to programs offered via distance education.

Although not mentioned in the narrative, Section 2-1-807 of the agency's Accreditation Criteria states that the agency will determine average program lengths based on information collected in the Campus Accountability Report (CAR). The section also states that institutions with program lengths that are more than one standard deviation from the average will be required to submit an explanation of the deviation. The agency did not provide any information or documentation concerning this review of program length.

The agency's evaluation process requires an institution to submit its program length and objectives information and documentation with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's program length and objectives standards. The agency's Visit Evaluation Procedures and Guidelines (Exhibit 69)

provides site visitors with the guidance on what to evaluate in self-studies and on-site to determine compliance with its standards with respect to program length and objectives.

The agency provided two institutional examples in this section that demonstrate that the agency evaluates program length and objectives in conjunction with the agency's standards (Exhibits 111 & 112).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(ix) Student Complaints

Narrative

The agency's record of complaints is incorporated into the on-site initial evaluation or re-evaluation process and serves to inform the Council when making an accreditation decision (Exhibit 1, Appendix B, p. 107-108; Section 2-3-700, p. 43). ACICS staff coordinators, and all commissioners, can access the complaint record for every campus at all times, and specifically during the evaluation of an application, via the ACICS Member Center (Exhibit 113, Screenshot of Complaints Submission Module). Evidence to support any information provided in closed/resolved complaints is verified during the onsite visit, and any open complaints are incorporated into the team's investigation and review via interviews and document review. Complaints may also be identified to the agency through the pre-visit Call for Comment tool and during the onsite Student Survey that are incorporated by ACICS into all visits. These additional sources are recorded in the team's report and may result in findings (Exhibit 21, Institutional File-WVBC, pp. 211-216, 217-359, 425-426; Exhibit 64, Institutional File-Dubois, pp.280-289, 416). Further, if a complaint is received while the team is onsite, the ACICS staff member is provided with the information from the office and directed to conduct additional investigation of the allegations. This is also incorporated into the report and may also result in findings, for which the campus must provide a response to the Council (Exhibit 114, Communication with Coordinator Onsite). Finally, during final consideration of the institution's application, the Council will review and consider complaints and will defer or take other actions as appropriate (Exhibit 115, South Baylo Initial Application).

The Council's At-Risk Institutions Group (ARIG), which meets monthly as well as on an ad hoc basis, is composed of the President of ACICS and other senior staff. The ARIG, as part of its evaluation, reviews complaints and negative information and prepares a report that is considered by the Council (Exhibit 116, ARIG Report to BPC). The ARIG looks to discern any pattern of high risk which requires further review and/or investigation. ARIG also reviews this information at regular intervals between Council meetings and, where applicable, initiates a deeper investigation through an unannounced/limited announced visit or prepares a report for consideration and review by the Council's Executive Committee (EC) (Exhibit 117, ARIG Meeting Minutes). The EC will take action, as warranted, between Council meetings, including initiating a show-cause directive. ACICS has conducted 54 visits based on ARIG reviews since the committee was first established (Exhibit 110, Summary of ARIG Investigations).

Relevant ACICS History

The 2016 Department Staff Report to the Senior Department Official ("Staff Report") concerning ACICS's compliance with this criterion stated that ACICS needed "to continue implementing its strengthened process for obtaining and evaluating the record of student complaints for each institution ... and needs to compile evidence that its strengthened process is effective in practice" (Exhibit 42, pp. 15-16). In the above response, ACICS has detailed its current system for maintaining records of complaints and its actions utilizing complaint information to evaluate and resolve issues raised by student complaints through its agency enforcement procedures. The Department called for "a comprehensive and workable plan for remedying this deficiency in the agency's accreditation process" with respect to acting on complaints and "evidence of the process' effectiveness." The agency's response to this criterion indicates both a workable and comprehensive system for recording and acting on complaint information, as well as evidence of effective implementation of that system.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 110 Summary of ARIG Investigations	Exhibit 110 Summary of ARIG Investigations.pdf		
Exhibit 113 Screenshot of Complaints Submission Module	Exhibit 113 Screenshot of Complaints Submission Module.pdf		
Exhibit 114 Screenshot of Complaints Submission Module	Exhibit 114 Communication with Coordinator Onsite.pdf		
Exhibit 115 South Baylo Initial Application	Exhibit 115 South Baylo Initial Application.pdf		
Exhibit 116 ARIG Reports to BPC	Exhibit 116 ARIG Report to BPC.pdf		
Exhibit 117 ARIG Meeting Minutes	Exhibit 117 ARIG Meeting Minutes.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 42 2016 Department Staff Report	Exhibit 42 2016 Department Staff Report.PDF		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide additional information and documentation on how it assesses an institution's student complaint policy while on-site, and the guidance provided to site visitors on how to evaluate such compliance. The agency must also provide information and documentation to demonstrate that it assesses an institution's student complaint policy, and whether the nature, substance, or pattern of complaints provides any information relevant to the institution's compliance with the agency's standards or other requirement.

Analyst Remarks to Narrative:

The agency provides its expectations regarding student complaints in Section 3-1-202(d) and Appendix C of the agency's Accreditation Criteria (Exhibit 1). The agency requires an institution to establish, publish, and implement appropriate grievance policies and procedures, to include the name and address of ACICS.

The agency's evaluation process requires an institution to submit its student complaint information with its self-study. The agency's Self-Study Procedures and Guidelines (Exhibit 61) provides guidance to institutions on the content, structure and evidence to demonstrate compliance with standards. The agency states that the self-study is available in advance and on-site for verification by the evaluation team. That information and documentation is then examined and evaluated by the site visitors to assess the institution's compliance with the agency's student complaint standards. In addition, the agency stated that complaints received by the agency are incorporated into on-site reviews, when possible, so that the evaluation team can review any allegations and include the information and documentation into the report. The agency provided its Visit Evaluation Procedures and Guidelines (Exhibit 69), however, it does not appear to include any guidance on the review of student complaints. Therefore, it is not clear that the agency provides sufficient guidance on how to evaluate institutions and determine compliance with its standards with respect to student complaints while on-site.

The agency provided two institutional examples in this section that demonstrate that the agency evaluates student complaints in conjunction with the agency's standards (Exhibits 21 & 115). Although the agency provided information and documentation concerning student complaints

received and reviewed by the agency, it did not provide any information or documentation to demonstrate that the agency assesses an institution's student complaint policy, nor whether the nature, substance or pattern of complaints provide any information relevant to the institution's compliance with the agency's standards or other requirements.

The agency stated that the review of student complaints also occurs by the agency's At-Risk-Institution's Group (ARIG), and provided Exhibit 110 as documentation of the ARIG's review of complaints. The ARIG is also discussed in Section 602.19(b).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(a)(1)(x) Title IV Responsibilities

Narrative

Monitoring compliance with Title IV program responsibilities occurs as a part of the comprehensive review during on-site evaluations and as part of other ACICS evaluation standards (Exhibit 1, Section 3-1-434, pp. 51-52; Section 2-3-700, p. 43; Section 2-1-810, p. 22; Appendix G, pp. 120-121; Appendix D, pp. 114-116). An institution's record of compliance is also reviewed annually as part of the financial review process described in this petition under section 34 C.F.R. § 602.16(a)(1)(vi) and has resulted in agency action (Exhibit 103, Council Action Letters QFR/FIP; Exhibit 104, Financial Show Cause Actions). Institutions are required to submit financial aid audits to ACICS on an annual basis and, effective January 2017, must also submit a copy of their Title IV compliance audit as part of this submission (Exhibit 23, Systematic Review of Criteria, p.280; Exhibit 1, Section 2-1-803, p.21). Consequently, at its April 2017 meeting, the Financial Review Committee considered these Title IV Compliance areas (Exhibit 100, FRC Meeting Minutes, p.7). Title IV Compliance is also reviewed through the At-Risk-Institution's Group (ARIG) process any time ACICS receives information regarding a Title IV compliance concern from any source, and may include a request for an Institutional Teach-Out Plan, (Exhibit 101, Request for Teach-Out Plans). This also includes monitoring of Cohort Default Rates (CDRs). Institutions with rates higher than federal standards are subject to additional monitoring and reporting (Exhibit 6, Policies and Procedures Manual, Chapter 29; Exhibit 1, Section 2-1-810, p. 22.)

Relevant ACICS History

The 2016 Department Staff Report to the Senior Department Official ("Staff Report"), stated with respect to this criterion that "the Department cannot see how the agency could apply [its policy and procedure] revisions in such a way as to document effectiveness in monitoring ... particularly in view of its weak record in monitoring and failure to document enforcement, and prior lack of cooperation with the Department" (Exhibit 42, p. 2). The Department concluded in that report that the agency's Title IV standards and process for implementing them was ineffective because the Department investigated Title IV fraud by an ACICS-accredited institution, Michigan Jewish Institute (MJi), for which ACICS renewed the school's accreditation and did not share certain agency findings with the Department (Ibid., pp. 16-17). The report concluded that "the agency's conduct with respect to the MJi and the Department indicates that the agency does not effectively apply its standards and policies regarding compliance with Title IV" and that "...the agency must explain what changes it has made and will make that ensure it is consistently effective with respect to Title IV compliance." See Id.

ACICS has strengthened its policies and procedures for monitoring institutional Title IV compliance, as described above, and provides evidence of effectively application of its standards and closer cooperation with the Department in sharing information. The ARIG, in particular, which evaluates risk factors at accredited institutions including CDRs, program review and audit findings, and other information, has become a valuable means for ACICS to receive and act on relevant information in a timely manner to avoid delay between regular visits.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 100 FRC Meeting Minutes	Exhibit 100 FRC Meeting Minutes.pdf		
Exhibit 101 Request for Teach-Out Plans	Exhibit 101 Request for Teach Out Plans.pdf		
Exhibit 103 Council Action Letters for QFR and FIP	Exhibit 103 Council Action Letters for QFR and FIP.pdf		
Exhibit 104 Financial Show-Cause Actions	Exhibit 104 Financial Show-Cause Actions.pdf		
Exhibit 23 Systematic Review of Criteria	Exhibit 23 Systematic Review of Criteria.pdf		
Exhibit 42 2016 Department Staff Report	Exhibit 42 2016 Department Staff Report.PDF		
Exhibit 6 Policies and Prodedures Manual	Exhibit 6 Policies and Procedures Manual.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide information and documentation to demonstrate that the review of an institution's Title IV responsibilities is included within the agency's evaluation process. The agency must also provide documentation that its standards require the submission of information and documentation sufficient to review and make a determination regarding an institution's Title IV record of compliance.

Analyst Remarks to Narrative:

The agency states that its expectations regarding Title IV responsibilities are clearly included within the agency's Accreditation Criteria (Exhibit 1). Section 3-1-434 states that all institutions participating in state or federal student financial aid programs must be knowledgeable of and in compliance with applicable laws and regulations, and Section 2-1-810 states that the council will monitor an institution's student loan cohort default rates.

The agency also stated that it reviews an institution's Title IV record of compliance in its fiscal capacity and annual monitoring reviews, as included in Sections 602.16(a)(1)(v) and 602.19(b). Specifically, the agency states that it requires each institution to submit a copy of its Title IV compliance audit as part of its submission of its annual financial statements and cited Section 2-1-803 of its Accreditation Criteria. However, there is no such requirement to submit a Title IV compliance audit included in Section 2-1-803. In addition, there does not appear to be any requirement within the agency's Accreditation Criteria for an institution to provide the results of financial or compliance audits or program reviews by the Department to the agency. Section 2-1-810 states that the agency will "monitor an institution's student loan cohort default rates" and an institution "may be subject to additional reports or actions based upon these rates," but there is no indication on how the review will be conducted or any benchmarks for additional reports or actions.

The examples provided in this section (Exhibits 103 & 104) do not demonstrate that council action taken or information requested was relative to the review of an institution's Title IV record of compliance, but rather overall fiscal capacity. For Exhibit 103, the only language included in the example letters relative to Title IV compliance is the request for "Any correspondence to or from the U.S. Department of Education regarding the institution's compliance with the financial responsibility requirements or other Title IV matters." For Exhibit 104, the language included in the letters is for the institution's or each institution in a school group's "status regarding the participation in Title IV funding programs, which includes any actual or potential limitations, suspensions or terminations from any Title IV funding source for whatever reason, and the institution's plans for dealing with any potential or actual interruption of Title IV revenues." Therefore, these examples do not demonstrate the agency's review of Title IV responsibilities by its institutions.

As noted in Section 602.16(a)(1)(v), the agency also states that it reviews notifications received from the Department's Office of Federal

Student Aid (FSA), in the form of program reviews, HCM1/2 actions, 90/10 reviews, and Cohort Default Rate (CDR) actions. The agency provided documentation regarding its action taken in response to FSA notifications regarding composite scores (Exhibit 101), but as noted in Section 602.16(a)(1)(v), it did not provide sufficient documentation of the review of FSA notifications regarding program reviews, 90/10 actions or CDR actions in the agency's monitoring of fiscal capacity. Department staff noted that the agency provided the meeting minutes for one Financial Review Committee (FRC) that indicates the review of limited 90/10 and composite score information (Exhibit 100, page 7), but no action was taken and the documentation of one set of meeting minutes is not demonstrative of consistent and effective evaluation by the agency.

In this section, the agency did not provide any information or documentation of its review of an institution's Title IV responsibilities within the evaluation process. Specifically, the agency did not include any information or documentation of the requirement of an institution to submit such information and documentation within the self-study, the guidance provided to institutions with regard to Title IV responsibilities, the availability and evaluation of such information and documentation by the site visitors, the guidance provided to site visitors for such a review, or any institutional examples that demonstrate that the agency evaluates Title IV responsibilities in conjunction with the agency's standards within the accreditation process.

The agency stated that the review of Title IV responsibilities also occurs by the agency's At-Risk-Institution's Group (ARIG), but provided no information or documentation to support that statement. Department staff noted that the agency provided Exhibit 101 as documentation of the ARIG's work, but the exhibit only included two council action letters and two related FSA letters, which do not demonstrate review specifically by the ARIG nor the review of any other Title IV compliance issues by the ARIG. The ARIG is also discussed in Section 602.19(b).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.16(b)(c) Distance/Correspondence Education

Narrative

ACICS's scope of recognition was expanded to include the evaluation of the quality of instruction offered through distance education (DE) in 2006 (Exhibit 214, 2006 ED Expansion of Scope – DE). Since then, ACICS has successfully and consistently held institutions accountable for the quality of their DE offerings in delivery, oversight, and outcomes. DE is considered a mode of delivery that an institution may seek approval to add to its residential program as a substantive change (Exhibit 1, Accreditation Criteria, Sections 2-2-101(d) and 2-2-106, pp.23 and 25). Consequently, DE is evaluated at the campus level, through the requirements of Appendix H (Ibid., pp.124-126); in addition to the general standards applicable to all institutions in Title II, Chapter 1, and the standards at the applicable credential in Chapters 2 through 6. See id. Therefore, institutions offering DE are expected to demonstrate the quality of its DE program through all its academic and administrative operations.

During the renewal or initial accreditation application process, institutions are required to complete all sections of the self-study narrative in addition to a supplemental distance education profile that provides specific information on the DE activities at the institution (Exhibit 120, Renewal Self-Study Narrative, pp.130-145). In its responses, the institution must demonstrate institutional readiness, including a plan to implement DE instruction. The plan, at a minimum, must include the rationale, resources, course/program objectives, content, and student assessment. Further, the institution must describe how DE is offered, who is responsible for its overall administration, how the activity is incorporated into its effectiveness planning, how admissions requirements are disclosed in the catalog, and any additional requirements for DE. Student privacy measures through the identity verification process must be clearly articulated and verifiable; an orientation must be provided to students; there must be evidence of appropriate faculty and instructional support; and curriculum and instructional delivery must be congruent with the program offerings. The self-study narrative is the basis for the onsite evaluation review which verifies the information through observation, interviews, and interaction. Exhibit 215, DE Application and Evaluation Process, describes the application and evaluation process for Distance Education.

Course content must be similar between residential and online offerings to include measures of program length and credits awarded, as determined by the review of online and residential course syllabi, academic credit analyses, and online discussions. In instances where that is not the case, a finding will result with a response on corrective action required (Exhibit 17, Institutional File ACCT, pp.278-279 and 281). Further, the competence, quality, and qualification of faculty are also evaluated consistent with the expectations of residential instruction. Faculty who teach both online and residentially must have evidence of training to provide online instruction, in addition to the academic and experiential qualifications for their assignments (Exhibit 62, Team Report Templates, pp.60, Q.A.21 and A.23). The institution must demonstrate that online faculty are not only involved in curriculum development and review but that they are consistently evaluated with development plans and performance evaluations (Exhibit 1, Appendix H, Section II, Faculty and Instructional Support, pp. 125-126). The DE activities must be managed by an individual qualified by both experience and academic preparation (Exhibit 120, Renewal Self-Study Narrative, Q. 9.4, p.133; Exhibit 17, Institutional File ACCT, p.276; Exhibit 112, Distance Ed Application-Valley, p. 144).

Resources and equipment are evaluated for distance education as it would be for residential programs, and the institution is required to demonstrate that it has the financial resources to support this mode of delivery. Library resources must be equivalent and may include a virtual library. Further, there must be evidence that the institution provides support services, such as counseling, academic advising, financial aid, and employment assistance, that are the same or equivalent to that offered to residential students (Exhibit 62, Team Report Templates, Q.A.26 – A.28). Any unique admissions and technical requirements must be fully disclosed in the catalog, along with full disclosure of any additional charges or fees that are associated with online education, and the security processes in place to protect student identity (Exhibit 17, Institutional File ACCT, p. 278; and Exhibit 112, Distance Ed Application Valley, pp. 145-146).

Through the Campus Accountability Report (CAR) submission, ACICS collects data on DE activity at the program level to determine the percentage of students enrolled DE courses/programs. However, there is no separation in the expectations of outcomes for DE as they relate to student achievement standards of Appendix L (Exhibit 1, pp. 134-139). Institutions offering courses and/or programs through distance education are expected to meet the minimum student achievement standards with sanctions enforced as described in §602.16(a)(1)(i). Exhibit 216 (Miller Motte Withdrawal, Paralegal) is an example of a withdrawal of program approval action taken and affirmed for a program that reported a high DE enrollment, but failed to meet student achievement standards.

Finally, student complaints are reviewed and investigated with no distinction between residential or DE delivery and the processes, as articulated in §602.16(a)(1)(ix) and §602.23(c)(1)(2)(3). Because DE is considered an expansion of the institution's scope of accreditation, its record of compliance with Title IV program responsibilities would be consistent with that previously addressed. That is, the institution's program audit, the results of program reviews, default rate data, 90/10 compliance and other information provided by the Secretary would be incorporated into ACICS's accreditation process.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 214 2006 ED Expansion of Scope – DE	Exhibit 214 2006 Expansion of Scope - DE.PDF		
Exhibit 215 DE Application and Evaluation Process	Exhibit 215 DE Application and Evaluation Process.pdf		
Exhibit 216 Miller Motte Withdrawal, Paralegal	Exhibit 216 Miller Motte, Paralegal.pdf		
Exhibit 86 Email Communication to Evaluators	Exhibit 86 Email Communication to Evaluators.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide documentation to demonstrate the review of programs offered via distance education programs against all of the agency's standards.

Analyst Remarks to Narrative:

The agency is requesting to include the approval of programs offered via distance education within its scope of recognition, but is not requesting the inclusion of those offered via correspondence education. The agency states that it applies all standards equally to programs offered residentially and via distance education. In addition, the agency has specific requirements for programs offered via distance education, as included in Section II of Appendix H of the agency's Accreditation Criteria (Exhibit 1), and are sufficiently specific in identifying the agency's expectations. The agency's definition of distance education meets the regulatory requirements.

After an initial review for capacity via the substantive change process, the agency assesses distance education programs in conjunction with its accreditation review of institutions. The agency provided some examples (in other sections of the petition) to verify the agency's review and evaluation of programs via distance education against most of the agency's standards.

The agency must still provide documentation to demonstrate the review of programs offered via distance education programs against all of the agency's standards, as noted in Section 602.16(a)(1)(vii). In addition, the agency has not demonstrated that the review is conducted by council members with experience and training with programs offered via distance education, as noted in Section 602.15(a)(2).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.17(a) Mission & Objectives

Narrative

ACICS' Accreditation Criteria require institutions to have a clearly specified mission and programs that are supported by and aligned with career objectives. Specifically, to be eligible for accreditation by ACICS the institution's mission must be "to offer educational programs that help students develop skills and competencies to enhance their careers" (Exhibit 1, Section 1-2-100(c), p.14). In addition, the Accreditation Criteria require institutions to have a mission statement and a set of objectives which, together, accomplish the purpose of the institution: "The objectives must be devoted substantially to career-related education and should be reasonable for the program of instruction, mode of delivery and facilities of the institution" (Ibid., Section 3-1-100, p.45). Further, "The mission statement of the institution, its purpose and supporting objectives must be stated in the catalog and other publications readily available to the public. The mission statement must be expressed in terms readily understandable by a prospective student, parents, the public and other educational institutions" (Ibid., Section 3-1-101, p. 45).

At the beginning of the accreditation process, the institution's self-evaluation narrative requires disclosure and explanation of its mission and educational objectives (Exhibit 61, Self-Study Guidelines and Procedures, pp. 11, 14, 17, 21, 37-38). Consequently, the onsite evaluation team assesses if and how the institution's educational objectives are consistent with its mission, which could result in a finding (Exhibit 135, BAAN File, p. 92). Further, when seeking approval to offer add new programs, institutions must demonstrate that the program objectives are congruent with the institution's mission (Exhibit 111, New Program Application Sample, p.6). Specifically, "An institution applying for the inclusion of an academic associate's degree program shall demonstrate that its programs, courses, and services are appropriate to its mission and to its specific goals and objectives" (Exhibit 1, Section 3-4-201, p. 66).

ACICS evaluates whether a campus or program is successful in achieving its stated objectives, emphasizing graduation, licensure, and employment as important indicators of achieving objectives in career-based programs. Specifically, ACICS has established both campus- and program-level student achievement standards and benchmarks for retention, placement, and licensure, where applicable. These are set forth in Appendix L of the Accreditation Criteria (Exhibit 1, Appendix L, pp. 134-139). Each main and branch campus is required to submit retention, placement, and licensure rate data each year on the Campus Accountability Report (CAR). (Ibid., Section 3-1-203, p. 47). The data are reviewed by the Council to determine compliance with the standards and Appendix L sets forth a series of sanctions and Council-directed activities which guide the Council's decision-making relative to compliance. An institution or program reporting a rate below established standards is subject to reporting, compliance warning, show cause, or immediate adverse action (Ibid., Appendix L, pp. 134-139). With respect to implementing this standard, since adopting Appendix L, the Council has taken a range of actions in which institutions and programs were found to be deficient in meeting outcomes standards (Exhibit 94, Student Achievement Action Summary; Exhibit 20, Sample SA Withdrawal Letters; and Exhibit 136, SA Actions). To enhance monitoring processes, beginning in February 2018, institutions are required to submit the accountability report on a quarterly basis, for the period beginning July 2017. The annual report will be a compilation of the quarterly submissions thus allowing ACICS the ability to better monitor the student achievement performance of its institutions on a more frequent and regular basis. In addition, placement data are reviewed via monthly submissions by institutions and verified through ACICS' Placement Verification Program (PVP) which facilitates ongoing monitoring of placement outcomes.

The CAR is an important part of determining if stated objectives are being achieved during site visits. The team chair examines student achievement outcomes in the Campus Effectiveness Plan (CEP) and evaluates the campus's own assessment of its effectiveness in achieving its mission and objectives as reflected in these and other outcomes. The CEP includes the institution's plans for improvement of programs, services and performance and the team evaluates the institution's success in doing so (Exhibit 18, Institutional File-Branford Hall, pp.87-118 and 129; Exhibit 137, Forrest College CEP Review, pp. 1-29, 38-40, 88).

With respect to implementing this standard, during onsite evaluation reviews when the team is unable to confirm the accuracy and validity of the data reported, the institution will receive a finding, with an opportunity to respond to the Council (Exhibit 138, DIR Team Reports, pp. 29, 32, 40-41, 43-44, 55, 107, 108, 116, 124, 182). The Data Integrity Review role has been strengthened and is now served by the ACICS staff representative who works intimately with the in-house PVP analyst, and who better understand the nuances of the CAR and disclosure requirements. The team's report and, ultimately, Council decisions relative to institution and program effectiveness are informed by this verified data. The Living Arts College review provides evidence of the implementation of the DIR to ACICS' process (Exhibit 97, Living Arts College Show-Cause Directive, p.1).

ACICS requires that degree and certificate requirements conform to commonly accepted standards for content and rigor at each level respectively. Specifically, requirements for non-degree programs and degree programs through the master's degree are outlined in Title III, Chapters 2-6 of the Accreditation Criteria, pp. 60-77. Each distinct section sets forth the requirements for faculty credentialing and experience, curriculum content, general education, program length, and credit awards for each degree level (Ibid., Sections 3-3-203, p.62; 3-4-203, p. 66-67, and 3-5-203, p.70-71).

The Accreditation Criteria also require instructional procedures, texts, and materials for degree programs to be appropriate to the purposes, curriculum, and standards of collegiate institutions. Through the team report and the institution's response, the Council is able to evaluate how an institution is achieving its stated objectives and whether its educational requirements comply with commonly accepted standards for the degree and correlating career objective (Exhibit 62, Team Report Template, Questions 9.35, 9.40, 9.46, and 9.53). When an institution fails to demonstrate that it is fulfilling its stated mission, purpose or goals, the Council takes appropriate action consistent with the Criteria and requires a response to the finding and evidence of appropriate adjustments to its program(s) (Exhibit 139, Institutional Reviews-Conformity).

Relevant ACICS History is found in Exhibit 140.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 111 New Program Application Sample wEmail Correspondence	Exhibit 111 New Program Application Sample w Email Correspondence.pdf		
Exhibit 135 BAAN File	Exhibit 135 BAAN File.pdf		
Exhibit 136 SA Actions	Exhibit 136 SA Actions.pdf		
Exhibit 137 Forrest College CEP Review	Exhibit 137 Forrest College CEP Review.pdf		
Exhibit 138 DIR Team Reports	Exhibit 138 DIR Team Reports.pdf		
Exhibit 139 Institutional Reviews-Conformity	Exhibit 139 Institutional Reviews-Conformity.pdf		
Exhibit 140 Relevant ACICS History-602.17(a)	Exhibit 140 Relevant ACICS History 602.17a.pdf		

Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 61 Self-Study Guidelines and Procedures	Exhibit 61 Self Study Procedures and Guidelines.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		
Exhibit 94 Student Achievement Action Summary	Exhibit 94 Student Achievement Action Summary.pdf		
Exhibit 97 Living Arts Show-Cause Directive	Exhibit 97 Living Arts College Show-Cause Directive.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide documentation that it has an effective mechanism for evaluating an institution's compliance with the agency's standards, to include achieving its stated objectives.

Analyst Remarks to Narrative:

The agency requires, in Section 1-2-100(c) of its Accreditation Criteria (Exhibit 1), that institutions maintain career objectives consistent with its mission and program offerings. In addition, the agency requires that institutions demonstrate they are successful in achieving the stated objectives by utilizing a Campus Effectiveness Plan (CEP), as stated in Section 3-1-110 of the Accreditation Criteria. Specifically, the CEP requires the inclusion of specific student outcome measures in the assessment and improvement of an institution, to include educational objectives. The agency includes its specific requirements for each distinct degree level and certificate requirements to conform to commonly accepted standards in Title III, Chapters 2-6 of the Accreditation Criteria. The agency evaluates the appropriateness of the mission and objectives for the programs delivered and degrees awarded during each review of accreditation.

The agency states that it has qualitative and quantitative program effectiveness and student outcomes measures by which it assesses an institution's success in achieving its objectives and mission goals. The agency states that it evaluates the appropriateness of the mission and objectives for the programs delivered and degrees awarded during the on-site evaluation, primarily via the CEP. The agency provided one example to verify its review and evaluation of the mission and objectives of an institution and determination if it is successful in achieving those objectives (Exhibit 135).

For the assessment of qualitative and quantitative program effectiveness and student outcomes measures, the agency states it uses the Campus Accountability Report (CAR). Each institution is required to provide a completed CAR annually, and it is reviewed by the council. The CAR is also reviewed by the evaluation team while on-site. The agency provided examples of the review of the CAR by the council to demonstrate it evaluates whether an institution is successful in achieving its stated mission (Exhibits 18 & 137). However, as noted in Section 602.19(b), it is not clear that the CAR is an effective mechanism for evaluating an institution's compliance with the agency's standards. Also see concerns raised by a third-party comment, Written Comment #14 - TCF, regarding the effective evaluation of institutions.

Although the agency did not provide a specific example with regard to credential review in this section, the example provided in this section and those provided throughout the petition demonstrate that the agency requires its institutions to adhere to commonly accepted standards for degree and certificate programs.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.17(b) Self-Study

Narrative

In-depth self-evaluation is a fundamental requirement for all institutions seeking accreditation through ACICS, whether initial or renewed. It is valued as the most critical aspect of the accreditation process, as it necessitates the involvement of several key stakeholders, and facilitates the comprehensive assessment of an institution's educational quality. The development of the self-study promotes ongoing and systematic analysis of an institution's adherence to its mission; the Accreditation Criteria; and evaluation of its educational quality, anticipated outcomes, and student success.

ACICS provides written guidance on completing the Self-Study in several forms, including the Accreditation Criteria, Self-Study Guidelines, and a required Accreditation Workshop. The self-evaluation standard details specific requirements for the preparation of a self-study by initial applicants and institutions applying for new grants of accreditation, respectively, are detailed in the Accreditation Criteria (Exhibit 1, Sections, 2-1-203, 2-1-204, and 2-1-301, p. 18; Sections 2-1-500, 2-1-502, 2-1-602, and 2-1-700, pp. 19-21).

ACICS provides additional guidance through the Self-Study Procedures and Guidelines, (Exhibit 61) which are available on the ACICS website – www.acics.org. The self-study process requires institutions to reflect upon and report practices, policies, and procedures for institutional operations, including mission, institutional effectiveness, organization, administration, relations with students, admissions and recruitment, standards for satisfactory academic progress, financial relations, student services, educational activities, program administration, credentials conferred, instruction, faculty, educational facilities, publications, and library resources and services (Ibid., pp. 11-34). The culminating narrative document is presented to the Council and the evaluating team as an authentic representation of the institution. (Exhibit 18, Institutional File-Branford Hall, pp. 22-86; Exhibit 99, Institutional File-AUHS, pp. 1-106). The process of preparing the self-study reveals specific strengths and areas for improvement, which institutions are encouraged to include as baseline data in their Campus Effectiveness Plan (CEP).

Applicants for both initial and new grants of accreditation are required to attend an Accreditation Workshop (Exhibit 1, Section 2-1-100, p. 17). The purpose of the workshop, in part, is to provide guidance to the institutional representative on how to prepare a self-study, which is detailed in the training materials. (Exhibit 118 a & b, Accreditation Workshops). In accordance with these policies and procedures, institutions complete and submit their self-evaluation reports. (Exhibit 119, Initial Self-Study Narrative; Exhibit 120, Renewal Self-Study Narrative). The questions posed in the self-study require institutions to assess and describe their strengths and weaknesses, and attest to their compliance with ACICS standards. See id. As evidenced on slides 23-26 in the Initial Accreditation Workshop PowerPoint and slides 24-28 of the Renewal Accreditation Workshop PowerPoint (Exhibit 118 a & b, Accreditation Workshops) the purpose of the self-study is also stressed during Accreditation Workshops. Institutions receive clear guidance on the use of the self-study to conduct a thorough evaluation and identify areas for improvement, as well as to document specific activities and demonstrate compliance with Accreditation Criteria.

The Accreditation Criteria specifies the submission schedule for the self-study, which allows site evaluators to review the self-study for completeness and compliance prior to the site visit. It is due three months prior to an institution's scheduled review cycle to allow time for the staff and evaluating team to review the documents for completion and compliance with agency standards. (Exhibit 1, Sections 2-1-300, p. 18; 2-1-402, p. 19; 2-1-503, p. 20). Additionally, the Accreditation Criteria states that "institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials, which are due two weeks prior to an on-site visit" (Exhibit 1, Section 2-1-100 p. 17). The purpose of this requirement is to ensure that the preparation and submission of the self-study will be informed by the workshop.

Both the Visit Confirmation Memo and Visit Memo sent to the institution prior to the visit detail submission requirements for the self-study as well. (Exhibit 21, Institutional File-WVBC, pp. 187, 189-190, 196-197). Further, a letter is also sent to institutions approximately 18 months prior to the expiration of their grant, detailing the requirements and submission schedule applicable to the application of a new grant (Exhibit 121, Renewal of Application Reminder Letters). All application forms and guidelines for submitting the self-study and related documents are available on the ACICS website: www.acics.org. The completed self-study narrative and all required attachments and deposits must be received before an on-site visit can be scheduled (Exhibit 1, Section 2-1-400, p. 19). If an institution has not completed the self-evaluation process by the required timeframe, the visit will be postponed and the institution may receive a non-compliant action. (Exhibit 1, Section 2-1-300, p. 18; Exhibit 122, Visit Postponed-No Self Study Communication). In addition, if the institution provides inaccurate or insufficient information in the self-evaluation report than the institution would receive a finding in that area of the report and would be required to submit a written response (Exhibit 123, ACCT Team Report-Alhambra, pp. 5).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 118 a- Initial Accreditation Workshop	Initial Accreditation Workshop Spring 2016.pptx		
Exhibit 118 b- Renewal Accreditation Workshop	Renewal Accreditation Workshop Fall 2016.pptx		
Exhibit 119 Initial Self-Study Narrative	Exhibit 119 Initial Self-Study Narrative.pdf		
Exhibit 120 Renewal Self-Study Narrative	Exhibit 120 Renewal Self-Study Narrative.pdf		
Exhibit 121 Renewal of Application Reminder Letters	Exhibit 121 Renewal of Application Reminder Letters.pdf		
Exhibit 122 Visit Postponed-No Self Study Communication	Exhibit 122 Visit Postponed-No Self Study Communication.pdf		
Exhibit 123 ACCT Team Report-Alhambra	Exhibit 123 ACCT Team Report - Alhambra.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 99 Institutional File - AUHS	Exhibit 99 Institutional File - AUHS.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

The agency includes the requirement to provide a comprehensive self-study for each institution within Title II, Chapter 1 of its Accreditation Criteria (Exhibit 1). The agency's "Self-Study Procedures and Guidelines" provides its written policies and procedures with regard to the preparation of such a self-study. In addition to the guidelines, the agency requires attendance at an accreditation workshop before starting an accreditation review process, and provided documentation of those workshops. The agency provided documentation in this section (Exhibits 18, 21, & 99) and throughout the petition of the implementation of its policies with regard to the self-study.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.17(c) On-Site Review

Narrative

The ACICS program of accreditation includes a review and evaluation of substantial direct evidence collected during site reviews to determine whether an institution or program complies with published standards. Site visits are conducted with applications for accreditation, re-accreditation, and certain substantive change reviews, as well as periodic quality monitoring visits as directed by the Council or through the At-Risk Institutions Group (ARIG) (Exhibit 1, Accreditation Criteria, Section 2-1-205, p.18; 2-1-400, p.19; and 2-2-201, p. 27). On-site review teams visit every campus at least once during the accreditation cycle with an average ACICS accreditation grant length of 3-4 years and the maximum being six years (Ibid., Section 2-1-701, p. 21). In addition, the Council conducts regular quality assurance monitoring visits based on substantive changes initiated and may also order a team visit if "...it has received adverse information or when general operations of the institution may be called into question" (Ibid., Appendix B, pp. 107-108).

The Council establishes the procedures for visits and sets expectations for each team member's review. Generally, the team is required to verify information in the application and self-study, to report on its observations of the institution's performance relative to mission and compliance with the Accreditation Criteria (Ibid., Sections 2-1-501, 2-1-502, p. 20). In gathering information, the team is required to consult with faculty, administrators, students and the chief on-site administrator and to document observations and interviews in writing, contribute to a comprehensive team report that is conveyed to ACICS and to the institution (Ibid., Section 2-1-503, p. 20; Exhibit 71, Evaluator Training Binder, pp.11-14). To help ensure that sufficient information is obtained by the team, a checklist is provided to the institution of materials and documents that must be assembled before the site visit (Exhibit 64, Institutional File-Dubois, pp. 266-267; Exhibit 17, Institutional File, ACCT, pp. 208-209). While on-site, team members review those materials, including student records, and student achievement outcome data on retention and placement rates provided by the institution. In addition, the team reviews faculty and administrative staff records and publications, classrooms and instructional resources, and equipment and educational facilities. Subject matter specialists evaluate and review each program's area of study and conducts extensive interviews of staff, faculty, and students (Exhibit 69, Visit Evaluation Procedures and Guidelines, pp. 25-30). At the conclusion of the visit, the team conducts an exit interview to report its draft findings to the administration.

The size, composition, and responsibilities of all on-site review teams are prescribed in the Council's published policy document. Teams are composed of "educators, executives and practitioners," (Exhibit 1, Section 2-1-400, 2-1-401, p. 19), and based on "type and size of the institution, programs offered, mode of educational delivery," and other factors, see id.

In addition to this required visit at least once during the evaluation cycle, if, through a complaint or other means, ACICS becomes aware of information that an institution or campus may be violating ACICS Criteria, the institution or campus will be subject to review by the At-Risk Institutions Group. Heightened investigatory procedures may include an unannounced visit or limited-announced visit (Exhibit 110, Summary of ARIG Investigations). ACICS has conducted 54 visits where concerns presented during monitoring were investigated through ARIG procedures.

Relevant ACICS History

Regarding this criterion, the 2016 Department Staff Report to the Senior Department Official ("SDO") stated that ACICS needed to provide evidence that its regular on site visit process currently and consistently obtains sufficient information to determine if the institution complies with ACICS standards. The response above explains the changes that the agency has made to ensure it consistently obtains sufficient information during an on-site evaluation to make a reliable compliance determination sufficient to satisfy this criterion.

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 110 Summary of ARIG Investigations	Exhibit 110 Summary of ARIG Investigations.pdf		
Exhibit 17 Institutional File-ACCT	Exhibit 17 Institutional File ACCT.pdf		
Exhibit 64 Institutional File DuBois	Exhibit 64 Institutional File DuBois.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		
Exhibit 71 Evaluator Training Binder	Exhibit 71 Evaluator Training Binder.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must revise its documentation concerning its publication of the Department's requirements concerning on-site reviews.

Analyst Remarks to Narrative:

Section 2-1-400 of the agency's Accreditation Criteria include the requirement for an on-site review for any institution seeking an initial or renewal grant of accreditation (Exhibit 1). The agency's "Visit Evaluation Procedures and Guidelines" provide its written policies and procedures with regard to the on-site review of each institution, and include the expected duration (Exhibit 69). Both the criteria and guidelines include how the team size and composition are determined based on the characteristics of the institution to be reviewed. The agency provided documentation in this section and throughout the petition of the implementation of its policies with regard to the on-site review.

The evaluation team reviews and verifies the information included within the institution's self-study, as described in the agency's Accreditation Criteria. The agency provides guidance to site visitors in the "Visit Evaluation Procedures and Guidelines" and evaluator training. The evaluation team drafts a written report that includes the team's determination concerning the institution's compliance with agency standards. The examples provided by the agency verify it conducts at least one comprehensive on-site review of an institution before reaching a decision regarding accreditation.

Department staff notes that the agency's "Self-Study Procedures and Guidelines" states that "A staff member ordinarily will accompany the team on the visit in an effort to achieve consistency in evaluation team reports and because the U.S. Department of Education expects a person on the visit will be present during subsequent consideration by the Council" (Exhibit 61, page 5). However, the Department has no regulation or expectation in this area.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.17(d) Response to Site Review			
Narrative			
<p>The Accreditation Criteria defines the institution's right to respond to the team report (Exhibit 1, Section 2-1-601, p. 20). Following submittal of the report to ACICS by the team chair, the report is reviewed by staff, and the final report is forwarded to the institution approximately 2-3 weeks following the visit along with a cover letter that includes a visit response due date and response submission overview (Exhibit 21, Institutional File-WVBC, pp. 360-361; Exhibit 64, Institutional File-DuBois, pp. 358-359). The document entitled "Preparing the Institutional Response" is also attached, and provides further direction and suggestions as to how the institution should respond to the report and how it should document its response (Exhibit 124, Preparing the Institutional Response).</p> <p>The cover letter for the visit report directs institutions to respond to the full report, not just to the summary of findings, by the established deadline. Prior to the spring of 2017, institutions were given 10 calendar days to respond to the visit report; however, because this did not account for weekends and holidays, the response timeframe has been revised to 10 business days. This more appropriately gives institutions ample time to respond accordingly (Exhibit 125, Institutional File-Penn Commercial, p. 51). Response submission extensions may be granted upon request, at the discretion of staff, and as appropriate (Exhibit 126, Extension Requests and Responses). Further, during the exit interview, the team chair informs the institution of its initial findings, if any, so that the institution can begin working on its response before receiving the final, formal report (Exhibit 127, Exit Interview Script). Every attempt is made to give the institution ample time to develop an adequate response to the findings identified and any other information in the team report, while also providing an opportunity for the Intermediate Review Committee to review all institutional files, including the responses to the visit report, prior to the next meeting of the Council (Exhibit 128, Sample Failure to Respond to Visit Report Correspondence; Exhibit 1, Sections 2-1-602, p. 20; 2-1-700, pp. 20-21; Title II, Chapter 3, Council Actions, Introduction, p. 37). Exhibit 125 provides a full example showing an institution's opportunity to respond, including the cover letter, visit report, and the institution's response (Institutional File-Penn Commercial, pp. 38-99).</p>			
Document(s) for this Section			
Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 124 Preparing the Institutional Response	Exhibit 124 Preparing the Institutional Response.pdf		
Exhibit 125 Institutional File-Penn Commercial	Exhibit 125 Institutional File Penn Commercial.pdf		
Exhibit 126 Extension Requests and Responses	Exhibit 126 Extension Requests and Responses.pdf		
Exhibit 127 Exit Interview Script	Exhibit 127 Exit Interview Script.pdf		
Exhibit 128 Failure to Respond to Visit Report Correspondence	Exhibit 128 Sample Failure to Respond to Visit Report Correspondence.pdf		
Exhibit 21 Institutional File-WVBC	Exhibit 21 Institutional File WVBC.pdf		
Exhibit 64 Institutional File DuBois	Exhibit 64 Institutional File DuBois.pdf		
Analyst Worksheet - Narrative			
Analyst Review Status: Meets the requirement of this section.			
Analyst Remarks to Narrative:			
<p>Section 2-1-601 of the agency's Accreditation Criteria includes the requirement to provide an institution the opportunity to respond to the report of an on-site review (Exhibit 1). The agency's "Preparing the Institutional Response" document includes more specific direction to institutions on how to respond to an on-site evaluation report (Exhibit 124). Specifically, an institution has the opportunity to correct factual errors within the report and has the opportunity to provide a written response to the report.</p> <p>The agency provided documentation that it provides institutions an opportunity to provide a response and that institutions have availed itself of this opportunity, within this section and throughout the petition. And, the documented timeframes for providing the on-site review report and for an institution response are reasonable and in accordance with commonly accepted practices.</p>			
List of Documents Uploaded by Analyst - Narrative			
No Files uploaded			

Criteria: 602.17(e) Agency Analysis of Information

Narrative

The Council's analysis of the self-study and supporting documentation, the visit report, the institution's response, audited financial statements, and any third-party comments received about the institution's compliance with the Council's standards is a tiered process that includes review by an intermediate review committee which makes its recommendations to the Council, which is the primary decision-making body. Prior to the institutional review by the Intermediate Review Committee (IRC) members complete a File Review Worksheet for each institution (Exhibit 129, File Review Worksheet-Empire). This worksheet provides reviewers with pertinent information, including the reason the institution is on the agenda, grant expiration date, any outstanding areas of non-compliance, maximum time frame, a summary of current team findings, and other important information, as applicable. Reviewers also have access to the ACICS online database (i.e. Member Center) where staff upload and maintain additional institutional information, such as retention and placement rates, a link to Campus Accountability Reports, concerns of financial instability, previous areas of non-compliance and Council actions, complaints, and any external information or actions (Exhibit 130, Member Center Screenshot).

The File Review Worksheet is the mechanism used by the IRC member assigned to the specific institution throughout the review process, and is used to record what the institution submitted in their response, why the documentation submitted did or did not sufficiently evidence compliance with agency standards, and the Committee member's recommended accreditation action. This information is then presented to the full Committee and staff for additional discussion and to ensure that the recommendation is appropriate. The Accreditation Criteria describes the first step of the review process as conducted by the IRC (Exhibit 1, Section 2-1-602, p. 20). Guidelines for the IRC are entailed in the Intermediate Review Committee Training Manual (Exhibit 88, IRC Training Binder).

The next step is review of the institutional file by the Council. Each file is assigned to a commissioner who becomes the primary reviewer for that file. The same File Review Worksheets that were used by the Intermediate Review Committee are used by the Council, which allow for consistency and the sharing of key information, while remaining a mechanism for individual deliberations. In addition to reviewing the background information, response notes, and recommendations from the IRC on the File Review Worksheet, the commissioner also has access to and reviews the institutional information in the Member Center, the visit report, and the response documentation submitted by the institution in its response.

Each commissioner uses the File Review Worksheet to record detailed notes as to the adequacy of documentation submitted and whether it satisfactorily demonstrates compliance. The commissioner also specifies whether his/her assessment of the institution's response is the same as the IRC reviewer, and why or why not. Upon signing off on a completed review, the primary reviewing commissioner recommends an accreditation action and all pertinent details that led up to that recommendation, including discussion on the specific documentation provided by the institution. This individual commissioner review is then shared with other commissioners in one of three File Review Committees. The guidelines for file review and for committee review are described in the Commissioner Training Manual (Exhibit 46, Commissioner Training Manual).

The consensus recommendations of each file review committee are then shared with the full Council. The full Council reviews all files in detail. Only the full Council can take a final accreditation action (Exhibit 1, Section 2-1-603, p. 20). Section 2-1-700, on page 20 of the Accreditation Criteria (Exhibit 1), summarizes the procedure by which the Council acts. The various actions available to the Council include granting accreditation (Exhibit 1, Section 2-3-100, p. 37), deferring action (Exhibit 1, Section 2-3-210, pp. 37-38), placing an institution on Compliance Warning (Exhibit 1, Section 2-3-220, p. 38), issuing a show-cause directive (Exhibit 1, Section 2-3-230, p. 38), and denying accreditation (Exhibit 1, Sections 2-3-300, p. 38; 2-3-301, p. 38). The guidelines for Council considerations are detailed in the Commissioner Training Manual (Exhibit 46, pp. 9, 34-36), the Guidelines for Grant Lengths (Exhibit 131), the Commissioner File Review Direction Sheet (Exhibit 132), and Council File Review Reporting Guidelines (Exhibit 133).

ACICS does not accredit an institution until it has shown sufficient evidence that it is compliant with agency standards. If the Council does not have adequate evidence to determine whether an institution seeking a new grant of accreditation is compliant, the Council will defer action, pending receipt of additional information (Exhibit 1, Section 2-3-210, pp. 37-38). An institution seeking a new grant of accreditation may only be deferred once. Institutions not submitting appropriate evidence to support compliance following a deferral will be considered out of compliance and may be issued a compliance warning or other Council action. In each of these circumstances or combination of these circumstances, institutions that demonstrate deficiencies, are provided sufficient time to come into compliance (Exhibit 1, Title II, Chapter 3, Council Actions, Introduction, p. 37).

ACICS subjects all initial applicants and new branch campus applications to a full-team, on-site evaluation, regardless of whether they are currently accredited by another accreditor. Accreditation is not granted unless the campus is fully compliant with all ACICS standards, even if they are in good standing with another agency. Upon receiving an invitation to apply for accreditation with ACICS, a formal request for comment will be sent to the current accreditor to ensure there are no current or pending negative actions (Exhibit 1, Section 2-1-200, p. 17; Exhibit 134, Institution Invitation Letter & Comment from Accreditor). If the Council receives information that an institution has a non-compliant action (e.g. show-cause or probation) from their current accrediting agency, then the Council will ask for a response from the institution regarding that action. The Council would then require the institution to resolve these non-compliant actions with their current accreditor, prior to awarding an initial grant of accreditation (Exhibit 115, South Baylo Initial Application Documentation).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 115 South Baylo Initial Application	Exhibit 115 South Baylo Initial Application.pdf		
Exhibit 129 File Review Worksheet-Empire	Exhibit 129 File Review Worksheet-Empire.pdf		
Exhibit 130 Member Center Screenshot	Exhibit 130 Member Center Screenshot.pdf		
Exhibit 131 Guidelines for Grant Lengths	Exhibit 131 Guidelines for Grant Lengths.pdf		
Exhibit 132 Commissioner File Review Direction Sheet	Exhibit 132 Commissioner File Review Direction Sheet.pdf		
Exhibit 133 Council File Review Reporting Guidelines	Exhibit 133 Council File Review Reporting Guidelines.pdf		
Exhibit 134 Institution Invitation Letter & Comment for Accreditor (UEI/CEM)	Exhibit 134 Institution Invitation Letter and Comment from Accreditor.pdf		
Exhibit 46 Commissioner and Board of Director Training Manual	Exhibit 46 Commissioner and Board of Director Training Manual.pdf		

Exhibit 88 IRC Training Binder	Exhibit 88 IRC Training Binder.pdf		
Analyst Worksheet - Narrative			
Analyst Review Status: Meets the requirement of this section.			
Analyst Remarks to Narrative: Sections 2-1-603 and 2-1-700 of the agency's Accreditation Criteria requires that all documentation provided during the accreditation review process is provided to the council for review to make an accreditation decision on an institution (Exhibit 1). In addition, Section 2-1-602 of the agency's Accreditation Criteria states the role of the Intermediate Review Committee (IRC) and its review of all information and documentation regarding the institution in the accreditation review process, to include providing a recommendation to the council. The agency provided documentation to demonstrate that these reviews of materials by both bodies are comprehensive.			
List of Documents Uploaded by Analyst - Narrative			
No Files uploaded			

Criteria: 602.17(f) Report on Compliance & Student Achievement

Narrative

Integral to the Council's effective evaluation of institutional quality and integrity is the review of evidence and data during on-site visits through observations, interviews and reviews of documentation. ACICS places great emphasis on the completeness and rigor of the written reports generated by the on-site visit teams. The Council expects the report to cover "each area reviewed...and other information pertinent to an accurate evaluation." The substance of that report must include any findings of material non-compliance with standards. It may also include "recommendations for institutional improvement" (Exhibit 1, Section 2-1-503, p. 20). The team report is shared with the institution's "chief on-site administrator" who is invited to respond to any findings in writing (Ibid., Section 2-1-601, p. 20).

ACICS utilizes a team report format whose structure parallels the structure of the Accreditation Criteria, and the structure of the self-study report. The team report details the evaluation team's assessment of the institution's compliance with the following items: institution's planning processes and performance relative to its published mission and purpose; administration and organization, relations with students, educational activities and general education standards, educational facilities, publications, library, and standards for each program and credential level, as well as all other issues detailed in the team report (Exhibit 62, Team Report Template). The on-site evaluation team uses the information in the self-study as a point of reference in completing the team report and assessing the program's and institution's compliance with standards. Every item of inquiry is cross-referenced in the team report to the corresponding section of the ACICS standards.

A completed team report as defined by ACICS answers in writing all applicable questions, summarizes the findings in terms of specific criteria, and identifies which findings require an institutional response. ACICS staff is responsible for collecting, finalizing, and delivering all team reports in a timely manner to the institution. Upon electronic delivery to the institution, the team report includes a cover letter which describes the process for the institution to provide its response to the team's findings as well as the required date to submit its response for review by the Council. The team report, the institutional response, and institutional self-study are then reviewed by Council and a decision is made on each application (Exhibit 125, Institutional File-Penn Commercial).

As an element of its review of institutional effectiveness, ACICS evaluates indicators of student achievement through the comprehensive on-site visit as well as through accountability reports submitted by each campus, for each program, every year. At minimum, ACICS requires every program and institution to plan for, operate and collect data regarding retention performance and placement performance. In the category of "student learning outcomes," the Council also requires that data regarding program level licensure/certification pass rates be collected, reported, and evaluated each year for programs where licensure is required to gain employment (Exhibit 1, Section 3-1-111, p. 46). These are the primary elements of student achievement established by the Council (Ibid., Section 3-1-111, p. 46).

In addition to the review of student achievement as part of the on-site visit and team report, the Council evaluates student achievement data, including retention, placement, and licensure examination pass rates, if applicable, on an annual basis through the required Campus Accountability Report (CAR) (Ibid., Section 2-1-809, p. 22). Upon submission of the CAR, the institution has access to a report that details its retention and placement rates at the campus-level and retention, placement, and licensure examination pass rates (if applicable) for each program (Exhibit 18, Institutional File-Branford Hall, pp. 1-2, 5). The Council expects institutions to be in compliance with published student achievement measures and when Council determines student achievement outcomes are below standard, it will enforce a number of actions consistent with the guidelines established in Appendix L – Student Achievement Standards and Campus Accountability Reports (Exhibit 1, Appendix L, p. 135).

The Council's review of CAR data is a formal, structured annual activity that determines, based on current benchmarks, whether the campus or program is performing according to ACICS standards. Based on the review, ACICS notifies the institution of the actions it must take to remedy the deficiencies (Exhibit 136, Sample Student Achievement Action Letters). When a campus or program does not come into compliance within the Council's time frame, or does not demonstrate its ability to come into compliance, the campus or program is provided a letter of withdrawal that details the area of noncompliance (Exhibit 18, Institutional File-Branford Hall, pp. 245-246; Exhibit 20, Sample SA Withdrawal Letters).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 125 Institutional File-Penn Commercial	Exhibit 125 Institutional File Penn Commercial.pdf		
Exhibit 136 SA Actions	Exhibit 136 SA Actions.pdf		
Exhibit 18 Institutional File-Branford Hall Branford	Exhibit 18 Institutional File Branford Hall - Branford.pdf		
Exhibit 20 Sample Student Achievement Withdrawal Letters	Exhibit 20 Sample Student Achievement Withdrawal Letters.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide documentation that it has a policy to provide an assessment of the areas required by this section.

Analyst Remarks to Narrative:

The agency states that it utilizes the on-site visit team report to clearly communicate the assessment of an institution's compliance with the agency's standards, to include performance with respect to student achievement. The requirement to provide such a report is included in Section 2-1-503 of the agency's Accreditation Criteria (Exhibit 1). However, the criteria is not specific to state that the written report includes the assessment of the institution's compliance with standards, to include areas needing improvement, and the institution's performance with respect to student achievement, as required by this section. Without a written policy that specifically includes these requirements, it is not clear that the agency ensures the consistent inclusion of such assessments.

The examples provided in this section document the use of the on-site team report to communicate areas of compliance and non-compliance, as well as the institution's performance with respect to student achievement (Exhibits 18, 125, & 136).

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.17(g) Student Verification			
Narrative			
<p>ACICS standards require any institution offering programs via distance education to verify the identity of its students. The Accreditation Criteria states, "Institutions must demonstrate that the student who registers for a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit. The verification method, at the option of the institution, may include a secure login and pass code, proctored examinations, and other appropriate student authentication or verification technology" (Exhibit 1, Appendix H, Section II, Curriculum and Instructional Delivery (e), p. 125). In addition, ACICS requires that the institution protect student privacy. The Accreditation Criteria states, "Institutions must make it clear in writing at the time of enrollment how the student's identity will be verified throughout the course and program, how the student's privacy will be protected, and if the student will be assessed any additional charges associated with verification of student identity" (Exhibit 1, Appendix H, Section II, Admissions Requirements and Enrollment (b) p. 125).</p> <p>The addition of a new delivery method, such as distance education is determined to be a substantive change at the institution (Exhibit 1, Section 2-2-101(d), p. 23 and Section 2-2-106, p. 25). Therefore, institutional compliance with Accreditation Criteria, as it pertains to this substantive change is assessed, initially through the submission of a Distance Education application and supplemental documents. An institution must evidence compliance with the Principles and Requirements for Nontraditional Education in the development of its distance education coursework (Exhibit 1, Appendix H, Section II, pp. 124-126). The Distance Education Application outlines questions regarding how an institution verifies and protects the identity of its students participating in courses via distance education (Exhibit 141, Substantive Change Application Templates, pp. 24-32).</p> <p>The Council through its Executive Committee reviews the Distance Education Application and determines what action to take on the application. If the application is approved, the institution receives an approval letter and is granted permission to begin enrolling students and offering courses via distance education. A follow-up on-site Quality Assurance Monitoring – Nontraditional Education Evaluation Visit is conducted a year after the start of the distance education activity. There are questions specific to the requirement for verifying and protecting the student's identity in the report (Exhibit 112, Distance Ed Application).</p> <p>Further, the Renewal of Accreditation Visit report outlines the institution's compliance with the distance education requirements during each subsequent review of the institution. Questions A.11-A.13 and A.20 on the report are utilized by the evaluator to assess the institution's compliance with requirements for verifying and protecting the student's identity (Exhibit 62, Team Report Template, Section 9). As outlined in the Evaluator Procedures and Guidelines document in §602.15(a)(2), p.25, during Quality Assurance Monitoring Nontraditional Education Evaluation and Renewal of Accreditation Visits, the distance education specialist reviews the institutional catalog to ensure that any additional charges related to student verification and privacy have been denoted. (Exhibit 69, Visit Procedures and Guidelines, pp. 24-25).</p>			
Document(s) for this Section			
Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 112 Distance Ed Application (Valley College)	Exhibit 112 Distance Ed Application (Valley College).pdf		
Exhibit 141 Substantive Change Application Templates	Exhibit 141 Substantive Change Application Templates.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		
Analyst Worksheet - Narrative			
Analyst Review Status: Does not meet the requirement of this section.			
Staff Determination			
The agency must provide documentation to demonstrate that the agency requires institutions that offer programs via distance education to have student verification methods in place and processes to protect student privacy.			
Analyst Remarks to Narrative:			
<p>The agency's written policies with regards to its expectations of student verification for programs offered via distance education are included in Section II of Appendix H of the agency's Accreditation Criteria (Exhibit 1). The policy states "Institutions must demonstrate that the student who registers for a distance education course or program is the same student who participates in and completes the course or program and receives the academic credit. The verification method, at the option of the institution, may include a secure login and pass code, proctored examinations, and other appropriate student authentication or verification technology." Appendix H of the agency's Accreditation Criteria also require that students are notified of how their privacy will be protected and of any additional charges associated with the verification of identity at the time of enrollment.</p> <p>The agency stated that the executive committee reviews any requests to add distance education via the substantive change process and provided documentation of such an application and review. Subsequent to the initial approval, the agency stated that the evaluation team reviews the adequacy of the methodology during an evaluation. The agency provided the evaluation team templates and guidelines used for such reviews (Exhibits 62 and 69), however, the agency did not provide any documentation to demonstrate implementation of such review.</p>			
List of Documents Uploaded by Analyst - Narrative			
No Files uploaded			

Criteria: 602.18(a) Standards Respect Mission, Ensure Quality & Are Clearly Written

Narrative

ACICS awards accreditation solely based upon its published policies, procedures and standards. The requirements for all institutions and programs are expressed in the Accreditation Criteria. This comprehensive document (Exhibit 1) forms the structure for the consistent application of Council expectations. While the accreditation standards serve as minimum expectations, and innovation is encouraged at institutions, the standards apply to all institutions and programs, as well as specific credential levels (Exhibit 1, Title III, Evaluation Standards, Chapter 1, General Standards Applicable to All Institutions, Introduction, p. 45).

The Accreditation Criteria (Exhibit 1, Section 3-1-100, p. 45) requires institutions to have "a mission statement and set of objectives which together accomplish the purpose of the institution" and "should be devoted substantially to career-related education." This standard is applicable to all institutions, without regard to the chosen methodology, or mode of educational delivery. The Council's standards are respectful of the mission of the institution while they are also consistently applied and enforced to ensure that the education and training offered by ACICS-accredited institutions are of sufficient quality to achieve the stated objective. As long as the mission meets Council standards, institutions are afforded the opportunity to express variety in purpose and practice.

An institution's mission is paramount for the accreditation review. The mission is reviewed when an institution first seeks accreditation through ACICS and continues through the comprehensive on-site evaluation (Exhibit 62, Team Report Templates Section 1-3, Mission, Organization, and Administration). Throughout this review, ACICS checks to make sure that the institution has an established mission, with a set of objectives, that is publicly disclosed (Exhibit 1, Section 3-1-101, p. 45). Further, it assesses the institution's conscientious commitment to the successful implementation of the mission, and that the institution's faculty, financial resources, physical plant, administration, management, and educational activities are appropriate (Exhibit 1, Section 3-1-102, p. 45). The evaluation of each institution on the basis of its stated mission is further prescribed by the Council through its standards for Campus Effectiveness Plans (CEP) (Exhibit 1, Sections 3-1-110, pp. 45-46; Appendix K, pp. 132-133). Through the CEP, an institution will assess the degree to which it is meeting its stated mission and objectives by reviewing all critical organizational and operational functions, including admissions, recruitment, financial aid, student services, and student achievement outcomes.

To ensure consistent application of the Accreditation Criteria throughout the accreditation process, ACICS uses a variety of structural mechanisms, including, most importantly, training provided to all parties involved in the process: accreditation staff, on-site evaluators, Intermediate Review Committee members, Council commissioners, and Review Board members (Exhibit 69, Visit Evaluation Procedures and Guidelines; Exhibit 71, Evaluator Training Binder; Exhibit 72, Evaluator Refresher Training; Exhibit 88, IRC Training Binder; Exhibit 46, Commissioner Training Manual; Exhibit 66, Review Board Training Manual). A central aspect of the training for accreditation staff and on-site evaluators is instruction on providing detailed responses to any findings in the evaluation report, and cross-referencing the applicable standard(s) (Exhibit 62, Team Report Templates).

In addition to the Accreditation Criteria being readily available to currently accredited and prospective institutions through the agency's website, <http://www.acics.org/publications>, the Council's written standards are provided to all institutions seeking initial or renewal grants of accreditation during their participation in mandatory accreditation workshop. The content of the standards, and considerations for how they are applied by an on-site review team and the Council, are given substantial profile during the workshop (Exhibit 118 a & b, Accreditation Workshops).

Prior to making any substantive revisions to the Accreditation Criteria, the Council discloses any proposed changes and an explanation of those changes to all stakeholders through an interactive "Memorandum to the Field" and "AWARE (ACICS Webinar Announcing Relating, and Explaining) Memos" (Exhibit 23, Systematic Review of Criteria). These Webinars are also placed on the ACICS website for those who are not able to listen live: <http://www.acics.org/events>. The solicited reactions and comments are considered before the Council adopts the final version (Exhibit 45, Council Meeting Minutes).

Document(s) for this Section

Document Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 118 a- Initial Accreditation Workshop	Initial Accreditation Workshop Spring 2016.pptx		
Exhibit 118 b- Renewal Accreditation Workshop	Renewal Accreditation Workshop Fall 2016.pptx		
Exhibit 23 Systematic Review of Criteria	Exhibit 23 Systematic Review of Criteria.pdf		
Exhibit 45 Council Meeting Minutes-December 2016 and April 2017	Exhibit 45 Council Meeting Minutes-December 2016 and April 2017.pdf		
Exhibit 46 Commissioner and Board of Director Training Manual	Exhibit 46 Commissioner and Board of Director Training Manual.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		
Exhibit 66 Review Board Training Manual	Exhibit 66 Review Board Training Manual.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		
Exhibit 71 Evaluator Training Binder	Exhibit 71 Evaluator Training Binder.pdf		
Exhibit 72 Evaluator Refresher Training	Exhibit 72 Evaluator Refresher Training.pdf		
Exhibit 88 IRC Training Binder	Exhibit 88 IRC Training Binder.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Meets the requirement of this section.

Analyst Remarks to Narrative:

The agency's standards, policies and procedures are written and published in its Accreditation Criteria (Exhibit 1) and are available to the public and its membership on its website, as confirmed by Department staff. The standards have been reviewed and found to be sufficiently clear and specific to describe the agency's expectations. The agency's review process demonstrates that it takes into account an institution's mission when determining educational quality of the programs offered, no matter the mode of delivery.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded

Criteria: 602.18(b) Consistent Application of Standards

Narrative

ACICS bases all accreditation decisions upon the standards outlined in the Criteria (Exhibit 1). The consistent application of the Criteria to institutional operations is the fundamental principle guiding the Council's assessment of educational quality and institutional integrity. The agency's consistency of enforcement ensures that the education and training offered by accredited institutions are of sufficient quality to achieve the stated objective(s) for the duration of the accreditation period granted.

ACICS employs numerous effective controls to protect against the inconsistent application of its standards, including (1) training for staff, evaluators, team chairs, Intermediate Review Committee members, commissioners, review board, and institutions; (2) the implementation of due process for institutions when responding to areas non-compliance; (3) multiple levels of individual and group evaluation; and through (4) systematic staff procedures, including coordination of on-site evaluations, execution of Council actions, and the identification and resolution of areas of ambiguity.

Ongoing training is a mainstay for everyone involved in the accreditation process to ensure consistency in the interpretation and application of the Criteria. The training of staff is conducted as part of the onboarding process, through several weeks of visit shadowing, and in ongoing pre-and post-visit cycle preparation and review (Exhibit 69, Visit Evaluation Procedures and Guidelines; Exhibit 142, New Coordinator Training; Exhibit 143, Accreditation Coordinator Training). Evaluator Training is provided through the Visit Evaluation Procedures and Guidelines (Exhibit 69), periodic webinars (Exhibit 72, Evaluator Refresher Training), and various written materials available on the ACICS Web site: <http://www.acics.org/evaluators>. Evaluators selected for visits receive additional direction at the pre-visit meeting held prior to each on-site visit (Exhibit 74, Pre-Visit Meeting Outlines), and obtain a current copy of the Accreditation Criteria from the ACICS Web site for their review.

Individuals who are selected to serve as Chairs of site review teams have served extensively as evaluators and are given additional training (Exhibit 76, Chair Training Binder). Experienced evaluators who are selected to serve on the Intermediate Review Committee (IRC) are further trained on the IRC process after each selection to ensure consistency in the application of the Accreditation Criteria during their review (Exhibit 88, IRC Training Binder). New commissioners-elect are required to observe an IRC session, to attend a separate training session, and to observe a Board and Council meeting prior to joining the Council. Current Council members receive ongoing training before each Council meeting (Exhibit 65, Commissioner Orientation; Exhibit 46, Commissioner Training Manual; Exhibit 132, Commissioner File Review Direction Sheet; Exhibit 133, Council File Review Reporting Guidelines; Exhibit 131, Guidelines Grant Length). Members of the Review Board have gone through all of the previously mentioned layers of training, and are also trained through use of a "Review Board Training Manual" (Exhibit 66).

As outlined in section §602.17(b), schools seeking initial or new grants of accreditation receive training through a mandatory Accreditation Workshop that is offered multiple times a year (Exhibit 118 a & b, Accreditation Workshops). ACICS also provides training and webinars whenever new standards are proposed and finalized through the Memo to the Field and ACICS AWARE Webinars (Exhibit 23, Systematic Review of Criteria).

Each site visit team develops a written report describing the results of the team's evaluation, including a list of the specific sections of the Criteria with which the institution is not in compliance. After going through a series of edits to safeguard against inaccuracies and inconsistency the report is then provided to the institution, which is invited to submit a written response. The team report is structured as a comprehensive narrative checklist, wherein all questions are linked in the template to various sections of the Criteria, to ensure consistency in their application (Exhibit 62, Team Report Template). Exhibit 144, (Empire Team Report) demonstrates how the findings in each report with respect to specific sections of the Accreditation Criteria are summarized at the end of each report, to serve as the basis for the File Review Worksheet (Exhibit 129, Sample File Review Worksheet), thereby ensuring consistency across all levels of review.

As noted previously, the on-site visit report receives several levels of review before it is sent to the institution for response. It is reviewed by the team chair, accreditation visit coordinator, a second accreditation staff member, and finally by the ACICS Accreditation Content Editor. The report and subsequent response from the institution are also reviewed at multiple levels, again providing additional controls for consistency. As detailed in Section §602.17(e) in this petition, first the IRC reviews each team report and the corresponding response from the institution and makes a recommendation to the Council. The IRC reviewer makes notes on a File Review Worksheet regarding each issue of concern and the determination as to whether the issue has been resolved satisfactorily by the response (Exhibit 129, Sample File Review Worksheet). This information is discussed with the full committee, and a consensus is reached regarding the recommendation to the Council. The primary IRC reviewer is listed on the File Review Worksheet.

The institution's complete file, including previous Council actions and areas on non-compliance, current student achievement outcomes, complaints and external information, financial status, team report, institutional response, and IRC recommendations, is then reviewed by a principal commissioner reviewer. The commissioner also makes notes on the File Review Worksheet, detailing the sufficiency of the institutional response to evidence compliance in areas in question. The individual recommendations of that commissioner and corresponding institutional background are then discussed and considered by a working committee of the Council, which makes a recommendation to the full Council for final action. Following the considerations of the file review committee, the primary reviewer of each institutional file presents the recommendations of the committee to the full Council. The File Review Worksheet (Exhibit 129) documents all levels of review, including all the citations recommended by the site evaluation team, the results of the IRC review and, finally, the review of the file by Council members and final action by the full Council. The File Review Worksheet serves as the working document and this information is eventually formalized into the Council Action letter (Exhibit 16: Sample Council Action Letters). While the Council uses written guidelines to make decisions about grant lengths for approvals (Exhibit 1, Section 2-3-100, p. 37; Exhibit 131, Guidelines for Grant Lengths) or other Council actions (Exhibit 1, Sections 2-3-220, p. 38; 2-3-230, p. 38; 2-3-301, p. 38), the Council also uses discretion, as appropriate, when making decisions. All information regarding the institution is considered prior to taking an action (Exhibit 1, Title II, Chapter 3, Introduction, p. 37).

Document(s) for this Section

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Exhibit 1 Accreditation Criteria	Exhibit 1 Accreditation Criteria.pdf		
Exhibit 118 a- Initial Accreditation Workshop	Initial Accreditation Workshop Spring 2016.pptx		
Exhibit 118 b- Renewal Accreditation Workshop	Renewal Accreditation Workshop Fall 2016.pptx		
Exhibit 129 File Review Worksheet-Empire	Exhibit 129 File Review Worksheet-Empire.pdf		
Exhibit 131 Guidelines for Grant Lengths	Exhibit 131 Guidelines for Grant Lengths.pdf		
Exhibit 132 Commissioner File Review Direction Sheet	Exhibit 132 Commissioner File Review Direction Sheet.pdf		

Exhibit 133 Council File Review Reporting Guidelines	Exhibit 133 Council File Review Reporting Guidelines.pdf		
Exhibit 142 New Coordinator Training	Exhibit 142 New Coordinator Training.pdf		
Exhibit 143 Accreditation Coordinator Training--August 2016	Exhibit 143 Accreditation Coordinator Training.pdf		
Exhibit 144 Empire Team Report	Exhibit 144 Empire Team Report.pdf		
Exhibit 16 Sample Council Action Letters	Exhibit 16 Sample Council Action Letters.pdf		
Exhibit 23 Systematic Review of Criteria	Exhibit 23 Systematic Review of Criteria.pdf		
Exhibit 46 Commissioner and Board of Director Training Manual	Exhibit 46 Commissioner and Board of Director Training Manual.pdf		
Exhibit 62 Team Report Templates	Exhibit 62 Team Report Templates.pdf		
Exhibit 65 Commissioner Orientation	Exhibit 65 Commissioner Orientation.pdf		
Exhibit 66 Review Board Training Manual	Exhibit 66 Review Board Training Manual.pdf		
Exhibit 69 Visit Evaluation Procedures and Guidelines	Exhibit 69 Visit Evaluation Procedures and Guidelines.pdf		
Exhibit 72 Evaluator Refresher Training	Exhibit 72 Evaluator Refresher Training.pdf		
Exhibit 74 Sample Pre-Visit Meeting Outlines	Exhibit 74 Sample Pre-Visit Meeting Outlines.pdf		
Exhibit 76 Chair Training Binder	Exhibit 76 Chair Training Binder.pdf		
Exhibit 88 IRC Training Binder	Exhibit 88 IRC Training Binder.pdf		

Analyst Worksheet - Narrative

Analyst Review Status: Does not meet the requirement of this section.

Staff Determination

The agency must provide information and documentation concerning the waiver of standards.

Analyst Remarks to Narrative:

The agency provided information and documentation of the agency's policies, procedures and guidance to ensure the consistent application of standards. The agency has demonstrated (via examples in this section and throughout the petition) that it has and applies effective controls against the inconsistent application of its standards, to include: written standards, policies, and procedures; guidance provided via written materials and at workshops; standardized on-site review documents; training of evaluators and decision-makers; and review by evaluators, and council and Intermediate Review Committee members.

Department staff notes the introduction of Title III, Chapter 1 of the agency's Accreditation Criteria states "The Council recognizes that some requirements of these standards may not be appropriate for entities, and it may waive specific standards on a case-by-case basis" (Exhibit 1, page 45). The agency did not provide any information or documentation concerning the waiver of standards.

List of Documents Uploaded by Analyst - Narrative

No Files uploaded