

FINAL ANALYSIS AND RECOMMENDATION FOR ODCTE

Meeting Date: 02/27/2024

Type of Submission:
Renewal Petition

Criteria: 603.24(a)(1)(i)

Description of Criteria

(i) Is statewide in the scope of its operations and is legally authorized to approve public postsecondary vocational institutions or programs;

Narrative:

The Oklahoma State Board of Career and Technology Education has established the accreditation standards and is recognized as the authority for approval of postsecondary vocational education offered at CareerTech institutions in the state of Oklahoma.

The Oklahoma Department of Career and Technology Education (ODCTE) has rules approved by the state legislature outlining legal authority.

See attachment 1: Oklahoma CareerTech Rules for Career and Technology Education, section 780:10-7-3, page 18.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 1 Attachment 1 CareerTech Rules	ATTACHMENT 1 CareerTech Rules.pdf	-	-
State Statute Email	State Statute Emails.pdf	-	-
Oklahoma Statutes Title 75	Oklahoma Statutes Title 75.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide the State statutory documentation to demonstrate the agency has legal authority to approve public postsecondary vocational institutions.

Analyst Remarks to Narrative:

Scope of Operations: The agency provided Title 780 of Oklahoma Administrative Code (State rules), which outlines the governance structure of the Oklahoma Department of Career and Technology Education and establishes procedures for general operations (Attachment 1). The State rules thoroughly address the agency's scope of operations (e.g., administration and supervision, funding, office location, travel, records, etc.). Legally Authorized: The Oklahoma State legislature established the State Board of Career and Technology Education's authority to operate. However, the agency did not provide the State statutory documents to demonstrate the agency has legal authority to approve public postsecondary vocational institutions.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Below is the narrative provided by (b)(6) I have also attached his email correspondence.

Title 75 Oklahoma Statutes, Section 308.2 states in part:

"C. Rules shall be valid and binding on persons they affect, and shall have the force of law unless amended or revised or unless a court of competent jurisdiction determines otherwise. Except as otherwise provided by law, rules shall be prima facie evidence of the proper interpretation of the matter to which they refer."

Thus, the ODCTE rules have the force of law and are a proper interpretation of Oklahoma law, as it relates to accreditation of technology center school districts. See pg 25 780-3-1 (a) to see the rule that allows us to serve post-secondary students.

The state statute has been uploaded, Oklahoma Statutes, Title 75. Please see pages 55-56 for Section 308.2.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the agency must provide the State statutory documentation to demonstrate the agency has legal authority to approve public postsecondary vocational institutions. In response, the agency provided the rules under Title 780 that give the Oklahoma Department of Career and Technology Education the legal authority to establish technology center districts through criteria and procedures of the State board (Exhibit 1, page 25). The agency also provided the Oklahoma Statutes, Title 75, Section 308.2 to demonstrate that the agency's rules are supported by the statute and it relates to accreditation of technology center school (Exhibit 66, page 55-56). The agency's response was satisfactory and no additional information is needed.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(1)(ii)

Description of Criteria

(ii) Clearly sets forth the scope of its objectives and activities, both as to kinds and levels of public postsecondary vocational institutions or programs covered, and the kinds of operations performed;

Narrative:

ODCTE has clearly defined its scope of objectives and activities in the Accreditation Guidelines Procedures section. The objectives and activities have been developed and approved by the Oklahoma State Board of Career and Technology Education.

See attachment 2: Accreditation Guidelines, page 6, Procedures, sections A and B.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
ODCTE State Board Minutes	October 2015 ODCTE State Board Signed Minutes	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency stated the objectives and activities included in the guidelines were developed and approved by the Oklahoma State Board of Career and Technology Education (State board). However, no evidence of the approval was provided. The agency must provide evidence the accreditation guidelines were approved by the State board.

Analyst Remarks to Narrative:

The agency's accreditation guidelines indicate the agency's goal of accreditation is to ensure that education is provided by postsecondary institutions that meet acceptable levels of quality, and the accreditation guidelines provide a list of key reasons why accreditation is important to Oklahoma's CareerTech System (Attachment 2, page 5). The agency indicates in the narrative that the objectives and activities included in the guidelines were developed and approved by the Oklahoma State Board of Career and Technology Education (State board). However, the agency did not provide evidence the accreditation guidelines were approved by the State board. The accreditation guidelines also provide a definition of vocational training institutions that are eligible for accreditation, as well as a rationale for institutional accreditation (Attachment 2, page 6). The agency's guidelines adequately address the agency's scope of objectives and activities.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

The Board minutes from the October 2015 meeting have been uploaded. During this

meeting, the Board approved the Guidelines. See pages 5 and 6.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must provide evidence that the accreditation guidelines were approved by the State board. In response, the agency provided the State board minutes from the October 2015 meeting, which demonstrated a vote of approval occurred on the postsecondary standards (Exhibit 15, pages 5-6). The agency's response was satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(1)(iii)

Description of Criteria

(iii) Delineates the process by which it differentiates among and approves programs of varying levels.

Narrative:

ODCTE has outlined processes in the State Board established and approved Accreditation Guidelines.

See attachment 2: Accreditation Guidelines, pages 4-5 (Accrediting Agency Accreditation Procedure) and 8-11 (Evaluation and Review Procedures).

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Red River Accreditation Approval Letter	Red River Accreditation Approval Letter.pdf	-	-
Red River Admin Interviews	Red River Admin Interview Forms.pdf	-	-
Red River BIS Client Interviews	Red River BIS Client Interview Form.pdf	-	-
Red River Instructor Interviews	Red River Instructor Interview Forms.pdf	-	-
Red River Program Observations	Red River Program Observation Forms.pdf	-	-
Red River Student Interviews	Red River Student Interview Forms.pdf	-	-
Red River Stakeholder Interviews	Red River Stakeholder Interview Forms.pdf	-	-
Red River Support and Student Services Interviews	Red River Support and Student Services Interv	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter and site visitor interview forms for RRTC.

Analyst Remarks to Narrative:

The agency is legally authorized to approve public postsecondary vocational education programs at careertech insitutions that do not offer college credits and do not fall under the jurisdiction of the State Regents of Higher Education. The agency defines the type of vocational training institutions that are eligible for accreditation in its accreditation guidelines (Exhibit 2, page 6). Although programs may vary in length and degree of difficulty, all are nondegree granting programs and all institutions

undergo the same approval and accreditation process, which is clearly outline in the accreditation guidelines (pages 4-5 and 8-11). The agency's accreditation process consists of established standards, an in-depth self-evaluation study, an onsite team evaluation and report, clearly defined accreditation status/categories, and accreditation decisions by the State board. The State board establishes procedures and standards of accreditation for career and technology institutions offering postsecondary educational programs. To demonstrate the application of its procedures, the agency provided the Red River Technology Center (RRTC) assessment application (Attachment 27) and self-assessment (Attachment 11), an agenda for the site visit (Attachment 21), examiner statements relative to the site visit interviews (Attachment 15), a blank site visitor interview form containing guided questions (Attachment 16), and a site visit assessment form/report (Attachment 12). However, the agency did not provide an accreditation decision letter and an actual site visitor forms for RRTC.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Additional document uploaded includes RRTC's approval letter and PDF's of completed interview forms from both group and individual interviews during RRTC's accreditation visit.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that agency must provide an accreditation decision letter and actual site visitor forms for RRTC. In response, the agency provided a decision letter that approved continued full postsecondary accreditation (certificate of accreditation) to RRTC on January 21, 2021 (Exhibit 1). In addition, the agency provided complete interview forms for the administration, business and industry services/adult career development, instructors, program observations, students, stakeholders, and student support services. The forms contained questions specific to the interviewee and their responses (Exhibits 2-8).

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(2)(i)

Description of Criteria

(i) Employs qualified personnel and uses sound procedures to carry out its operations in a timely and effective manner;

Narrative:

The Accreditation Division at ODCTE, includes a Deputy State Director, Accreditation Manager, Accreditation Coordinator, Civil Rights Coordinator, Financial Aid Specialist, and Project Assistant.

See attachment 3 for current job descriptions.

See attachment 4 for the Red River Technology Center Timeline as evidence of carrying out our operations in a timely and effective manner.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 3 Attachment 3 Accreditation Job Descriptions	ATTACHMENT 3 Accreditation Job Descriptions.p	-	-
Exhibit 4 Attachment 4 Red River Timeline	ATTACHMENT 4 Red River Timeline.pdf	-	-
State Director Resume	BrentHaken Resume Supt.pdf	-	-
Deputy State Director Resume	Justin Lockwood Resume2023 (AutoRecovered)(1)	-	-
New Hire Check list	New Accreditation Employee Checklist.docx	-	-
Accreditation Manager Resume	Resume 2023.pdf	-	-
Accreditation Coordinator Resume	Hanna Brown- Resume 2023(1).docx	-	-
Financial Aid Specialist Resume	Sandra McKnight_resume current_.pdf	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Civil Rights Coordinator Resume	Alan Nahs - Up to Date Resume.docx	-	-
Accreditation Administrative Assistant Resume	Katha Resume 2023.pdf	-	-
Accreditation Guidelines	2023-24 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide resumes to demonstrate current personnel are qualified, and the agency must include timelines in its operational procedures to ensure operations are conducted in a timely and effective manner.

Analyst Remarks to Narrative:

The State Board is required to provide sufficient staff for the agency to perform the functions and responsibilities for career and technology education under state and federal laws, as outlined in the rules approved by the State legislature (Exhibit Attachment 1). The rules in Attachment 1 also specify that the State director of the agency must determine the duties of employees and recommend the appointment and compensation of such employees in accordance with state laws. The agency's administrative personnel consist of the State director, deputy state director, accreditation manager, accreditation coordinator, civil rights coordinator, financial aid specialist, and project assistant administer the accreditation program, and the agency provided job descriptions for all of these positions (Attachment 3). However, the agency did not provide any resumes for its personnel to demonstrate current personnel are qualified, in both education and experience, to administer the agency's operations. The agency also did not provide a policy that requires its personnel to undergo training or documentation to demonstrate personnel participated in training. Though the agency provided a flowchart to demonstrate when accreditation activities were carried out in a timely and effective manner for the review of Red River Technology Center (RRTC) in Attachment 4, the agency did not provide any written operational

procedures that establish timelines in which accreditation activities are supposed to take place. For instance, the RRTC sample indicates the feedback report was supposed to be sent to the agency 30-60 days after the last site visit; however, the agency does not have a policy that requires the feedback report to be sent to the institution in 30-60 days. The agency also does not have a policy that specifies when site visits are to occur after the submission of a self-analysis or that indicate when a site team report must be issued to the institution after a site visit has been conducted.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Resumes for the State Director, Deputy State Director, Accreditation Manager, Accreditation Coordinator, Financial Aid Specialist, Civil Rights Coordinator, and Administrative Assistant have been uploaded. The accreditation staff training check list has been uploaded. The period of accreditation (timelines) is explained in our Guidelines, pages 6-14. These procedures ensure our operations are conducted in a timely and effective manner. While it is a goal of our agency to complete Feedback Reports in 30-60 days, it is not written in State Board approved policy or procedure. This timeline can change depending upon the number of site visits that year. As stated in our Guidelines (page 8), applications from the institutions are due July 15. At this time, we conduct visits in the fall and winter because it is most convenient for our agency and institutions. The timeline for training examiners is outlined in our approved Guidelines, pages 11-12.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must provide resumes to demonstrate current personnel are qualified, and the agency must include timelines in its operational procedures to ensure operations are conducted in a timely and effective manner. In response, the agency provided resumes for the state director, deputy state director, accreditation manager, accreditation coordinator, financial aid specialist, civil rights coordinator, and administrative assistant (Exhibits 48, 49, 51-55), which demonstrates staff qualifications are consistent with position descriptions. For instance, the position description requires the State director to have experience in leadership and have superintendent certification or/and ability to obtain

superintendent certificate within 24 months (Exhibit 3). The current State director has a Master's degree in educational leadership and is currently a superintendent of a public school. Qualifications for all aforementioned personnel was determined to be congruent with position descriptions.

The agency clarified in the narrative that its goal is to complete feedback reports in 30-60 days, but it may vary depending on the number of site visits that must be conducted with a year. The agency also indicated its guidelines contain timelines (Exhibit 56, pages 6-14). The guidelines have an established due date for the self-assessment applications, as July 15 each year (Exhibit 56, page 8), and the completed self-assessment tool and the compliance checklist must be submitted at the same time as the application (Exhibit 56, page 9). The standard action plan template relative to the continuous improvement must be submitted to the state accreditation division within three months of State board approval. A corrective action plan may be required if an examiner identifies areas of deficiency, and the plan must be implemented within sixty days of board approval (Exhibit 56, page 10). The guidelines also outlines the examiner application are due May 1st of each year and selections are made July 1st (Exhibit 56, pages 11-12).

The agency's response is satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(2)(ii)

Description of Criteria

(ii) Receives adequate and timely financial support, as shown by its appropriations, to carry out its operations;

Narrative:

The Accreditation Division is fully staffed with a dedicated team of five. The division is appropriated an adequate travel budget for technology center accreditation visits.

See attachment 5 for the Accreditation Division FY22 budget.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 5 Attachment 5 FY22 Accreditation Budget	ATTACHMENT 5 FY-22 Accreditation Budget.pdf	-	-
State Appropriations Legislation	State Appropriations.pdf	-	-
Accreditation Budget vs Actual	BudgetVSActual.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The State agency must provide evidentiary documentation regarding its 2022 funding through State appropriations to demonstrate it receives adequate and timely financial support and a budgetary outline of actual expenditures that occurred in 2022.

Analyst Remarks to Narrative:

The agency provided a budget for fiscal year 2022, which outlines expenditures for travel, salaries, contracts, equipment, etc., and the agency indicated in the narrative that the division is appropriated an adequate travel budget for technology center accreditation visits. However, the financial document provided does not represent the State funding (State appropriations) that was allocated in 2022 to the agency to support accrediting activities. The document does not clearly identify actual expenditures that occurred in 2022.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

While the State of Oklahoma doesn't line item appropriations, the agency does line item budget items. Attached is SB1040 and our budget vs. actual financial report to illustrate our FY22 line items.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the State agency must provide evidentiary documentation regarding its 2022 funding through State appropriations to demonstrate it receives adequate and timely financial support and a budgetary outline of actual expenditures that occurred in 2022. In response, the agency provided the legislative bill that appropriated funding for the State Board of Career and Technology Education (Exhibit 37). The agency also provided an itemized account of its total accreditation budget of ^{(b)(4)} [redacted] for fiscal year 2022 (7/1/2021-6/30/2022), total actual expenditures ^{(b)(4)} [redacted] and the ^{(b)(4)} [redacted] remaining available funds (Exhibit 38). The agency's documentation demonstrates it had adequate funding in fiscal year 2022 to carry out its operations.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(2)(iii)(A)

Description of Criteria

(A) to participate on visiting teams,

Narrative:

The ODCTE Accreditation Division conducts a thorough application process. Applicants apply online, and the accreditation staff reviews the applications. The application captures job titles, job duties, previous experiences, educational background, etc.

See attachment 6 for the 2021 examiner application, pulled from ctYOU. ctYOU is our online system for Accreditation tools and Resources.

See attachment 7 for the 2021 examiner list, with names omitted.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 6 Attachment 6 2021 Accreditation Examiner Application	ATTACHMENT 6 2021 Accreditation Examiner Appl	-	-
Exhibit 7 Attachment 7 2021 Accreditation Examiner List	ATTACHMENT 7 2021 Accreditation Examiners.xls	-	-
Examiner Training Narrative 1	Training Narrative-1-ACCREDITATION-PROCESS-OV	-	-
Examiner Training Narrative 3	Training Narrative-3-ACCREDITATION-TOOL-07012	-	-
Examiner Training Narrative 4	Training NARRATIVE-4-Examiner-Feedback-070121	-	-
Examiner Training Narrative 12	Training NARRATIVE-12-Forms-and-Database-0706	-	-
Examiner Training Narrative Standard 1	Training Narrative-Standard-1-Leadership-and-	-	-
Examiner Training Narrative Standard 2	Training Narrative-Standard-2-Instruction-and	-	-
Examiner Training Narrative Standard 3	Training Narrative-Standard-3-Support-Service	-	-
Examiner Training Narrative Standard 4	Training Narrative-Standard-4-Measurement-and	-	-
Examiner Training Narrative Standard 5	Training Narrative-Standard-5-Personnel.pdf	-	-
Examiner Training Narrative Standard 6	Training Narrative-Standard-6-Operations.pdf	-	-
Examiner Training Narrative Standard 7	Training Narrative-Standard-7-System-Impact.p	-	-
Examiner Training Narrative Technology Center Overview	Training Narrative-Technology-Center-Overview	-	-
Examiner Training Narrative Training Information	Training Technology-Training-Information-and-	-	-
List of Examiner Training	List of Examiners in Training.pdf	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Participation			
Synchronous Virtual Training Presentation	Virtual Examiner Training Presentation 2022.p	-	-
Virtual Training Attendance	Virtual Training sign in.xlsx	-	-
Exported Applications and Agreements	Examiner Application and Agreements.xlsx	-	-
Blank Application and Agreement	Blank Examiner Application.pdf	-	-
All Examiner Confidentiality Agreements	All Examiner Confidentiality Agreements.pdf	-	-
All Examiner Applications	All Examiner Applications.pdf	-	-
Accreditation Guidelines	2023-24 Accreditation Guidelines1.pdf	-	-
Distance Education Program List	Distance Education Program List.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must: 1) provide evidentiary documentation of training to examiners and training specific to distance education, as appropriate; and 2) provide actual completed and signed agreements as well as completed applications for examiners that conducted site visits during the recognition period.

Analyst Remarks to Narrative:

The agency has clear guidelines regarding site team representatives/examiners, as outlined in its accreditation guidelines (Attachment 2). The guidelines indicate the pool of examiners consists of approximately 12-35 members, and the number and composition of team members depend on the size of the technology center and the

anticipated complexity of the onsite visit. The team may include personnel from the Oklahoma Department of Career and Technology Education, certified career and technology education teachers and/or administrators, teacher educators, business and industry representatives, and other classifications of individuals. The selection process for examiners that is outlined in the guidelines involves an online application and a signed examiner agreement that addresses conflict of interest, confidentiality, and other requirements (Attachment 2, Exhibit 2, page 52). The examiner selections are made by the sub-committee of the accreditation advisory committee. Examiners are required to undergo training that involves online training and an onsite visit prep day. The agency has adequate procedures regarding evaluators' qualifications, the selection process, training, and the size and composition of the pool of evaluators. To demonstrate the application of its procedures, the agency provided a blank sample of an application for examiners that addressed background/areas of expertise, conflict of interest, confidentiality, etc. (Attachment 6) and a spreadsheet of its pool of examiners that contained the names and relevant information (Attachment 7).

However, the agency did not 1) provide evidentiary documentation of training to examiners and training specific to distance education, as appropriate and 2) provide actual completed and signed agreements as well as completed applications for examiners that conducted site visits during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Additional supporting documents attached include

- 1) all online training module narratives, a list of examiners that completed training pulled from our online resource, (all examiners complete a quiz after each module), our synchronous virtual training presentation, a synchronous virtual training attendance log,
- 2) an exported spreadsheet of completed applications and agreements pulled from our online resource, and a blank application and agreement from our online resource
- 3) Actual signed examiner confidentiality agreements.
- 4) Actual examiner completed applications.
- 5) All Distance Education program approval visits are conducted by the agency's financial aid specialist and agency program/occupational specialists. All specialists have participated in accreditation examiner training. They are supplied with and

required to read the Distance Education Guidelines that are part of our Accreditation Guidelines (uploaded), pages 91-115. Specialist must also be familiar with the DE Checklist, Clock Hour Guide, Approval Checklist, and Verifying Student Identity Attendance available for all stakeholders at; [Distance Education \(oklahoma.gov\)](https://www.ok.gov/okhrd/DistanceEducation).

Each of those approved to date, have had a mid-year follow-up review to confirm that the school has been successful in meeting requirements.

Once the distance education programs are approved by the Oklahoma State Board of Career and Technology Education, they become part of the institutional accreditation. There are no 100% distance education full-time programs within the Oklahoma CareerTech System. We currently have only have 11 programs within our 29 technology centers with a portion of DE delivery, all approved at less than 50%. The DE program list has been uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must: 1) provide evidentiary documentation of training to examiners and training specific to distance education, as appropriate; and 2) provide actual completed and signed agreements as well as completed applications for examiners that conducted site visits during the recognition period. In response, the agency provided a spreadsheet with accreditation examiner names, experience, education, conflict of interest, scheduling conflicts and other relevant information (Exhibit 7). The agency also provided slides used to train accreditation examiners, which outline the accreditation process and examiner specific responsibilities, examiner assessment questions and form, the feedback report, data collection, accreditation standards and other relevant information (Exhibits 16-28). In addition, the agency provided the list of examiners who participated in training (Exhibit 29-31), a spreadsheet containing information from examiner applications and agreements (Exhibit 32), a blank examiner application outlining information that is required (Exhibit 33), a blank conflict of interest, confidentiality, and commitment agreement document (Exhibit 67), examiner application database information for 2023 (Exhibit 68),

The agency explained in the narrative that financial aid specialist and agency program/occupational specialists conduct all distance education program approval visits and the specialists participate in accreditation examiner training and read distance education guidelines (Exhibit 75, pages 91-115). The agency provided the

list of 29 technology centers with programs that offer less than 50 percent of distance delivery (Exhibit 76).

The agency's documentation of training for examiners (including distance education and examiner applications and agreements are satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(2)(iii)(B)

Description of Criteria

(B) to engage in consultative services for the evaluation and approval process, and

Narrative:

ODCTE Accreditation Division works with other divisions in the State agency. The Resource Center and Media Division assist with ctYOU, our online training, and visit platform, and report writing. The accreditation team also seeks feedback from examiners to improve the evaluation and approval process.

See attachment 8 for email discussions on ctYOU improvements and updates.

See attachment 9 for FY21 examiner survey results.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 8 Attachment 8 Improvement Discussions	ATTACHMENT 8 Improvement Discussions.txt	-	-
Exhibit 9 Attachment 9 Examiner Evaluations 2021	ATTACHMENT 9 Examiner Evaluation 2021 - summa	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency indicates in the narrative that divisions in the State agency assist with the online training platform, the visit platform, and report writing. Examiners also provide feedback to the agency, which is used to improve the evaluation and approval process. The agency provided a compilation of emails from divisional personnel that contain discussions of improvement and updates relative to the online training platform (Attachment 8) and provided an examiner survey results (Attachment 9). The agency also discussed a robust advisory group in 603.24(b)(1)(i).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Not Reviewed

Criteria: 603.24(a)(2)(iii)(C)

Description of Criteria

(C) to serve on decision-making bodies.

Narrative:

The Oklahoma State Board of Career and Technology Education is composed of members appointed by the Governor.

See attachment 10 for the Board selection process.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 10 Attachment 10 State Board Composition	ATTACHMENT 10 State board composition 0121202	-	-
Board Conflict of Interest Forms	Board Conflict of Interest Forms 2023.pdf	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
State Board Conflict of Interest Forms Sept. 2023	State Board Conflict of Interest Forms.pdf	-	-
Updated State Board Bios Sept. 2023	Updated Board Bio's.docx	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide signed conflict of interest forms for the board members.

Analyst Remarks to Narrative:

The State Board of Career and Technology Education (State board) serves as the decision-making body for the accreditation of the State's technology centers. The Oklahoma State legislature created the State Board per Title 70, Section 14-101 of the statute (Attachment 10). The agency also indicated in Attachment 10 that the board consists of nine voting members and the agency outlined the roles and qualifications of board members (i.e., superintendent of public instruction as the chair, members of the state board of education, representatives from congressional districts, and member at large). Board members are appointed by the governor with consent by the senate. The board members bios are posted on the agency's website, and Department staff uploaded a screenshot of the bios. The agency has a policy that establishes the board's term of appointment and parameters of conflict of interest in the agency's rules of operation (Attachment 1). However, the agency did not provide signed conflict of interest forms for the board or any documentation of a board member's recusal, if a recusal for a conflict of interest occurred during the four-year recognition period.

The accreditation guidelines require board members to undergo training (Attachment 2, page 12). The agency provided an agenda and minutes to demonstrate board members received training (Attachments 33 and 34). The agency's policies ensure it has an adequate and qualified decision-making body.

List of Document(s) Uploaded by Analyst - Narrative

Exhibit Title**File Name**

State Board Member Bios

Oklahoma State Board Members.docx

Response:

Conflict of interest forms from Board members uploaded. Our Board has changed. Updated Bios and Conflict of Interest Forms are uploaded.

Analyst Worksheet - Response**Analyst Review Status:**

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the agency must provide signed conflict of interest forms for the board members. In response, the agency provided conflict of interest forms updated bios (Exhibit 78) and conflict of interest forms for its board members (Exhibits 77). The agency also included a conflict of interest form and bio for Michael Brown, who was not included in the original list of members since he was appointed ***. The agency's response is satisfactory and no additional information is needed.

List of Document(s) Uploaded by Analyst - Response**Exhibit Title****File Name**

State Board Member Bios

Oklahoma State Board Members.docx

Criteria: 603.24(a)(3)(i)

Description of Criteria

(i) Maintains clear definitions of approval status and has developed written procedures for granting, reaffirming, revoking, denying, and reinstating approval status:

Narrative:

See attachment 2 for the Accreditation Guidelines, pages 12-16. This describes our procedures for approval status and the definitions.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has clearly established written accreditation procedures, as outlined in the accreditation guidelines (Attachment 2). The guidelines specify that the Oklahoma Board of Career and Technology Education shall take action regarding a technology center's preaccreditation or accreditation status based upon the accreditation documentation, including the examining team's report. The categories of accreditation status are full accreditation, probational accreditation, accreditation dropped, accreditation reinstatement, and candidacy status (Attachment 2, pages 12-13), and the guidelines outline parameters for each category in terms of meeting requirements of the standards. An institution may be found out of compliance with an agency standard, but if the area of non-compliance is not found to seriously detract from the quality of the educational program, the institution may still be granted full accreditation. Institutions failing to meet one or more of the agency's standards resulting in a loss of quality to the education program are placed on probation for one year. If an institution is unable to meet the agency's standards following probation, its accreditation is dropped. After one year, an institution that has been denied accreditation may apply to have its accreditation reinstated. Candidacy status for new institutions is not equivalent to accreditation and is only granted for a period of one year.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(a)(3)(ii)

Description of Criteria

(ii) Requires, as an integral part of the approval and re-approval process, institutional or program self-analysis and on-site reviews by visiting teams, and provides written and consultative guidance to institutions or programs and visiting teams.

Narrative:

See attachment 2 for the Accreditation Guidelines, pages 4-5. This section outlines procedures, including the self-analysis and onsite reviews.

See attachment 11 for Red River Technology Center's self-assessment.

See attachment 12 for a sample of an examiner's self-assessment.

See attachment 21 for an example of an onsite review with Red River Technology Center's agenda.

<u>Document(s) for this Section</u>			
Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 11 Attachment 21 Red River Agenda	ATTACHMENT 21 Red River Combined Agenda.pdf	-	-
Exhibit 12 Attachment 27 Red River Technology Center Application	ATTACHMENT 27 20-21 Red River Technology Cent	-	-
Exhibit 13 Attachment 15 Red River Examiner Statements	ATTACHMENT 15 Red River Examiner Statements.p	-	-
Exhibit 14 Attachment 16 Interview Forms	ATTACHMENT 16 Interview Forms.pdf	-	-
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Exhibit 29 Attachment 11 Red River Self Assessment	ATTACHMENT 11 Red River Technology Center Sel	-	-
Exhibit 30 Attachment 12 Examiner Self Assessment	ATTACHMENT 12 Examiner Self-Assessment.pdf	-	-
Red River Decision Letter	Red River Accreditation Approval Letter1.pdf	-	-
Red River Decision Letter	Red River Accreditation Approval Letter2.pdf	-	-
Red River Decision Letter	Red River Accreditation Approval Letter3.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter for RRTC.

Analyst Remarks to Narrative:

The agency's accreditation guidelines clearly outline the agency's accreditation procedures relative to the self-evaluation study and examining team. The procedures stipulate a technology center that is seeking accreditation must prepare an in-depth self-evaluation study that measures the performance against its standards, and an examining team selected by the accrediting agency must visit the center to determine if the center meets the agency's standards (Attachment 2, pages 4-5). The technology centers are required to undergo a comprehensive review every five years, at which time the center prepares a self-evaluation study that is verified by an on-site examining team with expertise in the programs. The self-evaluation study is tied to the agency's standards and must identify specific areas of strengths and the need for improvement. The procedures require centers to acquire input from current and former students, local boards of education, the technology center's advisory committees, minority groups, agency partners, and others in preparing the self-evaluation study. In terms of the on-site review, the procedures indicate the number and composition of the examining team depend on the size of the technology center and the anticipated complexity of the on-site visit. The examining team conducts interviews with appropriate individuals at the center. Following the on-site review, the examining team develops a detailed feedback summary report. To demonstrate the application of its procedures, the agency provided the Red River Technology Center assessment application (Attachment 27) and self-assessment (Attachment 11), an agenda for the site visit (Attachment 21), examiner statements relative to the site visit interviews (Attachment 15), a blank site visitor interview form containing guided questions (Attachment 16), and a site visit assessment form/report (Attachment 12). However, the agency did not provide an accreditation decision letter for RRTC.

As part of a virtual file review, the agency provided a application and self-assessment scoring, feedback report/site visit report, and decision letter for Mid-America Technology Center, Moore Norman Technology, and Western Technology Center. The agency requires the examiners to provide a statement document and each examiner fills out a score sheet, and the agency staff develops a compilation of both documents into a feedback report. The agency also provided examiner score sheets for the aforementioned school as part of the file review.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Red River Decision Letter uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must provide an accreditation decision letter for RRTC. The agency provided the decision letter, which indicated the board approved RRTC for continued full postsecondary accreditation on January 21, 2021 (Exhibit 9). The agency's documentation is satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(3)(ii)(A)

Description of Criteria

(A) Self-analysis shall be a qualitative assessment of the strengths and limitations of the instructional program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

Narrative:

See attachment 2 for the Accreditation Guidelines, pages 8-9, where it outlines the self-analysis process and all constituents involved, including students, stakeholders, staff, and instructors.

See attachment 27 for Red River Technology Center's application.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 12 Attachment 27 Red River Technology Center Application	ATTACHMENT 27 20-21 Red River Technology Cent	-	-
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Red River Decision Letter	Red River Accreditation Approval Letter2.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter for RRTC.

Analyst Remarks to Narrative:

The agency clearly outlines self-analysis requirements in its accreditation guidelines (Attachment 2). All technology centers are subject to comprehensive reviews at least every five years. As part of the review process, the institution must prepare a self-assessment document with input from a variety of stakeholders, including governing body, administrative staff, teaching faculty, support services staff, students, business and industry, and other customers/stakeholders actively participate in the process. The technology center is required to provide a technology center overview/application and a process and performance review. The center's evaluations must be comprehensive and address strengths and weaknesses in both administrative and programmatic areas. Institutions and their representatives are provided with instruction on what must be addressed in the institutional self-assessment document (Attachment 2, pages 20-50). The agency also provides instructions on the self-assessment application content and format (Attachment 2, page 55). The agency has a self-assessment verification form that has to be signed by the superintendent (Attachment 2, page 58). The agency has a distance education self-assessment application instrument that ensures technology centers consistently address all required elements (Attachment 2, page 94). To demonstrate the application of its policy, the agency provided an application (Attachment 27) and assessment (Attachment 11) for the Red River Technology Center. However, the agency did not provide an accreditation decision letter for

RRTC.

As part of a virtual file review, the agency provided an application and self-assessment scoring, feedback report/site visit report, and decision letter for Mid-America Technology Center, Moore Norman Technology, and Western Technology Center. The agency requires the examiners to provide a statement document and each examiner fills out a score sheet, and the agency staff develops a compilation of both documents into a feedback report. The agency also provided examiner score sheets for the aforementioned school as part of the file review.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Red River Decision Letter Uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must provide an accreditation decision letter for RRTC. The agency provided the decision letter, which indicated the board approved RRTC for continued full postsecondary accreditation on January 21, 2021 (Exhibit 10). The agency's documentation is satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(3)(ii)(B)

Description of Criteria

(B) The visiting team, which includes qualified examiners other than agency staff, reviews instructional

content, methods and resources, administrative management, student services, and facilities. It prepares written reports and recommendations for use by the State agency.

Narrative:

Examiners read the application, participate in Prep Day to discuss application and prepare for the visit with the team, review supplemental documentation provided by the institution they are assigned to, conduct group and individual interviews with institution staff, administration, instructors, students, and stakeholders, complete program observations, write strength and opportunity for improvement statements for the Feedback Report, and score examiner assessments.

See attachment 15 for sample examiner statements.

See attachments 16 for interview form examples.

See attachment 21 for Red River Technology Center’s agenda to validate interview representation.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 11 Attachment 21 Red River Agenda	ATTACHMENT 21 Red River Combined Agenda.pdf	-	-
Exhibit 13 Attachment 15 Red River Examiner Statements	ATTACHMENT 15 Red River Examiner Statements.p	-	-
Exhibit 14 Attachment 16 Interview Forms	ATTACHMENT 16 Interview Forms.pdf	-	-
Red River Decision Letter	Red River Accreditation Approval Letter3.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter for RRTC.

Analyst Remarks to Narrative:

The agency has a sufficient policy regarding on-site visit requirements, as outlined in its accreditation guidelines (Attachment 2, page 9). The agency requires examiners conducting the site visit to provide an application containing qualifications (Attachment 2, page 51) and the examiner has to also sign an agreement regarding requirements, conflict of interest and confidentiality (Attachment 2, page 52). The agency has a structured outline of a typical onsite schedule that involves program site observations, interviews and scripted questions used by examiners and an exit interview (Attachment 2, page 53). The examiner interview questions address instructional content, methods and resources, administrative management, student services, and facilities (Attachment 16). The agency provided an exit interview report for Red River Technology Center (RRTC) in Attachment 22. The agency also provided an example of a feedback report for a site visit of the RRTC in Attachment 28. However, the agency did not provide an accreditation decision letter for RRTC.

As part of a virtual file review, the agency provided a application and self-assessment scoring, feedback report/site visit report, and decision letter for Mid-America Technology Center, Moore Norman Technology, and Western Technology Center. The agency requires the examiners to provide a statement document and each examiner fills out a score sheet, and the agency staff develops a compilation of both documents into a feedback report. The agency also provided examiner score sheets for the aforementioned school as part of the file review.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Red River decision letter uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must provide an accreditation

decision letter for RRTC. The agency provided the decision letter, which indicated the board approved RRTC for continued full postsecondary accreditation on January 21, 2021 (Exhibit 11). The agency's documentation is satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(a)(3)(iii)

Description of Criteria

(iii) Reevaluates at reasonable and regularly scheduled intervals institutions or programs which it has approved.

Narrative:

ODCTE conducts annual programs approvals and 3-year Accreditation Monitoring Visits. During Monitoring Visits, we review the Continuous Improvement Plan developed as a result of the Feedback Report. Also, review completed Corrective Action Plans if any Standards weren't met.

See attachment 2 for the Accreditation Guidelines, pages 8-11, Evaluation and Review Procedures.

See attachment 4 for Red River Technology Center's Timeline as an example of the full cycle.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Exhibit 4 Attachment 4 Red River Timeline	ATTACHMENT 4 Red River Timeline.pdf	-	-
Past, Current, and Future Visit Dates	Past Current and Future Visit Dates.pdf	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Red River Annual Approval Letter and List	Red River Technology Center 2022-2023 Accredi	-	-
Red River Program Approval Screenshots	Red River program approval screen shots.pdf	-	-
Red River Annual Approval with Notes	Red River Program Approval Screenshots with N	-	-
Approval Process Overview for Framework	IFW-ApprovalProcessOverview.pdf	-	-
Red River 3 Year Monitoring Updated Plan	Red River Updated Continuous Improvement Plan	-	-
Red River 3 Year Monitoring Supporting Evidence	Red River Update Supporting Documents.pdf	-	-
Red River 3 Year Monitoring Coorespondence	Red River Monitoring Coorespondence.pdf	-	-
Red River 3 Year Monitoring Completion Letter	Red River Monitoring Completion Letter.pdf	-	-
Moore Norman Corrective Action Plan	Moore Norman Signed Corrective Action.pdf	-	-
Moore Norman Corrective Action Plan Correction Evidence	Moore Norman Corrective Action Plan Correctio	-	-
Moore Norman Board Agenda	Moore Norman Board Agenda.pdf	-	-
Moore Norman Board Minutes	Moore Norman Board Minutes.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide: 1) a schedule for upcoming accreditation reviews that includes the last date of accreditation and the date of the next review cycle; 2) documentation of annual

report for an institution and evidence of an assessment and determination for the report; and 3) a review of an institution that was placed on probation including the corrective action plan and State board decision for that institution; and 4) a continuous improvement plan (CIP) and a three-year monitoring visit report including evidence of the review and decision regarding the CIP and three-year monitoring visit report.

Analyst Remarks to Narrative:

The agency has a policy that clearly outlines the reevaluation of technology centers at reasonable and regularly scheduled intervals. The guidelines indicate that the agency grants full accreditation for an approval period up to five years, contingent upon the successful completion of an annual review (Attachment 2, page 12). The agency's guidelines also address reevaluation of technology centers that are found to be out of compliance with the agency's standards. Such centers are placed on probation and have to submit a corrective action plan within 60 days of board approval. The center on probation has one year to bring themselves into compliance. If the noted deficiencies have not been corrected at the end of the one-year time period, the center's accreditation will be dropped. Under extraordinary circumstances, application may be made to the State board for an additional one-year probationary status.

To demonstrate the application of its policy, the agency provided a diagram of the timelines for a full-cycle review of the Red River Technology Center (RRTC), which indicated the center's application was approved in 2020 and the application deadline for the next cycle is 2025. However, the agency did not provide a schedule for upcoming reviews that includes the last date of accreditation and the date of the next review cycle for all of its accredited technology centers. The agency also did not provide documentation of annual reviews of institutions, including RRTC, and evidence of an assessment and determination relative to the review. The agency must inform Department staff if this situation has not occurred during the recognition period

The agency's guidelines require centers to submit a continuous improvement plan within three (3) months of State Board approval, and the plan is monitored by the state accreditation division and other applicable staff. The agency's accreditation approval is for five years and the agency also conducts a three-year monitoring visit. However, the agency did not provide a continuous improvement plan and evidence of the review and determination regarding the plan or a review of a three-year monitoring visit report. The agency must inform Department staff if this situation has not occurred during the recognition period.

In addition, the agency did not provide evidentiary documentation of the reevaluation

of a center that was placed on probation (e.g., corrective action plan and State board decision) The agency must inform Department staff if this situation has not occurred during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

- 1)Uploaded a list of institutions with past, current and future review cycles.
- 2) Uploaded an annual approval letter and list for Red River, screen shots of Red River's approval process in our software, and approval process overview in our framework.
- 3) During this re-authorization period, there have been no technology centers on probation. Any corrective action item has been completed before the time of Board approval. (See response numbers 5-8 and the additional supporting documents.)
- 4)Red River's 3 Year Monitoring Visit was just completed. The following documents were uploaded: the updated improvement plan, supporting evidence, email correspondence, and the completion letter.
- 5)Uploaded a corrective action plan for Moore Norman Technology Center and
- 6) Uploaded the evidence that Moore Norman's corrective action was corrected before the Board meeting (Board meeting was on Feb. 28 and the email evidence was on Feb. 11)
- 7) Uploaded the Board meeting Agenda that Moore Norman's accreditation was voted on.
- 8) Uploaded the Board meeting Minutes and on page 9 it reflects the corrective action item already corrected.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the agency must provide:

1) A schedule for upcoming accreditation reviews that includes the last date of accreditation and the date of the next review cycle. In response, the agency provided an outline of dates for its institutions' last visit, last accreditation approval date, current visit dates, current approval date, and future visits from 2022-2027 (Exhibit 57). This documentation demonstrates the agency reevaluates institutions every 5 years. For example, Canadian Valley was approved for past accreditation on March 29, 2018 and the current approval date is January 19, 2023.

This is a problem all of their policies indicate a review is require every 5 years. Was their a change to their grant of accreditation period. This could be a big problem. You may need to contact the agency for clarification. Let's discuss. .

2) The agency was also asked to provide documentation of an annual report for an institution and evidence of an assessment and determination for the report. In response, the agency provided an annual approval letter and list of programs approved for the Red River Technology Center (RRTC) in Exhibit 58, screenshots of RRTC's annual data from the agency's reporting system (Exhibit 59), and the review notes (e.g., removal of 800 codes in courses) to demonstrate the RRTC's data was thoroughly assessed (Exhibits 60). Exhibit 61 contains an outline of the tiered review process (the submission of the technology center's annual data, local financial aid approval, the agency's occupational approval, and the agency's financial aid approval).

Program requirements are located in Chapter 20, pages 52-69.

3) The agency was asked to provide a review of an institution that was placed on probation including the corrective action plan and State board decision. The agency indicated in the narrative that there have been no technology centers placed on probation during the recognition period. However, the agency provided a corrective action plan for Moore Norman Technology Center for issues not rising to the level of probation (Exhibit 69), the communication between the agency and the institution regarding the corrective action (Exhibit 70), and the board's agenda and minutes with the board's vote to approve the institution's accreditation since the issues had been corrected (Exhibits 71-72).

4) The agency was asked to provide a continuous improvement plan (CIP) and a three-year monitoring visit report including evidence of the review and decision regarding the CIP and three-year monitoring visit report. In response, the agency provided documentation of a continuous improvement plan for RRTC that addressed opportunities for improvement, timelines and action plans (Exhibit 62) and evidence of the implementation of actions taken (Exhibit 63). The also provided an email sent

to the institution regarding the monitoring visit (Exhibit 64), and a decision letter for the review of RRTC's CIP, which noted the institution showed satisfactory progress (Exhibit 65).

The agency's response is satisfactory and no additional information is needed.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(1)(i)

Description of Criteria

(i) Has an advisory body which provides for representation from public employment services and employers, employees, postsecondary vocational educators, students, and the general public, including minority groups. Among its functions, this structure provides counsel to the State agency relating to the development of standards, operating procedures and policy, and interprets the educational needs and manpower projections of the State's public postsecondary vocational education system;

Narrative:

ODCTE Accreditation division has an advisory committee comprised of technology center staff, State agency staff, students and stakeholders.

See attachment 23 for the membership list.

See attachment 24 for the 2021 meeting agenda.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 15 Attachment 23 Accreditation Advisory Roster	ATTACHMENT 23 Accreditation Adv Comm Roster 2	-	-
Exhibit 16 Attachment 24 Advisory Agenda	ATTACHMENT 24 Advisory May 2021 Agenda Final.	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Advisory Committee	Advisory Committee Roster.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide documentation that demonstrates a public representative is on its advisory committee. All personnel listed on Exhibit 15, Attachment 23, are all employed by the State agency or one of the accredited Technology Centers. The roster does not appear to include any representatives of the public as required by this criterion.

Analyst Remarks to Narrative:

The agency's accreditation guidelines outline the advisory body's function and representation (Attachment 2, page 14). The guidelines indicate the Oklahoma CareerTech Accreditation Advisory Committee (Committee) provides advice to the State agency relating to the development of standards, operating procedures, and policy, and the committee also assists in interpreting educational needs and workforce projections of Oklahoma's public postsecondary career and technology education system. The guidelines also indicate that the committee must be comprised of representatives from public employment services, employers, employees, postsecondary career and technology educators, students, and members of the general public, including minority groups. As documentation, the agency provided a list of its current committee roster (Attachment 23). There are 43 members on the committee that include agency staff, technology center staff, business and industry representatives, and student representatives. Various subject area experts are on the committee in administration, financial aid, information technology, online instruction, student support services, and testing. However, there was no member of the general public presented on the roster, representation from public employment services and employers, presented on the roster. All personnel listed on Exhibit 15, Attachment 23, are all employed by the state agency or one of the accredited Technology Centers. The roster does not appear to include any representatives of the public as required by this criterion. The agency also provided an agenda for the committee that addressed several topics, such as institutional accreditation, accreditation guidelines, and technology center training (Attachment 24).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Advisory Committee with Community Representation Highlighted

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the agency must provide documentation that demonstrates a public representative is on its advisory committee. All personnel listed on Exhibit 15, Attachment 23, are employed by the State agency or one of the accredited Technology Centers. The roster does not appear to include any representatives of the public as required by this criterion. In response, the agency provided an updated roster for the accreditation advisory committee (Exhibits 34) and highlighted the public member who was added in August 2022, after the agency's original application submission. The public member is a customer care director for a company. The agency also provided an agenda for the advisory committee (Exhibit 16) to demonstrate the committee's functions (e.g., institutional accreditation activities, civil rights and financial aid updates, distance education approval process, and accreditation guidelines). The agency's response is satisfactory and no additional information is needed.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(1)(ii)

Description of Criteria

(ii) Demonstrates that the advisory body makes a real and meaningful contribution to the approval process;

Narrative:

See attachment 25 for the 2021 meeting minutes.

See attachment 26 for the email communication with advisory members.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 17 Attachment 25 Advisory Meeting Minutes	ATTACHMENT 25 Advisory Committee Minutes May	-	-
Exhibit 18 Attachment 26 Advisory Committee Communication	ATTACHMENT 26 Accreditation Advisory Committe	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The demonstrated its accreditation advisory committee (committee) provides a meaningful contribution to the approval process by providing meeting minutes in which the committee discussed accreditation issues, such as training of examiners and conducting a hybrid site visits (Attachment 25). The agency also provided email communication from the accreditation manager to the advisory committee in preparation for a meeting in which the committee will discuss updating accreditation guidelines (Attachment 26).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(1)(iii)

Description of Criteria

(iii) Provides advance public notice of proposed or revised standards or regulations through its regular channels of communications, supplemented, if necessary, with direct communication to inform interested members of the affected community. In addition, it provides such persons the opportunity to comment on the standards or regulations prior to their

adoption;

Narrative:

The agency has not had any updates to the Accreditation Guidelines since the approval that would require public comment and Board action.

See attachment 2, the Accreditation Guidelines, page 14, for the rules process.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has a sufficient policy regarding revising its standards that includes public notice and the opportunity for public comment prior to adopting revisions, as outlined in its accreditation guidelines (Attachment 2, page 14). The agency's guidelines include the pecking order of review and approval of changes to standards (e.g., the agency's senior leadership, governor and cabinet secretary, State board, and State legislature), timing of rulemaking notices and the publication (e.g., published more than 30 days before a public hearing occurs in March), and indicates changes become effective in September. The agency did not provide evidentiary documentation of a rulemaking process/the opportunity for public comment because it indicated in the narrative that the agency has not made any changes to standards during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(1)(iv)

Description of Criteria

(iv) Secures sufficient qualitative information regarding the applicant institution or program to enable the institution or program to demonstrate that it has an ongoing program of evaluation of outputs consistent with its educational goals.

Narrative:

Each technology center up for accreditation submits an application based on our Guideline requirements. Information in the application is then verified during the onsite visit.

See attachment 27 for Red River Technology Center's application.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 12 Attachment 27 Red River Technology Center Application	ATTACHMENT 27 20-21 Red River Technology Cent	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has a sufficient policy that requires technology centers to have ongoing program of evaluation of outputs consistent with its educational goals. The agency requires an institution to submit a qualitative self-assessment application that consists of two parts: 1) an overview of key characteristics and strategic situation and 2) a process and performance review, which measures its performance against established standards for its comprehensive accreditation review, which is every 5 years (Attachment 2, page 8). To demonstrate the application of its policy, the agency provided an overview (Attachment 27) and self-assessment (Attachment 11) for the Red River Technology Center. The self-assessment addresses the centers development, deployment and modification of action plans, which involves performance measures and indicators.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Not Reviewed

Criteria: 603.24(b)(1)(v)

Description of Criteria

(v) Encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program;

Narrative:

Innovation is addressed in several standards.

See attachment 2, Accreditation Guidelines, pages 22-48.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Innovation Examples	Innovation Examples.pdf	-	-
Red River Feedback Board Report	Red River Feedback Board Report.pdf	-	-
Red River Continuous Improvement Plan 2021	Red River Continuous Improvement Plan 2021.do	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide

a standard or policy that demonstrates it encourages experimental and innovative programming and also provide evidentiary documentation of such programs if developed during the recognition period.

Analyst Remarks to Narrative:

The agency indicated in the narrative that established standards address innovative programming, and the agency also referred to pages 22-48 of its accreditation guidelines in its narrative, which contains a blank self-analysis instrument with assessment questions under each standard (Attachment 2). However, it is unclear how the assessment questions encourage experimental and innovative programming. The agency, therefore, did not demonstrate how it encourages experimental and innovative programming provide evidentiary documentation.

The agency must provide a standard or policy that demonstrates it encourages experimental and innovative programming and also provide evidentiary documentation of such programs if developed during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

We believe our question in standard 6 (6.1c How does the technology center engage in innovation? How is innovation identified?), encourages innovation based on technology center's responses in their applications/self-assessments, as well as, examiner statements in Feedback Reports. I have attached a document that includes narratives from various technology center applications and examiner statements about innovation from various feedback reports.

Our accreditation process is a continuous improvement model that encourages continuous improvement in all standards. Every technology is required to select one opportunity for improvement from each of the 6 Standards in their Board Feedback Report to work on. I have attached Red River Technology Center's Board Feedback Report and their Continuous Improvement Plan. Updates on these continuous improvement items are discussed during their three year monitoring visit.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that the agency must provide a standard or policy that demonstrates it encourages experimental and innovative programming and also provide evidentiary documentation of such programs if developed during the recognition period. In response, the agency indicated that technology centers (center) are required to address innovation when conducting a self-assessment of performance against accreditation standards. The center scores its performance in accordance with standards from 1 to 5, with a 5 score indicating the center exceeds the standard.

Standard 6.1c requires centers to rate its performance relative to innovation, specifically asking the center how it engages in innovation and how innovation is identified, as outlined in the accreditation guidelines (Exhibit 2, page 42). The agency provided an excerpt narrative of several centers' self-assessment answers relative to innovation management under 6.1c as well as the corresponding the excerpt narrative from the examiners' feedback report (Exhibit 39). The agency also provided an 2020-2021 application/overview for the Red River Technology Center (RRTC) that addressed Standard 6.1c (Exhibit 12, page 53), and the 2020 feedback report for RRTC indicated the center met all requirements of Standard 6.1 (Exhibit 73, page 7). The agency also provided the continuous improvement plan for RRTC for 2021, which address any required improvements for the center relative to 6.1c (Exhibit 74). The agency's response is satisfactory and no additional information is needed.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(1)(vi)

Description of Criteria

(vi) Demonstrates that it approves only those institutions or programs which meet its published standards; that its standards, policies, and procedures are fairly applied; and that its evaluations are conducted and decisions are rendered under conditions that assure an impartial and objective judgment;

Narrative:

See attachment 28 for Red River Technology Center's Board Feedback Report. The Feedback reports demonstrate whether the institutions meet the Board approved standards.

See attachment 29 for the Board agenda that included Red River Technology Center Accreditation as an action item.

See attachment 30 for the Board minutes that include Red River Technology Center's Board approval.

<u>Document(s) for this Section</u>			
Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 19 Attachment 28 Red River Technology Center Feedback Report	ATTACHMENT 28 Red River Technology Center Fee	-	-
Exhibit 20 Attachment 29 Board Agenda	ATTACHMENT 29 January2021CTBoardMeetingCorrec	-	-
Exhibit 21 Attachment 30 Board Minutes	ATTACHMENT 30 January2021CTBoardminutessigned	-	-
Red River Decision Letter	Red River Accreditation Approval Letter4.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter for RRTC.

Analyst Remarks to Narrative:

The agency outlines the institutional approval process in its accreditation guidelines (Attachment 2). To ensure its evaluations are conducted and decisions are rendered under conditions that assure an impartial and objective judgment, the agency has written standards in the guidelines that are approved by the State board of Career and Technology Education (State board), institutions are required to submit a self-study in accordance with the guidelines, a team of qualified examiners conduct onsite evaluations to verify the information that is provided in the institution's self-study, and the State board makes the accreditation decisions based on the review of the self-

study, feedback report of examiners, the institution's response/comments and other pertinent documentation. To facilitate consistency and fairness, the guidelines also require examiners and the State board to undergo training, and the training addresses conflict of interest and confidentiality (Attachment 2, page 11-12). The agency also has established policies and rules/regulations for its administration and operations, which includes information on the standards and the accreditation review process (Attachment 1). To demonstrate the application of its policy, the agency provided the State board agenda (Exhibit 29) and minutes (Exhibit 31), which included the State board approval of accreditation for Red River Technology Center (RRTC). The agency also provided RRTC's application (Attachment 27), self-assessment (Attachment 11) and an examiner feedback report (Attachment 28). However, the agency did not provide an accreditation decision letter for RRTC.

As part of a virtual file review, the agency provided a application and self-assessment scoring, feedback report/site visit report, and decision letter for Mid-America Technology Center, Moore Norman Technology, and Western Technology Center. The agency requires the examiners to provide a statement document and each examiner fills out a score sheet, and the agency staff develops a compilation of both documents into a feedback report. The agency also provided examiner score sheets for the aforementioned school as part of the file review.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Red River decision letter uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that agency must provide an accreditation decision letter for RRTC. In response, the agency provided a decision letter that approved continued full postsecondary accreditation (certificate of accreditation) for RRTC on January 21, 2021 (Exhibit 1).

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(1)(vii)

Description of Criteria

(vii) Regularly reviews its standards, policies and procedures in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the students;

Narrative:

The Accreditation Guidelines are reviewed regularly through advisory committee meetings, staff meetings, and Board training.

See attachment 24 for the advisory committee meeting agenda.

See attachment 25 for advisory committee meeting minutes.

See attachment 33 for the Board agenda that includes training.

See attachment 34 for Board minutes.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 16 Attachment 24 Advisory Agenda	ATTACHMENT 24 Advisory May 2021 Agenda Final.	-	-
Exhibit 17 Attachment 25 Advisory Meeting Minutes	ATTACHMENT 25 Advisory Committee Minutes May	-	-
Exhibit 22 Attachment 33 Board Training Agenda	ATTACHMENT 33September2021CTBoardAgendafinal.	-	-
Exhibit 23 Attachment 34 Board minutes	ATTACHMENT 34 september-2021-ct-board-minutes	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has a written policy that addresses the review of accreditation standards and policies and procedures, as outlined in the accreditation guidelines (Attachment 2, pages 13-14 and 17). On an annual basis, the standards, operating procedures, and policies are reviewed by the Oklahoma CareerTech Accreditation Advisory Committee (Committee), and the committee makes recommendations to the Oklahoma State Board of Career and Technology Education (State board), which is responsible for approving the agency's standards. The committee solicits public input for a minimum of 30 days before recommendations are sent to the State board for approval. The agency provided an agenda and minutes for the Committee, which demonstrates the accreditation guidelines, including the standards, were discussed by the committee (Attachments 24-25), and an agenda and minutes for the State board to demonstrate procedures were discussed (Attachments 33-34).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Not Reviewed

Criteria: 603.24(b)(1)(viii)

Description of Criteria

(viii) Performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational institution or program;

Narrative:

The ODCTE Accreditation staff facilitate the processes on behalf of the Oklahoma Board of Career and Technology Education. Examiners are screened prior to being selected and approved.

See attachment 2, Accreditation Guidelines, pages 11-12, for the examiner selection process.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency demonstrates that it has standards, policies, and procedures in place that enable it to make an independent judgment regarding the quality of its technology centers. The agency thoroughly outlines its standards, policies and procedures in the accreditation guidelines (Attachment 2). The State board establishes the policies and standards pertaining to the accreditation process and makes an independent judgment regarding the quality of technology centers through self-studies and site team reports. The accreditation guidelines establish a consistent process for self-studies (e.g., self-study instrument with questions and formatting) and for examiners (e.g., qualifications, selection process, training and execution of site visits).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Not Reviewed

Criteria: 603.24(b)(1)(ix)

Description of Criteria

(ix) Has written procedures for the review of complaints pertaining to institutional or program quality as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner fair and equitable to the complainant and to the institution or program;

Narrative:

See attachment 2, Accreditation Guidelines, page 16, for complaint procedures.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Evidence of complaint process	Student Complaint.pdf	-	-
Email evidence of complaint	Evidence of Complaint Email	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
process	Process.pdf		

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide evidentiary documentation of a complaint that has been resolved to demonstrate the application of its policy or indicate a complaint has not been received during the recognition period.

Analyst Remarks to Narrative:

The agency has a clearly written policy that addresses procedures for the review of complaints relative to the quality of programs and services, and the procedures are adequate to provide timely treatment of complaints in a manner fair and equitable to complainants, as outlined in accreditation guidelines (Attachment 2, page 16). The complaint procedures include the hierarchy of review and resolution involving the chief executive officer, center's governing board, and the State Board, as well as the timelines for the review. However, the agency did not provide evidentiary documentation of a complaint that has been resolved to demonstrate the application of its policy or indicate a complaint has not been received during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Evidence of the agency's complaint process application uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the agency must provide evidentiary documentation of a complaint that has been resolved to demonstrate the application of its policy or indicate a complaint has not been received during the recognition period. To demonstrate the application of its complaint procedures, the agency provided an example of a complaint from April 13, 2022 (Exhibit 46) regarding inappropriate behavior of school personnel. The agency also provided its initial (April 18, 2012) five days after receiving the complaint and its final response to the complainant dated April 19, 2022 (Exhibit 47), directing the complainant to the president of the school board and assistant superintendent. Department staff uploaded emailed documentation from the agency with the date of the final resolution (Exhibit 80). The agency adhered to its complaint policy (Exhibit 2, page 16) since it contacted the complainant within five working days, directed the complainant to the appropriate institutional representatives, and indicated the agency will assist further, if necessary. The agency's response is satisfactory and no addition information is needed.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(1)(x)

Description of Criteria

(x) Annually makes available to the public (A) its policies for approval, (B) reports of its operations, and (C) list of institutions or programs which it has approved;

Narrative:

The ODCTE Accreditation website includes the accredited technology center list, Accreditation Guidelines, and approved program list.

<https://oklahoma.gov/careertech/technology-centers/accreditation.html>

Document(s) for this Section

No files uploaded

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency indicated in its narrative that the accredited technology center list, accreditation guidelines, and approved program list are posted on the agency’s website, <https://oklahoma.gov/careertech/technology-centers/accreditation.html>. Department staff verified that the lists and policies/operations are available on the agency’s website and uploaded relevant screenshots of the information. The agency satisfies requirements of this section.

List of Document(s) Uploaded by Analyst - Narrative

Exhibit Title	File Name
	ok 1.png
	ok 3.jpg
	ok 4.png
	ok2.png

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(1)(xi)

Description of Criteria

(xi) Requires each approved school or program to report on changes instituted to determine continue compliance with standards or regulations;

Narrative:

See attachment 2, Accreditation Guidelines, page 8, section E. This covers the evaluation and review procedures conducted.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Central DE Application	Central Tech DE Applications.pdf	-	-
Central Tech Board Feedback	Central Tech DE Board Feedback	-	-

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Report	Report.pdf		
Central Tech Approval Letter	Central DE Approval Letter.pdf	-	-
June 2022 Board Meeting Agenda	June 16, 2022 CT Board Regular Meeting Agenda	-	-
June 2022 Board Meeting Minutes	2022-june-16-board-minutes-signed.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide evidentiary documentation of the application of its policy, such a substantive change request/notification from an institution and decision regarding the change; or indicate the agency has not had a substantive change request from a technology center during the recognition period.

Analyst Remarks to Narrative:

The agency has an adequate policy regarding school/program changes, as outlined in the accreditation guidelines (Attachment 2, page 8). The guidelines require a technology center to report (within 30 days) any substantive change (a significant modification or expansion in the nature and scope of an accredited institution) that might affect its accreditation status. However, the agency did not provide evidentiary documentation of the application of its policy, such a substantive change request/notification from a technology center and decision regarding the change; or indicate the agency has not had a substantive change request from a technology center during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Central Technology Center submitted an application for Distance Education approval for a program. The application, Board Feedback Report, decision letter, Board agenda and minutes have been uploaded to provide documentation of a substantive change of wanting to offer distance education. No other substantive change request has occurred during the reauthorization period.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that agency must provide evidentiary documentation of the application of its policy, such as a substantive change request/notification from an institution and decision regarding the change; or indicate the agency has not had a substantive change request from a technology center during the recognition period. In response, the agency provided documentation of its substantive change process:

Central Technology Center's (CTC) self-assessment application for distance education (Exhibit 40), the corresponding feedback report for CTC (Exhibit 41), the approval letter for CTC to offer distance education (Exhibit 42), the board agenda that includes the discussion and vote for CTC to offer distance education (Exhibit 43), and the meeting minutes demonstrating the vote and approval by the board (Exhibit 44).

The agency's response was satisfactory and no additional information is required.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(1)(xii)

Description of Criteria

(xii) Confers regularly with counterpart agencies that have similar responsibilities in other and neighboring States about methods and techniques that may be used to meet those responsibilities.

Narrative:

The ODCTE Accreditation Division meets annually with Pennsylvania to discuss best practices as their system is the most similar to ours. The Financial Aid Specialist and

Civil Rights Coordinators regularly confers with other agencies.

See attachment 35 for Zoom meeting confirmation with Pennsylvania, email correspondence from the Financial Aid Specialist and Civil Rights Coordinator.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 24 Attachment 35 Communication	ATTACHMENT 35 Communication.txt	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency, as stated in the narrative, meets annually with Pennsylvania to discuss best practices since it has a similar system, and the financial aid specialist and civil rights coordinators regularly confer with other agencies. The agency provided documentation of communication between its accreditation manager and a person who oversees accreditation of postsecondary career and technical education at the Pennsylvania Department of Education regarding Oklahoma's structure and processes (Attachment 35). The agency has demonstrated that it confers regularly with counterpart agencies that have similar responsibilities in other and neighboring States about methods and techniques that may be used to meet those responsibilities.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(2)(i)

Description of Criteria

(i) Provides for adequate discussion during the on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

Narrative:

During the onsite visit examiners interview students, administration, faculty, staff,

stakeholders, and business and industry clients. Examiners also give an exit report to the technology center administration and any staff that the administration wants to be included. There is an opportunity for technology center staff to ask questions during the Exit Report.

See attachment 21 for Red River Technology Center’s agenda.

See attachment 16 for example interview forms.

See attachment 22 for Red River Technology Center’s Exit Report that the examiners presented.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 11 Attachment 21 Red River Agenda	ATTACHMENT 21 Red River Combined Agenda.pdf	-	-
Exhibit 14 Attachment 16 Interview Forms	ATTACHMENT 16 Interview Forms.pdf	-	-
Exhibit 25 Attachment 22 Red River Exit Report	ATTACHMENT 22 Exit Presentation - Red River.p	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has an adequate policy that details the onsite visit process, as outlined in the accreditation guidelines (Attachment 2, page 9). The policy requires the visiting team to conduct interviews with a variety of individuals, such as staff, students, stakeholders, and other deemed to be necessary for the team to gather information needed to complete the review and verification of the information provided in the self-assessment application. To demonstrate the application of its policy, the agency provided an agenda for the site visit of Red River Technology Center (Attachment 21), which indicates the team interviewed stakeholders, administrative staff, students and instructors. The agency also provided a blank form that the visiting team uses to interview a technology center’s administration (Attachment 16) and a visiting team’s PowerPoint exit report for Red River Technology Center’s Exit Report (Attachment 22).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(2)(ii)

Description of Criteria

(ii) Furnishes as a result of the evaluation visit, a written report to the institution or program commenting on areas of strength, areas needing improvement, and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

Narrative:

See attachment 28 for Red River Technology Center's Board Feedback Report.

Document(s) for this Section

No files uploaded

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has an adequate policy that requires the visiting team to communicate findings through a feedback/summary report, as outlined in the accreditation guidelines (Attachment 2, page 9). The policy indicates the feedback report must include strengths and actionable items (corrective and opportunities for improvement) related to each of the accreditation standard items. To demonstrate application of its policy, the agency provided a visiting team feedback report for the Red River Technology Center and the report included strengths, areas needing improvement and compliance with each standard (Attachment 28).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(2)(iii)

Description of Criteria

(iii) Provides the chief executive officer of the institution program with opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the agency takes action on the report;

Narrative:

ODCTE Accreditation Division puts the examiner's comments into the report and makes any necessary edits. The report is sent to the school and they have 30 days to supply any rebuttals. ODCTE Accreditation Division considers the rebuttals and makes updates to the report if adequate evidence is provided by the technology center. The report then goes to the State Board of Career and Technology Education for approval.

See attachment 40 for the email correspondence with Red River Technology Center.

See attachment 41 for Red River Technology Center's Rebuttal response.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 26 Attachment 40 Red River Correspondence	ATTACHMENT 40 Red River Correspondence.txt	-	-
Exhibit 27 Attachment 41 Red River Rebuttal	ATTACHMENT 41 Red Rive Rebuttal.txt	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has an adequate policy that requires it to give the chief executive officer of a technology center an opportunity to comment on the visiting team's written report and file supplemental material pertinent to the facts and conclusions in the written report within thirty (30) days of receipt of the report before action is taken, as outlined in the accreditation guidelines (Attachment 2, page 10). The agency provided a notice to Red River Technology Center (RRTC) regarding the visiting team's feedback report, which indicated the technology center could provide comments and supplemental materials (Attachment 40). In addition, the agency provided RRTC's written response to the feedback report (Attachment 41).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(2)(iv)

Description of Criteria

(iv) Provides the chief executive officer of the institution with a specific statement of reasons for any adverse action, and notice of the right to appeal such action before an appeal body designated for that purpose;

Narrative:

See attachment 42 for email correspondence with a superintendent that received a corrective action.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 28 Attachment 42 Corrective Action Correspondence	ATTACHMENT 42 Corrective Action.txt	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide evidentiary documentation of a notification of an adverse action to a technology center that outlines the reasons and the right to appeal or indicate the agency has not had an adverse action during the recognition period.

Analyst Remarks to Narrative:

The agency has an adequate policy on adverse action the right to appeal notification,

as outlined in the accreditation guidelines (Attachment 2, page 15). The policy indicates that technology centers will be notified in writing of decision(s) that affect accreditation status and the basis for such decision(s) within ten working days of such decision(s). The policy also indicates that technology centers will receive reasonable notification of adverse action and will be given an opportunity for a hearing prior to directing action that might adversely affect the institution's accreditation status. The agency provided a letter containing feedback from a site visit that identified a noncompliance, which required a corrective action plan from the technology center (Attachment 42). The letter demonstrates the agency notifies technology centers of noncompliance before taking any adverse action. However, the agency did not provide evidentiary documentation of a notification of an adverse action to a technology center that outlines the reasons and the right to appeal or indicate the agency has not had an adverse action during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

The agency has not had an adverse action during the recognition period.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated the agency must provide evidentiary documentation of a notification of an adverse action to a technology center that outlines the reasons and the right to appeal or indicate the agency has not had an adverse action during the recognition period. In response, the agency indicated that it had no adverse action during the recognition period.

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(b)(2)(v)

Description of Criteria

(v) Publishes rules of procedure regarding appeals;

Narrative:

See attachment 2, Accreditation Guidelines, pages 15-16, for the appeal process.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency has adequate appeals procedures that are outlined in its accreditation guidelines (Attachment 2, pages 15-16). The guidelines specify what accreditation decisions a technology center can appeal (not to accredit, to terminate the accreditation, or to reduce the accreditation status), and it addresses the accreditation decision notice and the opportunity for an appeals hearing. Department staff verified the accreditation guidelines are posted on the agency's website, <https://oklahoma.gov/careertech/technology-centers/accreditation.html>, and uploaded a screenshot of the information obtained from the website.

List of Document(s) Uploaded by Analyst - Narrative

Exhibit Title	File Name
	Accreditation.docx
	Accreditation1.docx

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(2)(vi)

Description of Criteria

(vi) Continues the approval status of the institution or program pending disposition of an appeal;

Narrative:

The State Board of Oklahoma Career and Technology Education has not had a technology center appeal their accreditation status. However, policy is written in the Accreditation Guidelines, pages 15-16 that the approval process will continue.

See attachment 2, Accreditation Guidelines, pages 15-16, for the appeal process.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency sufficiently specifies in under its appeals procedures that the accreditation status of a technology center shall not change during the time that an appeal is under consideration, as outlined in the accreditation guidelines (Attachment 2, page 16). The agency indicated in the narrative under that it has not had a technology center appeal their accreditation status during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(b)(2)(vii)

Description of Criteria

(vii) Furnishes the chief executive officer of the institution or program with a written decision of the appeal body including a statement of its reasons therefore.

Narrative:

The State Board of Oklahoma Career and Technology Education has not had a technology center appeal their accreditation status. However, policy is written in the Accreditation Guidelines, pages 15-16.

See attachment 2, Accreditation Guidelines, pages 15-16, for the appeal process

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Narrative:

The agency specifies in its appeals procedures, as outlined in the accreditation guidelines (Attachment, page 15) that the appealing party(s) or individual(s) will be notified in writing of the decision reached at the hearing and the reason thereof within 30 days of the appeal hearing. The agency has an adequate policy in place to ensure an appellant is notified in writing of decision/reasons regarding appeals. The agency indicated in the narrative under 603.24(b)(2)(vi) that it has not had a technology center appeal their accreditation status during the recognition period.

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Analyst Worksheet - Response

Analyst Review Status:

Criteria: 603.24(d)(1)

Description of Criteria

- (1) Promotes a well-defined set of ethical standards governing institutional or programmatic practices, including recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services;

Narrative:

Ethics is addressed in several of the Accreditation Standards and verified during

Accreditation visits.

See Attachment 2, Accreditation Guidelines:

Page 24, Standard 1.2

Page 27, Standard 2.1a(4), 2.1c(6)

Page 30, Standard 3.1a(4), 3.1c(2)

Page 31, Standard 3.2a(2)

Page 31, Standard 3 Met/Not Met Standards

Pages 45-47, Standard 6.5

See Attachment 43 for Exhibit 6 requirements

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Exhibit 2 Attachment 2 Accreditation Guidelines	ATTACHMENT 2 Accreditation Guidelines.pdf	-	-
Red River Decision Letter	Red River Accreditation Approval Letter5.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter for RRTC.

Analyst Remarks to Narrative:

Note: The e-Recognition system erroneously included section 603.24(d), which is no longer part of the regulations that were effective in July 2020. Therefore, the agency's response to this section actually applies to section 603.24 (C)(i) in accordance with the current regulations.

The agency has an adequate standard that outlines requirements related to institutional ethical practices, as outlined in the accreditation guidelines (Attachment 2). Standard 1.2 of the agency's standards specifically requires technology centers to have enforceable written policies and procedures in place that demonstrate its ethical

practices includes recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services (Attachment 2, page 17). The agency has a well-defined set of ethical standards that includes recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services. To demonstrate the agency ensures technology centers adhere to requirements of Standard 1.2, the agency provided the Red River Technology Center (RRTC) self-assessment (Attachment 11) and the visiting team's feedback report (Attachment 28) and the team determined RRTC met requirements of Standard 1. The agency also provided the examiners comments for RRTC (Attachment 23). However, the agency did not provide an accreditation decision letter for RRTC.

As part of a virtual file review, the agency provided a application and self-assessment scoring, feedback report/site visit report, and decision letter for Mid-America Technology Center, Moore Norman Technology, and Western Technology Center. The agency also provided documentation of ethics reviews for the aforementioned schools as part of the file review (e.g., civil rights document that was completed by the school and checked by financial specialist and civil rights coordinator).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Red River decision letter uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that agency must provide an accreditation decision letter for RRTC. In response, the agency provided a decision letter that approved continued full postsecondary accreditation (certificate of accreditation) for RRTC on January 21, 2021 (Exhibit 1). For correction in accordance with the new regulation published July 1, 2020, this section numbering is 602.24(c)(i).

List of Document(s) Uploaded by Analyst - Response

No file uploaded

Criteria: 603.24(d)(2)

Description of Criteria

(2) Maintains appropriate review in relation to the ethical practices of each approved institution or program.

Narrative:

To receive state and federal funding our technology centers must be accredited and programs are reviewed annually. Technology Centers have to be accredited to exist in Oklahoma.

Document(s) for this Section

Exhibit Title	File Name	Analyst Comments	Agency's Exhibit Comments
Red River Decision Letter	Red River Accreditation Approval Letter6.pdf	-	-

Analyst Worksheet- Narrative

Analyst Review Status:

Does not meet the requirements of this section

Staff Determination:

The agency does not meet the requirements of this criterion. The agency must provide an accreditation decision letter for RRTC.

Analyst Remarks to Narrative:

Note: The e-Recognition system erroneously included section 603.24(d), which is no longer part of the regulations that were effective in July 2020. Therefore, the agency's response to this section actually applies to section 603.24 (C)(ii) in accordance with the current regulations.

The agency has adequate standards that outline requirements related to institutional ethical practices, as outlined in the accreditation guidelines (Attachment 2, page 17). Standard 1, Leadership and Administration, addresses an institution's ethical responsibilities and requires the institution to demonstrate it has enforceable written ethical policies and procedures in place. The agency has other requirements that are related to ethical practices under Standards 1.2, 2.1a(4), 2.1c(6), 3.1a(4), 3.1c(2),

3.2a(2), and 6.5 (Attachment 2, pages 24, 27, 30, 31, and 45-47). The agency also has a thorough technology center ethics policy for the accreditation of postsecondary institutions in Oklahoma under the jurisdiction of the State Board of Career and Technology Education (Attachment 2, page 86). The policy details ethical parameters for the institution and its personnel that are intended to protect the students from misinformation in the marketing, recruiting and admissions process as well as to ensure institutions have an adequate student refund policy. The agency's policy ensures each approved institution is appropriately reviewed in relation to ethical practices. To demonstrate the application of its policy, the agency provided the Red River Technology Center (RRTC) self-assessment (Attachment 11) and team evaluation (Attachment 28) and the team determined the institution met requirements of Standard 1. However, the agency did not provide an accreditation decision letter for RRTC.

As part of a virtual file review, the agency provided a application and self-assessment scoring, feedback report/site visit report, and decision letter for Mid-America Technology Center, Moore Norman Technology, and Western Technology Center. The agency also provided documentation of ethics reviews for the aforementioned schools as part of the file review (e.g., civil rights document that was completed by the school and checked by financial specialist and civil rights coordinator).

List of Document(s) Uploaded by Analyst - Narrative

No files uploaded

Response:

Red River decision letter uploaded.

Analyst Worksheet - Response

Analyst Review Status:

Meets the requirements of this section

Analyst Remarks to Response

The draft staff analysis indicated that agency must provide an accreditation decision letter for RRTC. In response, the agency provided a decision letter that approved continued full postsecondary accreditation (certificate of accreditation) for RRTC on January 21, 2021 (Exhibit 1). For correction in accordance with the new regulation published July 1, 2020 this section numbering is 602.24(c)(ii).

List of Document(s) Uploaded by Analyst - Response

No file uploaded

3rd Party Written Comments

Document Title	File Name	Pro/Con
-	-	CON

Staff Analysis of 3rd Party Written Comments

The Department received one written comment regarding this agency, but most of it is unrelated to the agency's compliance with the recognition regulations. The comment stated that the Department's solicitation of written third-party comments occurred without access to the agency's petition or related materials. The Department's solicitation of written third-party comments sought comment on the agency's compliance with the regulations in question pursuant to 34 C.F.R. §§ 602.32(c) and (l), not on the agency's petition or related materials. The purpose of the call for written third-party comment is to allow anyone who has any knowledge of an agency undergoing a recognition review by the Department and the agency's compliance or non-compliance with Departmental regulations to provide that information and/or documentation so that Department staff can utilize it in the comprehensive analysis of the agency. The comment also stated that complaint processes used by accrediting agencies should be more accessible to complainants. The Department's recognition review process assesses whether or not an agency meets the Secretary's Recognition Procedures for State Agencies (Procedures) at 34 C.F.R. Part 603. The Procedures include a requirement that an agency must review in a timely, fair, and equitable manner any complaint it receives pertaining to institutional or program quality, per 34 C.F.R. § 603.24(b)(1)(ix). Department staff provided the analysis of the agency's complaint procedures in that section. The comment noted the Sweet v. Cardona case and settlement and stated that NACIQI should review accrediting agencies and their actions related to individual institutions included in the case. There is no specific requirement included in the Procedures to review an institution's compliance with its title IV, HEA program responsibilities. However, Department staff use information and documentation related to individual institutions to ensure that a State agency acts in accordance with both its own policies and procedures and with the Procedures. Note that the recognition review process is not intended to review individual institutions that are accredited by the State agency, but the State agency itself.

Response to 3rd Party Comments

No response to 3rd Party Written Comments

Document(s) Uploaded in response to 3rd Party Comments

No files were uploaded in response to 3rd Party Comments.

3rd Party Request for Oral Presentation

There are no oral comments uploaded for this Agency.