

Retention Waivers

- **Active Military**
 - Papers verifying assignment to active duty.
 - Completers and Graduates as well as spouses and dependents of military personnel who have moved due to military transfer orders are included.
- **Incarceration**
 - Documentation that the completer or graduate was incarcerated during the reporting period and served a criminal sentence in a Federal, State or local penitentiary, prison, jail, or other similar correctional institution.
 - Students under house arrest are included. Students sentenced to serve for less than one month, only on weekends or in a half-way house are not eligible.
 - Documentation must be maintained in the student's file at the campus
- **Death**
 - Copy of an obituary or other written confirmation from relative or friend.



11 1.3.19 ACICS PVP and DIR

Placement Waivers

- **Pregnancy, death, or health-related issues**
 - Written information from a relative that completer or graduate was pregnant or gave birth at some time during the reporting period for placements.
 - Written information from family or friend, or obituary.
 - Written information that the completer, graduate or someone in the immediate family required hospitalization, bed rest or rehabilitation for at least a four-month period during the reporting period.
- **Continuing Education**
 - Enrollment agreement or letter of acceptance as a full-time student into a new educational program that is 300 hours or longer in length.
- **Active Military**
 - Papers verifying assignment to active duty. b) Completers and Graduates as well as spouses and dependents of military personnel who have moved due to military transfer orders are included.



12 1.3.19 ACICS PVP and DIR

Placement Waivers

- **Visa Restrictions**
 - Documentation of the visa, of the lack of opportunities for paid practical training and of the location of the completer or graduate in the US for some time during the reporting period.
 - Graduates are not considered “Not Available” just because they have moved to another country.
- **Incarceration**
 - Documentation that the completer or graduate was incarcerated during the reporting period and served a criminal sentence in a Federal, State or local penitentiary, prison, jail, or other similar correctional institution.
 - Students under house arrest are included. Students sentenced to serve for less than one month, only on weekends or in a half-way house are not eligible.
 - Documentation must be maintained in the student’s file at the campus.



13 1.3.19 ACICS PVP and DIR



14 1.3.19 ACICS PVP and DIR

Accreditation Staff Training & Meeting Agenda, Spring 2018

Thursday, April 26, 2018

11:00am – 2:00pm

11:00am – Noon: *Assuring Quality in Specific Populations - International Students*
Presenter: Perliter Walters-Gilliam

Noon – 12:30pm: Break

12:30pm – 2:00pm: Post-Winter & Pre-Spring 2018 Meeting

1. Post-Winter Discussion for Spring Preparation
2. TRIC-Related Items for Discussion (Karly/Linda)
3. Council Action Preparation Review (Karly)
4. Evaluation Visit Invoicing and Payment (PWG)
5. Procedural Changes/Memo to the Field/*Accreditation Criteria*
6. Visit Management I: Visit Preparation
 - a. Full Team Composition Requirements – Academic/Administrative/Public
 - b. Evaluators
 - i. Needs and Concerns
 - ii. Conflicts of Interest
 - iii. 2018 Attestations
 - c. Consideration of the Record of Complaints & Review of External Information
 - d. Pre-Visit Communications
 - i. Notice to State Agencies
 - ii. Sufficient opportunity to identify conflicts of interest
7. Visit Management II: Onsite Evaluation
 - a. Pre-visit team meeting – Required Review & Briefing
 - b. Student Achievement Review

Open Discussion

Thank you for your continued diligence and commitment!

Spring 2018 Accreditation Staff Training & Meeting

Staff Sign-in Sheet

| Name | Role | Signature |
|----------------------------------|--|-----------|
| Boyd, LaToya | Accreditation Coordinator | (b)(6) |
| Edwards, Michelle | President & CEO | |
| Kouko, Cathy | Accreditation Coordinator | |
| Lundberg, Linda | Accreditation Content Editor | |
| McDuffie, Andre | HR Generalist; Accreditation Coordinator | |
| Walters-Gilliam, Perliter | Vice President of Accreditation | |
| Zeigler, Karly | Manager, Institutional Compliance | |



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

**ACCREDITATION STAFF TRAINING SPRING
2018:**

Assuring Quality in Specific Populations - International Students

Perliter Walters-Gilliam



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

Being an International Student in the US

1. Background
2. Getting into the US
3. Staying in the US
4. Leaving the US



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

External Considerations

1. Security Concerns
2. Immigration Issues
3. Employment/Job Availability



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

Educating & Monitoring International Students

1. Authorization by Department of Homeland Security
2. Demonstrating Academic Quality
3. Providing Oversight



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

International Students at ACICS-Accredited Institutions

1. Background/Purpose for Consideration
2. Purview of the Accreditation Process
3. Ensuring Compliance with Federal Requirements



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

Components of Review

1. Percentage of Population on Visas
2. Evidence of Approval by SEVP
3. Administrative Oversight
4. Record-Keeping



ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS



Pre-Visit Meeting and Training Winter 2018

AGENDA

- 1:30pm – 2:00pm: *The Recognition Petition and the Onsite Evaluation Process*
Presenter: Perliter Walters-Gilliam
- 2:00pm – 3:30pm: Pre-Travel Meeting:
1. IT Update – Remote Desktop
 2. Report Expensing Updates & Review (Winston/Andre)
 3. Post-Council Review & Feedback
 - a. TRIC Follow up
 - b. Motion Letter Preparation
 4. Procedural Changes/Memo to the Field/*Accreditation Criteria*
 - a. Enrollment Agreement Revision
 - b. Graduation Rate Guidelines (CEP Impact)
 - c. January 2018 *Accreditation Criteria*
 5. Visit Management I: Visit Preparation
 - a. Administrative Requirements: Calendar, Personify
 - b. Team Composition Requirements
 - c. Evaluators – Needs and Concerns
 - d. Consideration of Complaints & External Information
 - e. Pre-Visit Communications
 6. Visit Management II: Onsite Evaluation
 - a. Pre-visit team meeting – Required Review
 - b. Team Report Template Changes
 - c. Overview of Team Report Editing Process
 - d. PVP Review
 7. Open Discussion

Staff Sign-in Sheet

| Name | Role | Signature |
|----------------------------------|---|-----------|
| Boyd, LaToya | Accreditation Coordinator | (b)(6) |
| Edwards, Michelle | President & CEO | |
| Kouko, Cathy | Accreditation Coordinator | |
| Lundberg, Linda | Accreditation Content Editor | |
| McDuffie, Andre | Sr. HR Coordinator/Staff Coordinator | |
| Morrison, Katie | Sr. Coordinator, Accreditation Compliance | |
| Walters-Gilliam, Perliter | Vice President of Accreditation | |
| Zeigler, Karly | Manager, Institutional Compliance | |

TRIC January 2018 Post-Council Minutes

January 2, 2018

Attendance: Karly Zeigler, Michelle Edwards, Perliter Walters-Gilliam, LaToya Boyd, Katie Morrison, Linda Lundberg

Absent: Cathy Kouko

Order of discussion:

- Revisions to report templates
- Revisions to visit memos
- Revisions to motion letter templates
- Revisions to orange sheet

I. Template changes

| Proposed Criteria and Editorial Changes: | |
|--|--|
| 2-2-101 List of Substantive Changes 2-2-109 Increasing or Decreasing the Number of Clock or Credit Hours 2-2-121 Changes to Existing Programs 2-2-151 Non-Substantive Program Changes | No template changes are needed, but these criteria may need to be used in findings if campuses have made program changes without notifying ACICS. |
| Appendix C, Advertising 5. An institution shall not use the words “free” and “guarantee” for advertising or marketing purposes in a manner that is misleading to prospective or current student. A disclosure must be made for services which are funded by third parties that are offered at no cost to students. | Revised criterion in Section 6 template. |
| 3-1-202 Institutional Integrity and Capability. The integrity and capability of an institution is manifested by the professional competence, experience, personal responsibility, and ethical practices demonstrated by all individuals comprising the ownership, control, or management. | Revised criterion in Sections 1-3 template. |
| 3-1-202(a) Remove language regarding distributed enterprise. | Revised criterion in Sections 1-3 template. |
| 3-1-414 Enrollment Agreements. All institutions must use an enrollment agreement for each enrolled student which clearly outlines the financial obligations of both the institution and the student. The agreement must outline all program-related tuition and fees <u>as well as the scheduled month and year of expected graduation</u> , must be signed by the student and the appropriate school representative, and a copy provided to the student. | Revised criterion in Section 4 and added item to 4.09. |
| Appendix K Graduation rate guidelines. | No revisions to the template but remind campuses that guidelines will be in the <i>Memo to the Field</i> and that their CEP graduation rate goals must be in alignment in the future. The CAR will ask for documentation of revised graduation dates in the future. Add to the template for the May/June visit cycle. |
| General suggestions | |
| Make sure that program information on page 2 matches what is in our database. | Run report of programs from Personify and send to the |

| | |
|---|---|
| <p>Possibly combine the second half of 4.12 with 4.13 and revise the wording.</p> | <p>campus prior to the visit. The Section 4 template has been revised to what was used in the January/February 2017 cycle. Much discussion took place regarding the difference between what is asked for in 4.11 and in 4.13. The consensus was to have 4.11 deal with whether those involved in admissions and recruitment activities communicate current and accurate information. Item 4.12 is to be revised to ask only who is responsible for oversight of recruitment activities at the campus, and 4.13 will deal with documentation that demonstrates the campus systematically monitors its recruitment activities for compliance with all applicable standards. Linda will make these revisions. Perliter will provide pre-visit guidance on 4.11.</p> |
| <p>Delete the question regarding documentation for licensure pass rates from the Data Integrity Review in Sections 1-3. Possibly move the licensure pass rate information to page 2. Also remove or reword the two questions regarding how institutions track "On-time Graduation by Cohort."</p> | <p>Putting licensure information on page 2 does not deal with accuracy. Licensure information is checked in the CAR. It was decided to remove the licensure question from the Data Integrity Review section. It was decided to revise 8.01(a) to change "established" to "published." Linda will make the revision. If licensure is required to work in the field, the campus has to include licensure in the CEP, according to Appendix K.</p> |

II. Visit Memos

- a. Revise visit memo addendum. It is suggested to add the information from the addendum to the memo itself. **If anything is missing, add it to the visit memo. It was decided to keep the supplement separate.**
- b. Save copies of pre-visit communications in SharePoint under AID/Documents/Visits/Visit Memos/(Your first name)/(Visit cycle).

III. Motion Letter Templates

- a. Changes regarding institution (main and all branches) – All letters to the main campus with copies to the branch(es), unless a QAM visit to a branch campus for a program(s). Then send letter to the branch campus with a copy to the main campus.
- b. Revise language in non-approval motion letter templates regarding resolved findings to “...of which the institution has ~~satisfied~~ resolved ___ to the Council’s satisfaction...” **If an institution is being placed on compliance warning for the first time, there is no history to include. Linda will revise the template.**
- c. Review all language for accuracy with current *Criteria*.

III. Orange Sheet Templates

- a. Add a cell for the main campus ID code.
- b. Any other revisions needed on the orange sheet templates? **Add back credential level. A suggestion was made to add the committee recommendation to the orange sheet. The consensus was not to add the committee recommendation. The recommendation is captured in the Council discussion.**

IV. Further Discussion

- a. New sample report with additional narratives, DIR summary, occupational associate’s degree program(s) **Wait until next cycle.**
- b. Any changes to editing guides on the website? **Wait until next meeting to discuss.**

TRIC July 2017 Pre-Council Minutes

July 18, 2017

Attendance: Perliter Walters-Gilliam, Jan Chambers, Cathy Kouko, Katie Morrison, Linda Lundberg

Absent: Karly Zeigler, LaToya Boyd

Order of discussion:

- Revisions to report templates
- Post-visit e-mail and visit surveys
- Revisions to motion letter templates

I. Template changes

| Proposed Criteria and Editorial Changes: | |
|---|--|
| 2-2-101 List of Substantive Changes 2-2-109 Increasing or Decreasing the Number of Clock or Credit Hours 2-2-121 Changes to Existing Programs 2-2-151 Non-Substantive Program Changes | No template changes are needed, but these criteria may need to be used in findings if campuses have made program changes without notifying ACICS. |
| Appendix C, Advertising 5. An institution shall not use the words “free” and “guarantee” for advertising or marketing purposes in a manner that is misleading to prospective or current student. A disclosure must be made for services which are funded by third parties that are offered at no cost to students. | Revise Section 6 template if approved as final. Linda will revise according to the effective date. |
| 3-1-202 Institutional Integrity and Capability. The integrity and capability of an institution is manifested by the professional competence, experience, personal responsibility, and ethical practices demonstrated by all individuals comprising the ownership, control, or management. | Revise Sections 1-3 template if approved as final. Linda will revise according to the effective date. |
| 3-1-202(a) Remove language regarding distributed enterprise. | Revise Sections 1-3 template if approved as final. Linda will revise according to the effective date. |
| General suggestions | |
| Make sure that program information on page 2 matches what is in our database. | Coordinators will send the report with programs and program metrics with the visit memo e-mail and ask for documentation of ACICS approval/acknowledgement for any changes in the programs. |

II. Visit Procedures

- a. Post-visit e-mail to campus – **Perliter will update the e-mail and upload it into SharePoint.**

- b. Post-visit survey for campus to complete – Andrea has access to the survey. Perliter will work with her to update the survey and make it available on the website.**
 - c. Include in the visit memo e-mail that the campus will receive an invoice several weeks prior to the visit that must be paid prior to the visit.**

- III. Motion Letter Templates
 - a. Changes regarding institution (main and all branches) – Any changes from last cycle’s formats? Keep the wording. Senior management will consult with Michelle Edwards regarding her expectations for letters and to get her signature block information.**
 - b. Review all language for accuracy with current *Criteria***
 - c. Recommend revisions of any language that is unclear, unnecessary, etc.**

- IV. Further Discussion
 - a. New sample report with additional narratives, DIR summary, occupational associate’s degree program(s). There is no time to prepare a sample report now. Perliter asked Linda to find a sample from the spring or winter cycle that would be a good example. Perliter will protect it and indicate it is confidential and for training purposes only. Linda will ask Andrea to remove the sample report currently on the website.**
 - b. Any changes to editing guides on the website? Jan will update criteria cited in the editing guidelines and give the information to Linda for updating the editing guides.**
 - c. Perliter recommended that we review all procedures, manuals, guidelines, etc. each summer to keep everything current and accurate.**

TRIC March 2017 Pre-Council Minutes

March 28, 2017

Attendance: Karly Zeigler, Perliter Walters-Gilliam, Jan Chambers, Katie Morrison, Linda Lundberg

By Invitation: Cathy Kouko, Niana Moore

Order of discussion:

- Recommended changes to templates
 - Policy items for Council and possible changes to templates and letters
- I. Template changes

| | Notes |
|--|---|
| <p>Proposed Criteria and Editorial Changes:</p> | |
| <p>TITLE II, GENERAL PROCEDURES Chapter 1 Gaining and Maintaining Accreditation 2-1-300 RENEWAL OF ACCREDITATION It is the responsibility of the institution to file an application and remit the appropriate fees for a renewal of accreditation <u>three months prior to the assigned review cycle</u>. This also involves submission of the institution's renewal self-study, with supporting documents. Institutions that have not submitted a renewal self-study at <u>least two months prior to the assigned review cycle</u>, and have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, <u>will be subject to late fees and may be issued a show-cause directive</u>.... 2-1-301 Application. <u>...No substantive changes shall be made to the institution once the application has been submitted, leading up to the campus site visit...</u> 2-1-701 Maximum Length of Grants of Accreditation. The Council determines the grant lengths of each <u>institution</u> that is accredited by ACICS.... 2-1-702 Grant Lengths of Branch Campuses in Multiple Campus Institutions Chapter 2 Institutional Changes 2-2-101 – List of Substantive Changes. (g)a 25 percent or greater <u>change</u> in the number of clock or credit hours awarded for successful completion of a program as described in Standard 2-2-109; 2-2-109 Increasing or Decreasing the Number of Clock or Credit Hours. 2-2-121 Changes to Existing Programs. (a)(i) a 25 percent <u>change</u> in the number of clock or credit hours awarded for successful completion of an existing program 2-2-151 Non-Substantive Program Changes. 2-2-106 – Initiation of Distance Education (Online) or New Instructional Delivery Method. 2-2-503 Termination of Programs. Notification must be made to the Council <u>prior to the start</u> of the teach-out.</p> | <p>Revisions needed to the renewal of accreditation approval letter template when these changes are approved and when they go into effect.</p> <p>Revisions to DE template?</p> |

| | |
|---|--|
| <p>Chapter 3, Council Actions 2-3-230 Show-cause Directive. Take out language allowing campus to request a hearing. Change language to reflect that a show-cause directive is for a campus rather than an institution. Also in: 2-3-231 Result of Show-Cause. 2-3-232 Vacate Show-Cause. 2-3-233 Notification of Show-Cause. 2-3-303 Other Denial Actions Not Affecting Overall Accreditation. 2-3-500 COUNCIL REVIEW PROCEDURES 2-3-501 Hearing or Institutional Review Format 2-3-502 Financial Hearings or Reviews Take out language allowing institution to request a hearing Only when designated by Council Change to review OR hearing, not both Keep transcription as part of fee 2-3-302 Denial of a Renewal of Accreditation or Denial of Reinstatement of Accreditation Following Change of Ownership/Control. 2-3-400 ACCREDITATION WITHDRAWN Add language for withdrawal of a campus from inclusion within an institution’s grant of accreditation. 2-3-401(b) Revocation. ...institution/campus.... 2-3-403 Procedural Guarantees for Withdrawal by Suspension. 2-3-602 Appointment of Members. 2-3-608 Expenses of Appeal Hearing. Keep transcription as part of fee. 2-3-900 DEBARMENT</p> <p>TITLE III, EVALUATION STANDARDS Chapter 1, General Standards Applicable to All Institutions 3-1-202 Institutional Integrity and Capability. The integrity and capability of an institution is manifested....</p> | <p>Revise criterion in templates</p> |
| <p>APPENDIX A BYLAWS ARTICLE II Board of Directors <i>Section 3 – Officers of the Board and Officers of the Council.</i> ARTICLE III Council <i>Section 1 – Composition.</i> ARTICLE VII Appeals Process <i>Section 1 –Review Board of Appeals.</i> APPENDIX B PROCEDURES AND GUIDELINES FOR UNANNOUNCED VISITS Adjust language to be consistent with other visit fees APPENDIX C INSTITUTIONAL PUBLICATIONS REQUIREMENTS ADVERTISING 5. ...A disclosure must be made for services which are funded by third parties that are offered at no cost to students. APPENDIX G GUIDELINES ON DISCLOSURE AND NOTIFICATION Questions regarding international institutions APPENDIX K REQUIREMENTS AND GUIDELINES FOR THE CAMPUS EFFECTIVENESS PLAN (CEP) EVALUATION OF ELEMENTS IN THE CAMPUS EFFECTIVENESS PLAN (CEP) 3. Graduation Rates, APPENDIX L STUDENT ACHIEVEMENT STANDARDS AND CAMPUS</p> | <p>Revise criterion in template and remove 6.15.</p> |

| | |
|--|--|
| ACCOUNTABILITY REPORTS STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS | |
|--|--|

| General suggestions | |
|---|---|
| Recommendation from Anne: Include the same basic information on the cover pages of all reports in a standard format. | Anne will add website URL to all report cover pages and standardize cover pages for all report templates with basic information from the IG/RA report cover page. |
| Some teams complained that there was repetition in the QAV report questions. | Perlitter will review the QAV report template questions. |
| Evaluators' responses to 8.21 in the IG/RA report, doctoral level, ESL, QAM-OS, and QAM-HC templates regarding instructional components listed in 3-1-532 vary widely. | Perlitter will follow up with academics to see what kind of guidance we can provide to evaluators in gathering information to respond to this question. |
| Evaluators found that program directors often cannot provide evidence of comparisons with programs at other institutions to assist in responding to the curriculum question in reports about how the curriculum quantitatively and qualitatively approximates the standards at other institutions offering the same degree program. | It was decided that we do not want to make this a Yes/No question. Linda will remove the direction to ask the program administrator. Some campuses have corporate development of curriculum. It was recommended that coordinators stress to evaluators to read the template questions and the self-study prior to the visit and possibly do some research about similar programs in the area of the campus before the visit. |
| The DIR summary needs revision. Some chairs told Perlitter that they thought, based on instructions sent out regarding the DIR summary, that the team was to verify all reported placements, even those verified in the PVP. | Karly will revise the DIR summary. The team will still verify waivers. The report will note discrepancies found but will not include findings in this section. Perlitter will check the instructions sent out to evaluators to be sure they are clear as to what is to be verified. |

- II. Visit Memos –
 - a. Are any additional revisions needed? There is now a supplement w/information on survey, invoicing, call for comment, PVP.
 - b. Team memo – This memo was updated last cycle to notify evaluators that ACICS covers the expense of the hotel. Some evaluators did not read that and were surprised that they were not to make their own arrangements, and one tried to

change the charge to a personal credit card. Remind evaluators this cycle of the change.

III. Visit Procedures

- a. Any revisions needed to language in notes on page 2 of IG, RA templates regarding programs in teach out, not started yet, under 300 hours?
For programs (not courses) under 300 hours that have an occupational objective, **Linda will create a separate table that can be deleted if not needed.** The table will include the program name; number of contact hours; program length in weeks or days; whether a certificate, diploma, or certificate of completion is awarded upon satisfactory completion of the program; and whether the program prepares the student for licensure or certification. **When this table is completed in a report, Linda will copy the information to an Excel spreadsheet, add the campus ID code, and e-mail the spreadsheet to a program analyst (possibly Shaniqua) for adding to the notes in the Member Center for the campus so there is a record of these programs separate from approved programs.**
- b. Perliter explained that previously coordinators would e-mail the campus within three days of the completion of the visit, thanking the campus for their hospitality, telling them to expect their report within two weeks and to follow up if they do not receive it, and that payment of the visit invoice is due within 10 days of receipt. The e-mail also invited the campus to complete a survey regarding the visit. **Perliter will check with Andrea to see whether the survey is still active. We will ask coordinators to send the e-mail to each campus after their visits this cycle.**
- c. The one issue that holds up reports from being finalized is discrepancies in program names, contact hours, and credits on page 2.
Coordinators will run the report of all programs from Personify and filter for each campus visit that requires page 2 information. It was recommended to add a column for differences the campus wants to report and a column for enrollment. The coordinator will send this spreadsheet to the campus and ask that the campus return it to the coordinator, along with ACICS backup of approval or acknowledgement for any differences reported, prior to the visit.
For initial grants, any discrepancies between what the institution entered in Personify and what is currently being offered should be worked out either at the resource visit or at the time of the initial grant visit. Once any discrepancies have been satisfactorily addressed and the report is completed, Linda will work with Karly or Perliter to make sure that program information in the initial grant visit report and in Personify match.
For other reports, the coordinator will check the backup for any differences reported by campuses. If the backup documentation shows Personify was not updated correctly, staff will make necessary updates and enter a note in the Member Center to document the change.
Perliter will bring this issue up in the pre-visit meeting.

IV. Letter Templates (FYI)

- a. Changes to language and action on letters . Linda has revised the letter templates in the Commissioner Portal so that the subject line comes before the salutation. Those who should be copied on letters should be correct.
- b. When the change to grant length policy is decided, the approval letters will need to be revised. Also, letters to branch campuses will also be sent to the main campus.

V. IRC:

VI. Further Discussion

- a. Revisions to canned language for motion letters
Perliter will follow up with Andrea to see whether she has completed the findings summary for the winter cycle. We can use that summary to see what findings were issued most often and to see whether there are any findings not addressed by the canned language. It was agreed that with the current explanations included in letters, we do not need to develop extensive suggested language for the letters; but basics that the Council would expect to review to resolve a finding would be helpful.
- b. New branch campuses and CAR—Yes, new branches must submit a CAR.
- c. There will be discussion at this Council as to how to deal with different grant lengths:

One option is to reduce the grant length of some branches so that they are in line with the main campus's grant length. This option would probably not be well received by the campuses.

Another option is to grant an extension of grant length to a main that has an earlier grant expiration date than one or more of its branch campuses.

Another option is to phase the policy in and grant the main whatever grant length is appropriate after their renewal of accreditation visit and then align each branch with the main's grant expiration after the branch's renewal of accreditation visit.

- d. The current procedure of asking campuses to upload an acknowledgement of receipt of a visit report into their application was discussed. Linda has to periodically go into applications to see whether an acknowledgement has been uploaded and whether it has comments or concerns that need to be addressed. It was decided that if we return to the practice of having campuses complete a visit survey after the visit has concluded, and if we receive evidence that the report has been delivered to the campus, we do not need to have an acknowledgement of receipt of report uploaded into applications.
Linda will revise the cover letters for reports to remove the requirement for campuses to upload a separate acknowledgement of receipt into their applications. When she e-mails reports, she will request both a delivery and read receipt.

TRIC April 2017 Post-Council Minutes

April 25, 2017

Attendance: Karly Zeigler, Perliter Walters-Gilliam, Jan Chambers, Maurice Wadlington, Katie Morrison, Anne Bennett, Linda Lundberg

Order of discussion:

- Revisions to report templates
- Post-visit e-mail and visit surveys
- Revisions to motion letter templates

I. Template changes

| General suggestions | |
|--|--|
| Standardize format and information needed on report cover pages. Include campus website URL. | Anne has completed the revisions. The committee approved the revisions. |
| Set up a separate table that can be deleted if not needed for programs under 300 hours that have occupational objectives. | Linda has created the table and included it in revised templates. Linda will move the Credential Awarded columns to the far left of the table next to Program. |
| Provide guidance to evaluators as to what is expected in responding to the question regarding instructional components listed in 3-1-532. | Perlitter has received recommendations from academics for this guidance. Perlitter will include this information in the evaluator newsletter and the evaluator training manual. LaToya is doing the visits this cycle. She will go over this information with evaluators prior to visits. |
| Remove the direction for evaluators to ask program administrators for information about how program curriculum qualitatively and quantitatively approximates that of similar institutions offering the same degree. Coordinators will stress to evaluators to read the template questions and the self-study and possibly do some research about similar program in the area of the campus prior to the visit. | Linda has revised the templates to remove this direction. |
| Revise the DIR summary. Teams will still verify waivers. Reports will note discrepancies found but will not include findings in this section. | Karly is revising the DIR summary. Karly distributed a draft of the revised DIR summary. The committee recommended moving the placement waivers information below retention and inserting a heading for Retention Verification. Add Appendix L to the finding sections. The coordinator will consult with the SR on these sections. The committee recommended that the Placement Verification |

| | |
|--|--|
| | <p>Program (PVP) section include the total placements submitted, the response rate, and the percent verified. Revise the question to summarize any anomalies or significant observations.... In the Licensure Pass Rates section, change 2016 CAR to most recent CAR. In the On-Time Graduation by Cohort section, revise question 2 from “Does the campus document leave of absences and cohort transfers appropriately?” to “How does the campus document leaves of absence and cohort transfers?” LaToya will encourage campuses to go back and update information.</p> |
| <p>Make sure that program information on page 2 matches what is in our database.</p> | <p>Perliter will discuss this issue at the pre-travel meeting. This cycle LaToya will run the program information from Personify for campus visits.</p> |

II. Visit Procedures

- a. Post-visit e-mail to campus
- b. Post-visit survey for campus to complete

III. Motion Letter Templates

- a. Changes regarding institution (main and all branches)
 - 1. **If a letter applies to the institution, address to the main, list the main and all the branches and learning sites before the salutation, and copy the branches and learning sites. If a letter applies only to a branch (such as a QAM-OS), address to the branch and copy the main. This format could change if the proposed revisions to 2-1-701 and 2-1-702 regarding grant lengths are approved at the August Council as proposed.**
- b. Review all language for accuracy with current *Criteria*
- c. Recommend revisions of any language that is unclear, unnecessary, etc.
 - 1. **It was recommended to change the wording of the first paragraph of the compliance warning letter to Roger’s revised wording.**
 - 2. **In deferral, compliance warning, and show-cause letters, which will be to an institution, add a line in the first paragraph for any campus that has resolved all of the findings for that campus.**
- d. Recommendations for the template format:
 - 1. **Set the date for automatic update. Linda will change when she is preparing the letter for sending.**

2. **Make sure every letter has a VIA E-MAIL AND _____ (other type of delivery, or E-MAIL ONLY) two lines below the date. Insert the campus e-mail address in italics flush with the right margin on this line.**
2. **Move the list of the main campus, branch campuses, and learning sites to above the salutation.**
3. **In letters that say an institution must submit responses electronically, change DATE in the template to Month, day, year.**
4. **For multiple-page letters, use Page _ of _ in the header.**

Anne provided other editorial recommendations for the templates. Linda will revise the letter templates.

IV. Further Discussion

- a. Revisions to canned language for motion letters—We want to rely less on canned language. Identify what findings are issued most often and see whether they are addressed in current canned language. Just provide language for the basic information Council will expect to review for those findings.
- b. **As part of motion letter day, look at the orange sheet and the responses for each letter. Be sure all documentation in responses from institutions was considered in the IRC response for findings not resolved.**



Accrediting Council for
Independent Colleges & Schools

RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS

Lincoln University
401 15th Street
Oakland, CA 94612
ACICS ID Code: 00010193

Dr. Mikhail Brodsky, President (president@lincolnuca.edu)
(acics@lincolnuca.edu)
www.lincolnuca.edu

October 17–18, 2019

| | | | |
|----------------------|--------------------------------------|--|----------------------|
| Ms. Kathryn Sellers | Chair | Online Professor, Ameritech | St. Augustine, FL |
| Mr. Edgar Krissler | Student Relations Specialist | Campus President (Former), Krissler Business Institute | Newburgh, NY |
| Dr. David Teneyuca | Educational Activities Specialist | Assistant Professor, University of Texas at San Antonio | San Antonio, TX |
| Ms. Mary Gail Lowery | Business Specialist | Education Specialist (Former), Alabama Department of Education | Tuscaloosa, TN |
| Dr. Gary Maluf | Diagnostic Imaging | Director of Medical Laboratory and Imaging Department, Benson Hospital | Sahuarita, AZ |
| Ms. Karly Zeigler | Staff Representative | ACICS | Washington, DC |

Summary of Data Integrity Review

Retention Verification

1. Was the team able to verify the retention waivers and retention rate for the campus and for each program, as reported on the Campus Accountability Report (CAR) last submitted to the Council?

Yes No Not Applicable

There were no withdrawal waivers reported on the 2018 CAR.

Placement Waivers

2. Was the team able to verify the graduates reported as unavailable for placement on the campus's most recent CAR?

Yes No Not Applicable

If *No*, insert "Section 3-1-203 and Appendix L" in parentheses and explain:

(Section 3-1-203 and Appendix L): Back-up documentation is not available to verify those reported as unavailable for placement on the 2018 CAR. There were 134 graduates listed as unavailable for placement, the majority due to visa restrictions. Additionally, there were some inappropriately classified as unavailable due to continuing education for "ARDMS Exam Preparation Study." These were explained as graduates awaiting a certification exam. However, this is not a requirement for employment, and the graduates are not enrolled full-time in an education program that is longer than 300 hours. There was no back-up documentation provided to substantiate any of the classifications.

On-Time Graduation by Cohort

1. Describe the tracking system utilized by the campus for students' scheduled graduation dates.

Upon enrolling, an on-time graduation date of 150 percent of the program length is calculated by the Learning Management System (LMS) for the student and is maintained as they progress through their program. This is monitored every quarter through SAP monitoring to ensure a student does not exceed the 150 percent timeframe. The final graduation date is set when the student is in their last semester.

2. How does the campus document leaves of absence and cohort transfers?

As mentioned above, the institution's LMS tracks student progress. Leaves of absence are given for up to one semester, for those that submit a written request. A cohort transfer is completed when the student is in their final semester.



RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS
EASTWICK COLLEGE
10 South Franklin Turnpike
Ramsey, NJ 07446
ACICS ID Code: 00010388

Mr. Thomas M. Eastwick, President (tomeastwick@aol.com)
(acicsramsey@eastwick.edu)
<http://www.eastwickcollege.edu>

August 26–27, 2019

| | | | |
|--------------------------|--|--|--------------------|
| Ms. Pamela Bennett | Chair/Library | Director of Library Services/ Campus Compliance (Former), Dallas Nursing Institute | Dallas, TX |
| Ms. Susan Mago | Student Relations Specialist | Regional Director (Former), Minnesota School of Business - Blaine | East Bethel, MN |
| Mr. Brian Trewartha | Educational Activities/Medical Assisting/and Health Science Specialist | Faculty, Minnesota School of Business | Elk River, MN |
| Ms. Louise Wilcox | Diagnostic Cardiovascular Sonography Specialist | Campus President (Former), American Institute of College of Health Professions | Niantic, CT |
| Ms. Petal Williams | Nursing (LPN to RN Bridge) Specialist | RN Charge Nurse, Bayfront Health | North Port, FL |
| Ms. Liliya Tishchenko | Diagnostic Medical Sonography Specialist | MD, Dean, Allied Health Sciences, Program Director, DMS, PHT, Northwest Suburban College | Elmhurst, IL |
| Mr. Andre McDuffie | Staff Representative | ACICS | Washington, DC |
| Mr. David Moser | Staff Observer | ACICS | Washington, DC |

Summary of Data Integrity Review

Retention Verification

1. Was the team able to verify the retention waivers and retention rate for the campus and for each program, as reported on the Campus Accountability Report (CAR) last submitted to the Council?

Yes No Not Applicable

If *No*, insert “Section 3-1-203 & Appendix L” in parentheses and explain:

(Section 3-1-203 & Appendix L): The retention waiver for one student could not be verified. The team was unable to confirm the retention waiver for student [REDACTED] as no documentation was evidenced to support enrollment in an institution with common ownership.

Placement Waivers

2. Was the team able to verify the graduates reported as unavailable for placement on the campus’s most recent CAR?

Yes No Not Applicable

If *No*, insert “Section 3-1-203 & Appendix L” in parentheses and explain:

(Section 3-1-203 & Appendix L): Placement waivers for some graduates could not be verified. The team was unable to confirm the following placement waivers for the 2018 CAR:

- [REDACTED] submitted a placement waiver for continuing education from the bachelor of science degree in diagnostic cardiovascular sonography program for Jersey tractor trailer training and evidenced him discontinuing his job search as he is now employed in his new career path as a truck driver; however, Mr. [REDACTED] was not identified as using a placement waiver on the 2018 CAR; therefore, the team is unable to confirm the accuracy of the 2018 CAR.

[REDACTED] submitted a placement waiver for continuing education at Mahwah Resource Center for EMT Training; however, Ms. [REDACTED] is evidenced on the CAR as using a placement waiver for pregnancy, death, or other health-related situations.

- [REDACTED] submitted a placement waiver for continuing education for the licensed practical nursing program; however, the 2018 CAR identifies her as using a waiver for pregnancy, death, or other health-related situations.

On-Time Graduation by Cohort

1. Describe the tracking system utilized by the campus for students’ scheduled graduation dates.

DiamonD is the software management system utilized by Eastwick College in Ramsey, New Jersey. DiamonD access is separated by departments. Therefore, when a prospective student enrolls in a new program, the admissions department manually enters the student's data and personal information into the DiamonD software system. Then, prior to the student officially attending the institution, the student's information is moved from the admissions department to the registrar's department of DiamonD. At that point the registrar can begin to track and monitor the student's account and graduation dates.

2. How does the campus document leaves of absence and cohort transfers?

The campus documents leaves of absences by having students submit a form for mitigating circumstances. This form can be obtained on the institution's web site, and students must submit this form within the first two weeks of the start of the quarter. If the student's request is approved, the student is notified of their approval, provided a return date, and expected to complete an additional form evidencing their intent to return at the conclusion of their leave of absence. These forms are stored in the registrar's office and within the DiamonD system, under the student's individual account.

In regard to cohort transfers, students primarily transfer cohorts when they must retake a course and fall out of their cohort's course sequencing, resulting in a new expected graduation date. Students are notified of their cohort transfer by signing a document that states they are repeating a course and as a result will be in a new cohort.



RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS
NATIONAL LATINO EDUCATION INSTITUTE
2011 West Pershing Road
Chicago, IL 60609
ACICS ID Code: 00011105

Dr. Theresa Jones, Program Director/On-site Administrator (tjones@nlei.org)
(nlei@nlei.org)
<http://www.nlei.org>

September 23–24, 2019

| | | | |
|--------------------------|--|--|----------------------|
| Ms. Pamela Bennett | Chair / Library | Director of Library Services/ Campus Compliance (Former), Dallas Nursing Institute | Dallas, TX |
| Ms. Patricia “Pan” Fuchs | Student Relations Specialist | Sr. Director of Accreditation and Licensing (Former), Zenith Education | Beverly Hills, CA |
| Ms. Lisa Bynoe-Plaskett | Educational Activities / Library / Program Specialist | Online Faculty (Former), Argosy University | Charlotte, NC |
| Mr. Andre McDuffie | Staff Representative | ACICS | Washington, DC |

to meet briefly with the team on the second day of the visit to discuss NLEI and ACICS. The members were very positive about the future of NLEI and its continued relationship with ACICS. The board members also offered any assistance they might be able to provide ACICS in their dealings with CHEA and/or the Department of Education.

The campus has no learning sites.

Summary of Data Integrity Review

Retention Verification

1. Was the team able to verify the retention waivers and retention rate for the campus and for each program, as reported on the Campus Accountability Report (CAR) last submitted to the Council?

Yes No Not Applicable

Placement Waivers

2. Was the team able to verify the graduates reported as unavailable for placement on the campus's most recent CAR?

Yes No Not Applicable

On-Time Graduation by Cohort

1. Describe the tracking system utilized by the campus for students' scheduled graduation dates.

The institution utilizes Microsoft Excel to track students' scheduled graduation dates. The institution creates individual grade report spreadsheets based on cohorts. Only Dr. [REDACTED] on-site administrator, and Ms. [REDACTED] records coordinator, have access to these spreadsheets to ensure records are not manipulated.

2. How does the campus document leaves of absence and cohort transfers?

The campus documents leaves of absence by having students inform their instructor and Dr. [REDACTED] in writing of their mitigating circumstances, indicating how long the student will need to be absent, and including appropriate documentation to confirm the need for the leave of absence. Dr. [REDACTED] is the sole approver of all leaves of absence at the institution. If a student is approved for a leave of absence, then the student's file is updated accordingly.

In regard to cohort transfers, the institution documents this process by having students sign an academic advisement form to evidence that the students are aware that they will have to retake a course due to poor grades, and as a result will no longer be able to graduate when initially anticipated. By signing the academic advisement form, students evidence their awareness of their cohort transfer and are notified as to when they will be able to retake the required course. This document is then stored in the student's individual file.



Accrediting Council for
Independent Colleges & Schools

RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS

GWINNETT COLLEGE
4230 Highway 29, Suite 11
Lilburn, GA 30047
ACICS ID Code: 00011909

Ms. Lisa McLario, Campus President (lmclario@gwinnettcollege.edu)
(admin@gwinnettcollege.edu)

<https://www.gwinnettcollege.edu/locations/lilburn/>

October 8–9, 2019

| | | | |
|------------------------|--|---|-------------------------|
| Dr. Stephen Calabro | Chair | President (Former), Southwest Florida College | Mount Pleasant, SC |
| Ms. Ruby 'Elaine' Cue | Student Relations Specialist | Campus President (Former), Brown Mackie College | Myrtle Beach, SC |
| Dr. John Mago | Educational Activities / Library / and Accounting Specialist | Professor / Department Chair, Anoka Ramsey Community College | East Bethel, MN |
| Ms. Susan Mago | Computer Operations / Business / and Administrative Assisting Specialist | Regional Director (Former), Minnesota School of Business- Blaine | East Bethel, MN |
| Ms. Laura Alfano | Paralegal Studies Specialist | Vice President of Curriculum, Education Futures Group / Vista College | Warrior, AL |
| Dr. Steve Preddie | Massage Therapy Specialist | Dr. Preddie's Health and Wellness Ministries | Lauderdale Lakes, FL |
| Ms. Catherine Borowski | Medical Office Administration and Medical Assisting Specialist | Associate Campus Director – Director of Education (Former), McCann School of Business and Technology | Wilkes Barre, PA |
| Mr. Andre McDuffie | Staff Representative | ACICS | Washington, DC |

Summary of Data Integrity Review

Retention Verification

1. Was the team able to verify the retention waivers and retention rate for the campus and for each program, as reported on the Campus Accountability Report (CAR) last submitted to the Council?

Yes No Not Applicable

Placement Waivers

2. Was the team able to verify the graduates reported as unavailable for placement on the campus's most recent CAR?

Yes No Not Applicable

If *No*, insert "Section 3-1-203 & Appendix L" in parentheses and explain:

(Section 3-1-203 and Appendix L): All placement waivers could not be verified. The team was unable to confirm the following placement waivers:

- Ms. [REDACTED] placement waiver for the accounting diploma program could not be verified as none of the provided documentation evidenced enrollment into an academic program.
- [REDACTED] placement waiver for the business associate program could not be verified as none of the provided documentation evidenced enrollment into an academic program.
- [REDACTED] placement waiver for the business associate program could not be verified as none of the provided documentation evidenced enrollment into an academic program.

On-Time Graduation by Cohort

1. Describe the tracking system utilized by the campus for students' scheduled graduation dates.

The campus tracks its student's scheduled graduation dates through their accounts receivable system entitled, Gwinnett College Student Account Receivable System. This proprietary system identifies each student's scheduled graduation date. If students leave the school and return, their expected graduation date is updated within this system. Additionally, the campus utilizes Excel spreadsheets, organized by program, to track student completion rates of the required courses within their selected program.

2. How does the campus document leave of absence and cohort transfers?

The campus does not offer leaves of absence in the traditional sense. When students need to leave the campus due to mitigating circumstances, they inform the campus. The campus then interviews the student to understand his or her need for a leave of absence. At this time, the school assists the student in withdrawing from the program. The student and campus complete the "student control form," which identifies the student's need to withdraw. This completed form, is then provided to the registrar, who processes the required paperwork and drops the student from the program. A student who returns to the campus at a later date completes the appropriate paperwork to re-enroll in his or her program.



RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS
PIONEER PACIFIC COLLEGE
4145 SW Watson
Beaverton, OR 97005
ACICS ID Code: 00012651

Dr. Kim Schmaltz, On-site Administrator (Kim.Schmaltz@pioneerpacific.edu)
(wil-acics@pioneerpacific.edu)
<https://www.pioneerpacific.edu>

September 3–4, 2019

| | | | |
|-----------------------------|--|--|--------------------------|
| Dr. Andrea Olson | Chair | VP of Strategic Planning, University of North America | Fairfax, VA |
| Ms. Ruby 'Elaine' Cue | Student Relations Specialist | Campus President (Former), Brown Mackie College | Myrtle Beach, SC |
| Ms. Lisa Bynoe- Plaskett | Educational Activities / Library/ Management / Healthcare Administration / Distance Education Specialist | Online Professor (Former), Argosy University | Charlotte, NC |
| Dr. Rafael Camejo | Practical Nurse Specialist | Associate Professor, Miami Regional University | Miami, FL |
| Mr. Erika O'Quinn | Legal Assistant / Paralegal Specialist | Adjunct Faculty, Ocean County College | Atlanta, GA |
| Ms. Terri Hock | Medical Specialist | Director of Student Affairs (Former), Allied Business Schools | Fort Walton Beach, FL |
| Mr. Andre McDuffie | Staff Representative | ACICS | Washington, DC |

Summary of Data Integrity Review

Retention Verification

1. Was the team able to verify the retention waivers and retention rate for the campus and for each program, as reported on the Campus Accountability Report (CAR) last submitted to the Council?

Yes No Not Applicable

Placement Waivers

2. Was the team able to verify the graduates reported as unavailable for placement on the campus's most recent CAR?

Yes No Not Applicable

On-Time Graduation by Cohort

1. Describe the tracking system utilized by the campus for students' scheduled graduation dates.

PPC-Beaverton utilizes the CampusNexus software tracking system to track students' scheduled graduation dates. This system allows the registrar access to all pertinent information regarding a student's enrollment and application.

2. How does the campus document leaves of absence and cohort transfers?

The campus documents leaves of absence by having interested students follow a specific protocol. As evidenced in the addendum of the institution's catalog:

A leave of absence is a temporary interruption in a student's program of study. A leave of absence will be authorized for the following reasons only:

- Students who complete their externship and must wait until the next term is available to resume coursework
- Students transferring between campuses required to wait for the appropriate entry point
- Students waiting for their externship to begin
- Students waiting for a module to begin
- Students who have completed a module and are waiting for the next term to begin

A leave of absence may only be requested for students who have completed the required coursework in the previous term or module and have been awarded a letter grade other than I = Incomplete.

A leave of absence may be approved if all of the following are met:

- Students must request the leave of absence in writing and in advance
- Students must meet with a financial aid department representative prior to approval
- There is a reasonable expectation that the student will return
- The student's program director approves the leave of absence
- The student's reason for requesting a leave of absence is one of the five approved reasons above

The maximum timeframe for a leave of absence is one term. Students must be making satisfactory academic progress at the time of their request. A student who fails to return from a leave of absence will have a withdrawal date of their last date of attendance and must formally re-apply for admission. Any student who requests a leave of absence and does not qualify for leave of absence status will be notified. The approval or denial will be evidenced in the student's physical file and within the CampusNexus system as well.

If a student fails a course and is unable to retake the course without extending their graduation date, then the student would need to transfer cohorts. This process is documented by having the student complete a "student change notification" form, which would evidence the student's new graduation date. This document is stored in the student's physical file and within CampusNexus.

1. MISSION

1.01 What is the mission statement of the institution?

The mission statement as published on page 2 of the current catalog is as follows: "Pioneer Pacific College is uncompromisingly dedicated to helping people improve their lives through high-quality, college level career education."

1.02 Does the campus have an appropriate mission statement with a set of supporting objectives devoted substantially to career-related education?

Yes No

1.03 Are the objectives reasonable for the following:

(a) The programs of instruction?

Yes No

(b) The modes of delivery?

Yes No

(c) The facilities of the campus?

Yes No

1.04 Are the mission statement and supporting objectives appropriately disclosed in the campus catalog and in other publications that are readily available to the public?

Yes No

1.05 Describe how the campus demonstrates its commitment to successful implementation of its mission.

At the time of the visit, documents and materials provided by the institution, and responses to interviews and observations conducted by the team, evidenced that qualified and experienced staff and faculty



RENEWAL OF ACCREDITATION VISIT REPORT

CAMPUS

BETHESDA COLLEGE OF HEALTH SCIENCES

3800 S. Congress Avenue, Suite 9
 Boynton Beach, FL 33426
 ACICS ID Code: 00232604

Ms. Amanda Murphy, Dean (AmandaKM@BaptistHealth.net)
 (VivianLo@baptisthealth.net)
www.bethesdacollege.net

LEARNING SITE

Bethesda College of Health Sciences (Bethesda Hospital East)

2815 South Seacrest Blvd
 Boynton Beach, FL 33435
 ACICS ID Code: 00269678

September 12-13, 2019

| | | | |
|----------------------------------|--------------------------------------|---|-------------------|
| Mr. Edgar Krissler | Chair | President (Former), Krissler Business Institute | Newburgh, NY |
| Ms. Pan Fuchs | Student Relations Specialist | Senior Director, Accreditation and Licensing (Former), Zenith Education Group | Beverly Hills, CA |
| Ms. Andrea Olson | Educational Activities Specialist | Vice President of Strategic Planning, University of North America | Fairfax, VA |
| Ms. Nancy Wright | Nurse Specialist | Registered Nurse | Helena, AL |
| Mr. Andre McDuffie | Staff Representative | ACICS | Washington, DC |
| Ms. Perliter Walters- Gilliam | Staff Observer | ACICS | Washington, DC |

Summary of Data Integrity Review

Retention Verification

1. Was the team able to verify the retention waivers and retention rate for the campus and for each program, as reported on the Campus Accountability Report (CAR) last submitted to the Council?

Yes No Not Applicable

Placement Waivers

2. Was the team able to verify the graduates reported as unavailable for placement on the campus's most recent CAR?

Yes No Not Applicable

On-Time Graduation by Cohort

1. Describe the tracking system utilized by the campus for students' scheduled graduation dates.

The institution utilizes Orbund to track students' scheduled graduation dates. This software management system allows the institution to monitor and manage student records and cohort transfers.

2. How does the campus document leaves of absence and cohort transfers?

As evidenced on page 23 of the institution's catalog and confirmed in an interview with Ms. [REDACTED] administrative assistant, students may request a leave of absence of up to one year, through the dean, for mitigating circumstances or deployment to active military service. Extensions may occur based on the individual situations; however, the student would essentially withdraw from the program and upon re-entry, would verify all program pre-admission requirements. Documentation is maintained in the student's individual files. The team notes that the institution does not participate in Federal Financial Aid, as the regulation would restrict the leave of absence time period to six months.

As regards cohort transfers, the programs are offered in a fixed sequence and can only be taken in that order. If a student fails a course, the student will have to wait a year, as courses are only offered once a year. This would inevitably cause the student to transfer cohorts, and this is evidenced and documented within the Orbund tracking system.

Judee A. Timm, Ph.D.

EDUCATION

Ph.D., Southern Illinois University, Carbondale, IL; MBA, Golden Gate University, San Francisco, CA; M.A., Michigan State University, East Lansing, MI; B.S., Southern Illinois University, Carbondale, IL

CURRENT POSITION

Business/International Business Professor, Coordinator of Distance Education (Emeritus). Monterey Peninsula College, Business and Technology Division, Monterey, CA 93940.

Educational Consultant/Reviewer. Specializing in educational administration, career/business education, teacher training, online instruction, and professional development.

United States Vice President/International Executive Committee Member. Representing the U.S. Chapter of the International Society for Business Education (SIEC-ISBE).

SIEC-ISBE Newsletter Editor. Serving as international editor for the quarterly publication of the SIEC-ISBE Newsletter.

PROFESSIONAL AFFILIATIONS:

International Society for Business Education. Held numerous leadership positions. Currently serving as US Vice President on the SIEC/ISBE international board.

National Education Association, Content Quality Review Board. Charged with reviewing and beta testing online professional development courses offered or recommended by the National Education Association.

Accrediting Council for Independent Colleges and Schools. Serve as accreditation program reviewer and team chair on multiple visits throughout the US, Canada, and Europe..

National Business Education Association. Reviewer and writer for multiple, peer reviewed yearbooks focusing on emerging topics in business/career education.

Association of Research in Business Education (Formerly Delta Pi Epsilon), Journal of Applied Research for Business Instruction and The Journal for Research in Business Education. Reviewer of current research articles in business education.

Judee A. Timm, Ph.D.

Monterey County Civil Grand Jury. Charged with conducting and reporting on investigations of public offices in Monterey County. Chaired the Education Committee.

PROFESSIONAL HIGHLIGHTS

President, International Society for Business Education. (2009 – 2010); President Elect (2008-2009); Past President (2010-2011); U.S. Vice President on SIEC board (2015-2017).

Visiting Professor in International Management. (January 2010). AGH University of Science and Technology, Krakow, Poland.

International Business Section Editor. (2005 – 2007; 2010 – 2011). *Business Education Forum*, sponsored by the National Business Education Association.

Co-Founder and Editor. (2001-2004). *Journal of Global Business Education*, International Society of Business Education.

Editor. (2000-2009). *Case Studies in Business Education*, sponsored by the California Statewide Committee for Business Education,

NBEA Standards Task Force on International Business. (2007, 2012).

California Commission on Teacher Credentialing, Business Standard Setting Panel. (2005).

Policies Commission for Business and Economic Education, National Business Education Association. (1999); Policy Development Chair. (2000).

Instructional Development Projects:

“Teaching in Action” Training Videos for Community College Educators Series I – Active Teaching and Learning, (2008); Series II – Online Teaching and Learning (2009), Business Discipline/Industry Collaborative for Business Education Grant, July 1, 2007 – June 30, 2008; July 1, 2008 – June 30, 2009.

“Multiculturalism in Corporate America.” New course developed through the business division to be offered to meet the intercultural general education and international business program requirements. Project was funded by a Vocational Education Minigrant.

Project Coordinator, “Performance Accountability White Paper” for Teachers, Not Trainers Statewide Business Discipline/Industry Collaborative for Business Education Grant, July 1, 2001 – June 30, 2002.

Judee A. Timm, Ph.D.

Project Editor. Statewide Special Project Collaborative in Business Education grant, July 1, 2001- June 30, 2002.

ADMINISTRATIVE EXPERIENCE

International Executive Committee Member. Serves as U.S. Vice President on the international board of the International Society for Business Education (SIEC-ISBE).

Team Chair. School accreditation visits conducted through the Accrediting Council for Independent Colleges and Schools.

Faculty Coordinator of Distance Education, Monterey Peninsula College.

Department Chair, General Business Program, Monterey Peninsula College.

Executive Committee Member, VTEA Business/Industry Collaborative in Business/Computer Science Education Grant.

Division Chair, Business and Technology Division, Monterey Peninsula College.

Academic Senate President. Monterey Peninsula College.

Investigative Chair for Education. Monterey County Civil Grand Jury.

AWARDS

Academic Excellence Award to participate in the Faculty Development in International Business Program in Bangalore and Mumbai, India, January, 2012.

CIBER Faculty Scholarship to attend the Faculty Development in International Business Program in Singapore and Malaysia, January, 2011. Awarded by UCLA, USC, and San Diego State CIBER programs.

Academic Excellence Award to participate in the China Familiarization Seminar, Beijing and Shanghai, China, November 2005.

Academic Excellence Awards to present at three SIEC/ISBE international conferences in Sweden, Poland, and Ireland. Monterey Peninsula College Foundation, 2003, 2004, 2008.

Awarded CIBER Faculty Scholarship to attend the Asia/Pacific Outlook, Los Angeles, CA, March 1992; March 2002

Judee A. Timm, Ph.D.

SELECTED PROFESSIONAL PUBLICATIONS

Timm, J.A. and Monterey County Civil Grand Jury. (2016). Education: A “No Excuses” Approach to English Language Learning in Monterey County. Served as chair of this published report. Posted at <http://www.co.monterey.ca.us/home/showdocument?id=1087>

Timm, J.A. (2011). India excursion blog. Posted at <http://jtimmm2.tumblr.com>

Timm, J.A. (2011). Singapore and Malaysia excursion blog. Posted at <http://jtimmm.tumblr.com>

Timm, J.A. (2011). Basic business courses. *Online Business Education 2011 Yearbook*. National Business Education Association, 124-136.

Timm, J.A. (2009). Teaching in action video series II – A focus on online teaching and learning. *Business Discipline/Industry Collaborative for Business Education Grant Deliverable*. http://www.calbusinessed.org/BESAC_Deliverables_2009/Teaching_in_Action/TIA_Introduction/TIA

Timm, J.A. (2009). The role of government. *Economics & Personal Finance Education 2009 Yearbook*. National Business Education Association, 57-71.

Timm, J.A. (2008). Teaching in action video series I – A focus on active teaching and learning strategies. *Business Discipline/Industry Collaborative for Business Education Grant Deliverable*. http://www.calbusinessed.org/teaching_in_action.html

Timm, J.A. and Mikkelsen, J. (2008). Global vision and local focus of accounting skills in the 21st century. *Journal for Global Business Education*, 29-40.

Timm, J. A., Olson-Sutton, J., Burns, J., Roseland, D. (2007). *International Business: National Standards for Business Education*, 99-113.

Timm, J.A., Mikkelsen, J. and Castillo, L. (2005, June). *Marketing Toolkit for Dynamic and Successful Student Leadership Organizations*. Project and paper supported by VTEA Discipline/Industry Collaborative for Business Education CCCCO Grant #04-0159.

Timm, J.A. (Editor). (2005-2009). *Case Studies in Business/Technical Education*. Sponsored by the California Business Education Statewide Advisory Committee.

Timm, J.A. (2007, October). Achieving excellence in business education. *International Conference Proceedings: Transforming Business & Management for Growth & Development*, Kingston, Jamaica.

Timm, J. A. (2007, May). Turn your course upside down! *Case Studies in Business/Technical Education*, 3-5.

Judee A. Timm, Ph.D.

Timm, J.A. (2005, December). Preparing students for the next employment revolution – Incorporating new management practices in business/CIS instruction. *Business Education Forum*, 55-59. Project supported by VTEA Discipline/Industry Collaborative for Business Education.

Timm, J.A. (2003, February). Cultural sensitivity: The key to teaching global business ethics. *Business Education Forum*, 45-47.

Timm, J.A., (Co-editor). (2000-2004). *Journal for Global Business Education*, Sponsored by the Society for International Business Education.

Timm, J.A. (2002). International business online. *Technology, Methodology, and Business Education 2002 Yearbook*. National Business Education Association, 116-130.

Timm, J.A. Teaching international business. *Instructional Excellence for Business/CIS Education Website*. <http://www.calbusinessed.org/docs/IntBusIP8-23.doc>

Selected Presentations:

Business Issues and Ethics – Creating a Vibrant Online Learning Experience.

Presentation give at the SIEC-ISBE 82nd International Conference, Albury, Australia, July 20, 2010.

Tricks of the Trade for Effective Online Teaching. Presentation given at the California Business Education Conference, Riverside, California, November 7, 2009.

Preparing for the Virtual, Global, and Green Business Environment. Presentation given at the International Society for Business Education Conference, Colchester, England, August 6, 2009.

Teaching in Action -- The Challenge of Discovery Learning. Presentation given at the Asilomar Leadership Conference in Business/Technical Education, March 2008.

Self-Leadership in Business and Technical Education. Presentation given at the CCCAOE Conference, Sacramento, CA, March 13, 2008.

New Learning for a New World: Methods and Strategies to Meet the Challenges of 21st Century Business Careers. Presentation given at the International Society for Business Education Conference, Vienna, Austria, August 2, 2007.

Are Your Students Prepared to Tackle Globalization? Presentation given at the NBEA Conference, New York, New York, April 5, 2007.

Judee A. Timm, Ph.D.

Achieving Excellence in Business Education. Presentation given at the International Conference on Transforming Business & Management for Growth & Development, Kingston, Jamaica, October 20, 2006.

Reflections on China: Implications for Teaching and Learning in Business. Presentation given at the International Society for Business Education Conference, Torshavn, Faroe Islands, July 28, 2006.

Multiculturalism in Corporate America: A New General Education Experience. Presentation given at the CCCAOE Conference, Sacramento, CA, March 3, 2005.

FULL COUNCIL MEETING MINUTES – FEBRUARY 2019

Chair Bennett called the meeting to order at 9:03 AM on February 19, 2019 and welcomed the group.

...

2. BOARD OF ETHICS

Presented By: Edwards

ISSUE/OBJECTIVE: To update the purpose and authority of the Board of Ethics as created in 2016. The intent in the creation of this board committee has changed in the last two years. The board was originally created to provide for review of perceived or actual conflicts of interest in regard to commissioners/directors. In the past two years, commissioners/directors have resigned at the onset of any possible conflict of interest, negating the need to convene the Board of Ethics, however, the expansion of the role and responsibility of this committee is needed.

CRITERIA:

BYLAWS, ARTICLE V, Committees

Section 2–Standing Committees of the Board of Directors. There shall be the following standing committees of the Board:

~~*Board of Ethics*~~*Ethics Review Board.* The ~~Board of Ethics~~Ethics Review Board shall consist of ~~three-four~~ individuals selected by ~~the Board~~ACICS consisting of two independent, public members, ~~and~~ one member affiliated with an ACICS institution, ~~and one current Director.~~ The Board will have the authority to review perceived or actual conflicts of interest by a commissioner or Director and decide if the individual is to be directed to resign. The Board will meet at least annually, to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions and shall have the authority to review perceived or actual conflicts of interest by a commissioner or Director and decide if the individual is to be directed to resign.

OPTIONS

1. Vote to approve as final and publish effective immediately.
2. Vote to amend and approve as final and publish effective immediately.
3. Vote to amend the policy and bring before the Council in April:
4. Recommend a different approach to policy issue as stated below:
5. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Guinan moved to accept option 2 as amended.

SECONDED: Commissioner Ferrell moved to second the motion

AMENDMENTS/GUIDANCE:

Revise as follows:

~~*Board of Ethies*~~*Ethics Review Committee*. The ~~Board of Ethies~~Ethics Review Committee shall consist of ~~three~~four individuals selected by ~~the Board~~ACICS consisting of two independent, public members, ~~and~~ one member affiliated with an ACICS institution, and one current Director. ~~The Board will have the authority to review perceived or actual conflicts of interest by a commissioner or Director and decide if the individual is to be directed to resign.~~The committee shall meet at least annually, to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions. In addition, as needed, the committee shall meet to review any actual or perceived ethical violations of the Directors and provide recommendations for resolution.

Motion that Commissioner Timm be appointed to the Ethics Review Committee.

MOVED: Guinan

SECOND: Leak

...

Michelle Edwards

From: Judee Timm <[REDACTED]>
Sent: Sunday, November 24, 2019 9:59 PM
To: Michelle Edwards
Subject: Re: ACICS Ethics Review Committee - Email to Greg Ferguson

Michelle, This is the email I sent to Greg when forming the committee. Judee

> On Mar 25, 2019, at 2:06 PM, Judee Timm <[REDACTED]> wrote:

>

> Dear Greg

>

> Thank you for agreeing to serve on the ACICS Ethics Review Committee. At our last Commission meeting, we approved expanding the duties of this committee to include the development of a Code of Ethics in addition to its current responsibility of reviewing noncompliance conflict of interest issues. Developing the code will require the committee to meet via conference call to review ACICS's current codes of conduct and solicit feedback from our members before recommending a code that reflects our association's values and culture. At this date, we are still forming the committee; but in the meantime, I have attached several current documents that ACICS now has in place. Please take some time to review them as a starting point to our project.

>

> Given that our Commission meeting will held all next, I will begin setting up a conference call after April 7. Thank you again for agreeing to serve on this important project. If you have any questions, please do not hesitate to contact me at jtimm@mpc.edu.

>

> Judee Timm, Ph.D.

> ACICS Commissioner

>

> <Conflict of Interests and Canons Documents.pdf><Standards of Ethical Responsibility.docx>

>

> .

Michelle Edwards

Subject: Ethics Review Committee - Email to Jin-Hwa
Attachments: ACCSC mission.docx; ACCET Mission.docx; COE History.docx; ACICS Mission.docx; Conflict of Interests and Canons Documents.pdf; Standards of Ethical Responsibility.docx
Importance: High

From: Judee Timm <[REDACTED]>
Subject: Re: ACICS Ethics Committee - Welcome to the Committee
Date: April 10, 2019 at 1:24:58 PM PDT
To: [REDACTED]
Cc: Michelle Edwards <[REDACTED]>

Jin-Hwa,

Thank you for agreeing to serve on the ACICS Ethics Review Committee. Matt Johnson and Greg Ferguson will join us in developing a proposed "Code of Ethics" for our ACICS Commission to consider for adoption. Now that we have a full committee, I would like to meet via conference call in the next couple of weeks to discuss our approach and next steps forward. In the meantime, I am attaching several documents that ACICS current has in place and some other agency documents on ethics, values, mission,..etc. Please review this material before we meet. If you have any other documents that may help, please don't hesitate to share them. Our President, Ms. Michelle Edwards, is working on setting up a face-to-face meeting at our annual conference in May. We will let you know the date and time as soon as possible.

I look forward to meeting and working with you in the near future. Judee Timm, ACICS Commissioner

**ETHICS REVIEW COMMITTEE
MINUTES
Thursday, May 2, 2019
1:00 PM – 2:00 PM**

Committee Members

Commissioner Judee Timm, Chair

Mr. Gregory Ferguson

Ms. Jin-Hwa Frazier (Absent)

Mr. Matthew Johnston

Staff Liaison

Ms. Michelle Edwards

CALL TO ORDER

Commissioner Timm called the meeting to order at 1:04 PM, May 2, 2019.

OLD BUSINESS

None

NEW BUSINESS

- I. Introductions
 - Committee members Timm, Ferguson, Johnston and Staff Liason, Michelle Edwards, introduced themselves and identified their credentials and work experiences in private and public education and with ACICS.

- II. Department of Education – Recap of Citation on Ethics
 - Michelle Edwards provided a recap of the DOE recognition process since 2016 where 26 citations were first reported.
 - Since then, DOE recognition has been restored; however, two areas of concern remain -- one regarding the activities of the Ethics Review Committee.
 - Ms. Edwards sent the following section of the DOE report regarding the activities of the Ethics Review Committee:

“In addition, Department staff is aware that some previous members of the decision-making body were connected to institutions that were themselves the subject of serious concern to the agency for various reasons. The agency was also aware of the appearance of inappropriate self- interest and a lack of competency presented by those previous situations. During its April 2016 decision-meeting, ACICS drafted a proposal to create an ethics review board for the purpose of identifying any decision-makers who should resign or be removed from their positions. That draft proposal was sent to the agency’s constituents for comments

before adoption by the agency. The agency needs to provide information and documentation on how the Ethics Review Board will specifically prevent the ethical issues faced by ACICS over the past several years.”

III. Charge of This Committee

- ACICS Bylaws outline the charge and activities of the Ethics Review Committee as follows:

BYLAWS, ARTICLE V, Committees

Section 2–Standing Committees of the Board of Directors. There shall be the following standing committees of the Board:

Ethics Review Committee. The Ethics Review Committee shall consist of four individuals selected by ACICS consisting of two independent, public members, one member affiliated with an ACICS institution, and one current Director. The committee shall meet at least annually, to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions. In addition, as needed, the committee shall meet to review any actual or perceived ethical violations of the Directors and provide recommendations for resolution.

- Since its formation, the Ethics Review Committee has not met. The committee, during this time, focused on meeting when ethical violations were reported. During this time, no ethical violations were reported.
- It was noted, however, that this committee needs to be proactively involved **“to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions;”** and to **“provide information and documentation to the DOE on how the Ethics Review Board will specifically prevent the ethical issues faced by ACICS over the past several years.”**
- As a result, we are now meeting to evaluate and address areas where ACICS can better promote and report ethical expectations of our organization.
- It should be noted that this committee is a recommending body. The ACICS Board of Directors will make final decisions on the any recommendations from this committee.

IV. Key Observations

- It was noted that ACICS has historically promoted ethical behavior in its operations with the development of its mission and standards.
- The ACICS mission is clearly stated to all stakeholders on its website.
- Several ethics documents (i.e. Employee Conflict of Interest and Ethical Standards, Council Standards of Ethical Responsibilities, and Canons of Behavior for Evaluation Team Members) are used consistently requiring each employee/member/evaluator to review and sign the document before performing their duties. These documents are posted on the website, but are difficult to locate.
- The current value statement is vague and needs enhancement to capture the core values of this organization.

- There is a need for a comprehensive document on organizational ethics that clearly defines the ACICS commitment to ethics and incorporates all current documents on ethics in one place.
- V. Proposal Moving Forward
- Timm proposed developing an ethics handbook for ACICS that incorporates all related documents, statements, and policies in one area.
 - Enhance the core values statement from feedback from stakeholders.
 - Conduct four focus groups (i.e. business owners, staff, evaluators, and commissions) to identify key values of our stakeholders.
 - Recommend handbook to the Commission for approval before distribution to the field.
 - The committee agreed on moving forward with this proposal.

ADJOURNMENT

Meeting was adjourned at 11:05 a.m. PST.

*Next Meeting at Annual Conference – May 9, 11:45 am – 12:45 pm;
Ethics Session – May 9, 2:15 pm – 3:30 pm.*

**ETHICS REVIEW COMMITTEE
MINUTES
Thursday, May 9, 2019**

Committee Members

Present: Judee Timm, Commissioner; Gregory Ferguson; Jin-Hwa Frazier; Matthew Johnston; Michelle Edwards, Staff Liason

Absent: None

CALL TO ORDER

Commissioner Timm called the meeting to order at 12 noon, May 9, 2019.

OLD BUSINESS

Reviewed and approved minutes of May 2, 2019, with edits regarding the scope and duties of the ethics review committee.

NEW BUSINESS

Introductions:

Given this was the first in-person meeting of the Ethics Review Committee, brief introductions of committee members were given highlighting experiences and interest in this committee's charge.

Scope and Charge of Committee Members:

A brief discussion addressed the time commitment of committee members on the committee in lieu of what is expected. Commissioner Timm reviewed the main activity of the committee is to review any areas of ethical non-compliance and make recommendations to the Commission. In addition, this year we will be formulating a Ethics Handbook that incorporates all documents currently used by ACICS and outlines the agency's core values and code of conduct. Committee members will be asked to review a draft before submitting it to the Commission for approval.

Conference Session on Ethics and Review of Questions:

The conference session on "Creating a Culture of Ethics" was discussed. This session was presented later in the afternoon to school owners. The Committee reviewed questions developed to solicit views on ethics and ethical practices that are important in the operation of schools and in the accreditation process. Committee members were asked to attend this session and participate in the discussion.

ADJOURNMENT

Meeting adjourned at 12:40 p.m..

Establishing a Culture of Ethics

An Introduction at the 2019 ACICS Professional Development Conference

Summary

As a result of its revision of the purview of the Ethics Review Committee (ERC) of the Board, and in line with the ACICS 2019 Conference theme, a session was facilitated by BOD liaison, Dr. Judee Timm, with school owners and executives on this topic. The development of content and focus of the session was based on the objective of the Committee to “...allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions.”

Attached to this synopsis is a copy of the presentation prepared by Dr. Timm, and Ms. Monica Llerena, School Owner. In addition to the presentation, another school administrator, Ms. Jeanne Herrmann of Broadview University, provided the institutional perspective on the dilemmas and challenges that influence the organizational culture on a daily basis. Thoughts were also shared on the responsibility assumed by commissioners, evaluators, and IRC members in representing the Council in an ethical manner.

Group Discussion

1. What do you believe are commonly known Conflicts of Interest that our schools currently face internally or with governing agencies?
 - ✓ Nepotism
 - ✓ Independence/autonomy between faculty and leadership
2. What are your expectations of ACICS in assisting you in the process of delivering quality education?
 - ✓ Collaboration
 - ✓ No one answers the phone
 - ✓ Clarity in roles/responsibility to facilitate outreach to the appropriate individual
3. What do you think is the most important core value in the accreditation process?
 - ✓ (Academic) Integrity
 - ✓ Quality
 - ✓ Accountability
4. How do you communicate your values and expectations to your students and staff? Is this an ongoing process?
 - ✓ Management by Walking Around – observe engagement, quality instruction, and learning environment

Establishing a Culture of Ethics

Presented by:

Dr. Judee Timm, Commissioner Liaison, ACICS Ethical Review Committee

Ms. Monica Llerena, President, College of Business and Technology



May 9, 2019

ACICS 2019 Annual Conference

“Assuring Quality Through Transparency and Accountability”

ACICS Mission Statement

The mission of the Accrediting Council for Independent Colleges and Schools is to advance educational excellence at independent, nonpublic career schools, colleges, and organizations in the United States and abroad. This is achieved through a deliberate and thorough accreditation process of quality assurance and enhancement as well as ethical business and educational practice.

Why is it Important to Implement an Ethics Program?

- Communicates your philosophy
- Strengthen relationships
- Improves your reputation
- Eliminates any confusion on your stance regarding ethical behaviors
- Insures that your are in compliance with rules and regulations
- Helps hire and retain satisfied employees

Developing an Effective Ethics Program

- Standards and Procedures
- Leadership and Oversight
- Communication and Effective Training
- Monitor and Audit
- Discipline and incentives (Accountability)
- Corrective Action when needed.

The First Step: Identify Your Core Values – What You Believe

- The heart of your organization
- Forms the foundation for everything that happens in your organization
- Represents your highest priorities, deeply held beliefs, fundamental driving forces
- Core values are fundamental to recruiting and retaining the best employees
- Senior leaders who “walk the talk” have an overreaching influence on the organizational culture.

Impact of Identifying Core Values

- Purpose: helps in making decisions, allocate resources, and grow
- Prioritized under 3 main ideals
 - 1) How people interact
 - 2) Work of your organization
 - 3) Individual responsibility

Examples of Core Values

- Respect for people
- Integrity
- Quality
- Passion
- Having Fun!
- Hard work and accountability
- Leadership
- Communication
- Continuous improvement

Top Priorities of School Owners, CEOs, and High Executives

- Building Employee Engagement
- Uphold Vision/Mission/Core Values (Culture)
- Building Bridges

What does your communication platform look like?

- Newsletters/Email Announcements
- MBWA (Management By Walking Around)
- Special Meetings/Committees

What activities do you implement to share ethical standards/procedures?

- Onboarding, Training, and Continued education
- Understanding of Organizational Core Values/Vision/Mission
- Identifying what the Laws/Rules/Guidelines govern your institution

Ethical Dilemmas

- **Ethical Standards:** A coworker of yours has been given two weeks notice due to budget cuts. They use that time wastefully and start gathering intellectual property of the company and putting them on their USB drive. Scanning documents and deleting information. Do you advise them to stop? Do you approach your supervisor? Do you not say anything?
- **Conflict of Interest:** Company policy forbids employees to engage in social media activities with students. A popular faculty member has been caught adding students to their social media networks; do you fire him/her?
- **Conflict of Interest:** A new student one week after a new term comes to your office complaining that they have been lied to by the admissions rep. When asked how, the student answers that they promised that the teacher they are getting was going to be fantastic and has a great reputation. That teacher no longer works for the company as of the last term. What do you do?
- **Ethical Standards:** A student anonymously leaves a note to the Director of Education with complaints about a faculty member's classroom demeanor. The DOE seemed to take the student's complaint as given despite positive classroom reviews for the past 3 terms. What do you do?
- **Have You Ever**
... lied to your employees?... lied so you wouldn't hurt someone's feelings?... fudged figures on a report to make the results look better?... cut corners on quality control?... blamed someone else for something you knew you were partly responsible for?... used any of these phrases: "Everybody does it," "It's the lesser of two evils," "It's only a little white lie," "It doesn't hurt anyone," "Who will know?"... put inappropriate pressure on others?

Questions

1. What do you believe are commonly known Conflicts of Interest that our schools currently face internally or with governing agencies?
2. In the past ACICS town hall meetings or conferences, what workshop or element was missing that would support in creating a stronger platform of communication with ACICS leadership?
3. Do you currently have an Ethics committee or Review board, and do you believe one should be mandated by a governing agency?
4. Do you believe the current auditing process supports schools in both creating and maintaining ethical practices? If not, what is Broken, Missing, or Not clear?
5. What are your expectations of ACICS in assisting you in the process of delivering quality education?
6. What do you think is the most important core value in the accreditation process?
7. How do you communicate your values and expectations to your students and staff? Is this an ongoing process?
8. How can ACICS improve communication of expectations in the accrediting process, advancements in the field, and/or rules and regulations?
9. How do you get buy-in from your staff, students, administrators, and instructors to your stated ethical standards?
10. How often do you critically review your establish code of ethics in your organization?

ACICS Board of Directors Meeting Minutes

August 5, 2019
9:00 AM – 11:00 AM

1. **Call to Order** **R. Bennett**
The meeting was called to order at 9:05am.

2. **Approval of Meeting Minutes** **R. Bennett**
 - a. Board of Directors – April 1, 2019
 - b. Executive Committee Presidents' Report (May 19 – July 19)
Motion to approve the minutes.
Moved: Ramirez
Second: Fateri
Unanimously approved

3. **Chairman's Remarks** **R. Bennett**

4. **Litigation Update** **K. Ingram**
ACICS currently has no open litigation. Concerning the West Virginia Business College case, a judgement has been rendered in favor of ACICS. [REDACTED] [REDACTED] is still under discussion.

5. **President's Report** **M. Edwards**
See the attached report (Attachment A)

6. **Ethics Review Committee Report** **J. Timm**
See the attached reports (Attachment B – Minutes; Attachment C – Draft ACICS Code of Conduct) for details and drafts of the work conducted by the Ethics Review Committee including the minutes of their meetings, and the proposed draft of the Code of Ethics guidance document.

Motion to accept the Committee's meeting minutes and to accept the draft language of the Code of Ethics with needed amendments for continued development and review.
Moved: Commissioner Guinan
Second: Commissioner Loveman

7. Treasurer's Report

L. Leak

See attached (Attachment D) for the unaudited numbers and projections. The Board discussed the actuals of the recently concluded FY 2019, as well as the projected budgets for 2021 - 2023. Of note is the scheduled annual audit in September.

8. Investment Committee Report

L. Leak

See the attached report (Attachment E) which was discussed by the Board to include investigation of the interest rate on cash reserves. Additionally, representatives of the Wealth Management firm, BMO, will be providing training to the Board on ACICS' investment portfolio to ensure awareness and consistency on ACICS' investment policies and activities.

9. Adjourn

The meeting adjourned at 11:20am.

ATTACHMENT B

ETHICS REVIEW COMMITTEE MINUTES Thursday, May 2, 2019 1:00 PM – 2:00 PM

Committee Members

Commissioner Judee Timm, Chair

Mr. Gregory Ferguson

Ms. Jin-Hwa Frazier (Absent)

Mr. Matthew Johnston

Staff Liaison

Ms. Michelle Edwards

CALL TO ORDER

Commissioner Timm called the meeting to order at 1:04 PM, May 2, 2019.

OLD BUSINESS

None

NEW BUSINESS

- I. Introductions
 - Committee members Timm, Ferguson, Johnston and Staff Liason, Michelle Edwards, introduced themselves and identified their credentials and work experiences in private and public education and with ACICS.
- II. Department of Education – Recap of Citation on Ethics
 - Michelle Edwards provided a recap of the DOE recognition process since 2016 where 26 citations were first reported.
 - Since then, DOE recognition has been restored; however, two areas of concern remain -- one regarding the activities of the Ethics Review Committee.
 - Ms. Edwards sent the following section of the DOE report regarding the activities of the Ethics Review Committee:

“In addition, Department staff is aware that some previous members of the decision-making body were connected to institutions that were themselves the subject of serious concern to the agency for various reasons. The agency was also aware of the appearance of inappropriate self- interest and a lack of competency presented by those previous situations. During its April 2016 decision-meeting, ACICS drafted a proposal to create an ethics review board for the purpose of identifying any decision-makers who should resign or be removed from their positions. That draft proposal was sent to the agency’s constituents for comments

ATTACHMENT B

before adoption by the agency. The agency needs to provide information and documentation on how the Ethics Review Board will specifically prevent the ethical issues faced by ACICS over the past several years.”

III. Charge of This Committee

- ACICS Bylaws outline the charge and activities of the Ethics Review Committee as follows:

BYLAWS, ARTICLE V, Committees

Section 2–Standing Committees of the Board of Directors. There shall be the following standing committees of the Board:

Ethics Review Committee. The Ethics Review Committee shall consist of four individuals selected by ACICS consisting of two independent, public members, one member affiliated with an ACICS institution, and one current Director. The committee shall meet at least annually, to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions. In addition, as needed, the committee shall meet to review any actual or perceived ethical violations of the Directors and provide recommendations for resolution.

- Since its formation, the Ethics Review Committee has not met. The committee, during this time, focused on meeting when ethical violations were reported. During this time, no ethical violations were reported.
- It was noted, however, that this committee needs to be proactively involved “**to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions;**” and to “***provide information and documentation to the DOE on how the Ethics Review Board will specifically prevent the ethical issues faced by ACICS over the past several years.***”
- As a result, we are now meeting to evaluate and address areas where ACICS can better promote and report ethical expectations of our organization.
- It should be noted that this committee is a recommending body. The ACICS Board of Directors will make final decisions on the any recommendations from this committee.

IV. Key Observations

- It was noted that ACICS has historically promoted ethical behavior in its operations with the development of its mission and standards.
- The ACICS mission is clearly stated to all stakeholders on its website.
- Several ethics documents (i.e. Employee Conflict of Interest and Ethical Standards, Council Standards of Ethical Responsibilities, and Canons of Behavior for Evaluation Team Members) are used consistently requiring each employee/member/evaluator to review and sign the document before performing their duties. These documents are posted on the website, but are difficult to locate.
- The current value statement is vague and needs enhancement to capture the core values of this organization.

ATTACHMENT B

- There is a need for a comprehensive document on organizational ethics that clearly defines the ACICS commitment to ethics and incorporates all current documents on ethics in one place.

- V. Proposal Moving Forward
 - Timm proposed developing an ethics handbook for ACICS that incorporates all related documents, statements, and policies in one area.
 - Enhance the core values statement from feedback from stakeholders.
 - Conduct four focus groups (i.e. business owners, staff, evaluators, and commissions) to identify key values of our stakeholders.
 - Recommend handbook to the Commission for approval before distribution to the field.
 - The committee agreed on moving forward with this proposal.

ADJOURNMENT

Meeting was adjourned at 11:05 a.m. PST.

*Next Meeting at Annual Conference – May 9, 11:45 am – 12:45 pm;
Ethics Session – May 9, 2:15 pm – 3:30 pm.*

ATTACHMENT B

ETHICS REVIEW COMMITTEE MINUTES Thursday, May 9, 2019

Committee Members

Present: Judee Timm, Commissioner; Gregory Ferguson; Jin-Hwa Frazier; Matthew Johnston; Michelle Edwards, Staff Liason

Absent: None

CALL TO ORDER

Commissioner Timm called the meeting to order at 12 noon, May 9, 2019.

OLD BUSINESS

Reviewed and approved minutes of May 2, 2019, with edits regarding the scope and duties of the ethics review committee.

NEW BUSINESS

Introductions:

Given this was the first in-person meeting of the Ethics Review Committee, brief introductions of committee members were given highlighting experiences and interest in this committee's charge.

Scope and Charge of Committee Members:

A brief discussion addressed the time commitment of committee members on the committee in lieu of what is expected. Commissioner Timm reviewed the main activity of the committee is to review any areas of ethical non-compliance and make recommendations to the Commission. In addition, this year we will be formulating a Ethics Handbook that incorporates all documents currently used by ACICS and outlines the agency's core values and code of conduct. Committee members will be asked to review a draft before submitting it to the Commission for approval.

Conference Session on Ethics and Review of Questions:

The conference session on "Creating a Culture of Ethics" was discussed. This session was presented later in the afternoon to school owners. The Committee reviewed questions developed to solicit views on ethics and ethical practices that are important in the operation of schools and in the accreditation process. Committee members were asked to attend this session and participate in the discussion.

ATTACHMENT B

ADJOURNMENT

Meeting adjourned at 12:40 p.m..



ACICS Code of Conduct

A descriptive overview of the operational philosophy and standards of the Accrediting Council of Independent Colleges and Schools



Message from Michelle Edwards, ACICS President/CEO



ACICS Mission

The mission of the Accrediting Council for Independent Colleges and Schools is to advance educational excellence at independent, nonpublic career schools, colleges and organization in the United States and abroad. This is achieved through a deliberate and thorough accreditation process of quality assurance and enhancement as well as ethical business and educational practice.

Purpose

Our purpose is to support and hold accountable our member schools in the delivery of quality educational experiences and services that prepare students for successful careers. |

Commitment

Our commitment to student success drives our actions to provide:

- *Quality, rigorous, and relevant standards*
- *Exceptional service and support*
- *Up-to-date training opportunities*
- *Fair evaluation processes*
- *Timely communication and feedback*

Core Values

~A Foundation for Everything We Do~

Our core values support our mission, services, and operations. Consequently, the following values serve as a foundation for everything we do and are integrated in all accreditation processes and actions.



Student Success

Student Success

Recognizing that the ultimate goal in education is to provide quality, valid, and timely experiences that will prepare students for the 21st century workforce, we value standards, practices, and services that support student achievement in attaining professional goals.



Respect/ Inclusion

Respect/Inclusion

Recognizing the value of diversity in background, culture, gender, education, talents, and experiences, all stakeholders in the accreditation process must be respected for the unique perspectives and knowledge they bring to the educational experience. This includes our members, employees, students, administrators, evaluators, and the public among others.



Quality

Quality

Noting that maintaining quality in education demands continual efforts and updates to meet the demands of a changing workforce, we strive to provide quality products, training, and services that support schools in their efforts to ensure student success.



Accountability

Accountability

As an accrediting agency, we accept our responsibility to assess compliance with published administrative and academic standards and seek continuous improvement for excellence at our accredited institutions. We hold ourselves accountable to provide appropriate accrediting criteria and enhancement services, promote quality standards, adhere to ethical business practices and accept the outcomes of our actions.



Transparency

Transparency

The key to success in the accreditation process depends on our ability to be readily understood. Therefore, it is important that we keep our stakeholders informed by making information of all operations (i.e. standards, goals, direction, decisions, etc.) visible and accessible in a timely manner. Transparency in all we do will support a collaborative effort across the triad in our effort to achieve quality educational experiences for students.

Code of Conduct

To support our Mission and maintain our Core Values, ACICS has created the following Code of Conduct that is reflected in various working documents used throughout the agency.

Honesty

We are committed to the truth by being straightforward and adhering to facts. Our decisions will be based on facts supported by data and evidence that maintain the highest standards of ethical conduct.

Fairness

We are committed to applying rules, regulations, and expectations fairly across our entire operation (e.g. school to school, team to team, employee to employee, etc.). We recognize that fairness is critical in building trust, cooperation, and effective collaboration.

Confidentiality

We are committed to preserving the confidentiality of the institutional information as permitted by the *Accreditation Criteria*, federal and state laws, and regulations. In order to protect the integrity of the accreditation process, we will ensure that written policies and procedures preventing unauthorized disclosures are actively implemented.

Impartiality

We are committed first and foremost to our official responsibilities as trusted members in the accreditation process. Conflict of interests (personal or business) must be disclosed to ensure that all decisions and/or processes are fair and not unduly influenced by outside interests.

Compliance

We are committed to conducting our operations in full compliance with applicable rules and regulations required by the U.S. Department of Education (ED) and the Council for Higher Education Accreditation (CHEA). We take responsibility for understanding the legal and regulatory requirements that apply to our activities and will work with the US Department of Education and state governments on complying with relevant laws, policies, procedures, and mandates.

Integrity

We are committed to firmly adhere to our ethical principles and values by being honest, open, and truthful regardless of circumstances or consequences. We will do what is right because it is the right thing to do.

ACICS Current Working Documents

- *ACICS Canons of Ethical Behavior – Evaluation Teams*
- *ACICS Canons of Ethical Responsibility – Intermediate Review Committee*
- *Council Standards of Ethical Responsibility*
- *ACICS Employee Agreement – Conflict of Interest and Ethical Standards*



For more information contact:

ACICS
1350 Eye Street, NW
Suite 560
Washington, D.C. 20005
Telephone: 202-336-6780

Perlter Walters-Gilliam

From: Michelle Edwards <andrea@acics.ccsend.com> on behalf of Michelle Edwards <medwards@acics.org>
Sent: Monday, September 30, 2019 10:55 AM
To: Perlter Walters-Gilliam
Subject: ACICS: Code of Conduct



Message from Michelle Edwards, President & CEO

In February 2019, the Council updated the purpose and authority of the Board of Ethics as created in 2016. The Board has revised its intent for this Standing Committee over the last two years. The Ethics Committee was originally created to review perceived or actual conflicts of interest regarding commissioners/directors. However, the Council has deemed it necessary to expand the role and responsibility of the Committee.

The Ethics Review Committee is a standing committee of the Board of Directors and the excerpt from the Bylaws is included below:

Section 2–Standing Committees of the Board of Directors. There shall be the following standing committees of the Board:

(e) Ethics Review Committee. The Ethics Review Committee shall consist of four individuals selected by ACICS consisting of two independent, public members, one member affiliated with an ACICS institution, and one current Director. The Committee shall meet at least annually to allow for continuous evaluation of the ethical practices that govern the Council, staff, and its institutions. In addition, the committee shall meet on and as-needed basis to review perceived or actual ethical violations of Directors and provide recommendations for resolution.

As a result of the expanded role of this Committee, we have compiled documents that have been in use by ACICS for many years, and present them collectively as a Code of Conduct which can be found below:

[Code of Conduct](#)

The ACICS Code of Conduct represents a commitment to all our stakeholders and illustrates who we are, how we work, what we stand for, and why we will continue living up to our values and principles. This Code serves as a basis for all our actions, decisions, strategies, and services. It is fundamental to our processes that assure ethical standards, policies, and procedures are being accomplished. (See "Working Documents" on final page of the document).

It is my hope that every stakeholder in the educational process will review our Code and help us to continually improve our methods of serving and supporting students, employees, and our schools. Our commitment to this Code of Conduct is our pledge that ACICS will follow the path of integrity, transparency, and quality in service to our institutions and the students they serve. Together, all of us must work to effectively address the challenges and opportunities of 21st century education. Using this Code of Conduct as our guide, I am excited about our future and continued legacy in higher education.

(b)(6)

ACICS, 1350 Eye Street, NW, Suite 560, Washington, DC 20005

[SafeUnsubscribe™](#) pwgilliam@acics.org

[Forward this email](#) | [Update Profile](#) | [About our service provider](#)

Sent by medwards@acics.org



ACICS
Email Statistics
11/20/2019

Email Name: Code of Conduct Distribution

Template: Press Announcements - Classic

Lists: Current Commissioners
Current Staff
Stakeholders (institutional email, primary contact, and CEO)
Active Evaluators 9,30.19

Email Run History

| Sending Type | Sent | Run Date | Status |
|---------------|------|-----------|-------------------|
| Original Send | 803 | 9/30/2019 | Successfully Sent |

Email Stats

| Sent | Bounces | Spam Reports | Unsubscribes | Opens | Clicks | Forwards |
|------|----------------|--------------|--------------|----------------|---------------|----------|
| 803 | 12.6% (101) | 0 | 0 | 63.0% (442) | 15.8% (70) | 0 |

Click-through Stats

| Email Link | Unique Click-throughs | Click-through Distribution |
|---|-----------------------|----------------------------|
| http://www.acics.org/contact/content.aspx?id=-7600 | 70 | 100.0% |
| Total Click-throughs | 70 | 100% |

Social Stats

| Page Views | Share | Send | Like | Twitter | LinkedIn | (Other) |
|------------|-------|------|------|---------|----------|---------|
| 0 | 0 | 0 | 0 | 0 | 0 | 0 |

About Us

[Background](#)[Commissioners](#)[Staff](#)[Review Board](#)[Code of Conduct](#)[Annual Report](#)[Publications](#)

Code of Conduct

To support our mission and maintain our core values, ACICS has adopted a Code of Conduct that embodies the following qualities:

- **Honesty**
- **Fairness**
- **Confidentiality**
- **Impartiality**
- **Compliance**
- **Integrity**

THE COMPLETE CODE OF CONDUCT IS AVAILABLE HERE

ACICS Current Working Documents

Canons of Ethical Behavior

(Evaluation Teams)

Responsibility and Confidentiality

(Intermediate Review Committee)

Council Standards of Ethical Responsibility

(Commissioners)

Standards of Ethical Responsibility

(Review Board of Appeals)

Standards of Ethical Responsibility

(ACICS Staff)

Accredited institutions commit to operating in accordance with the standards, policies, and procedures established by the Council in the Accreditation Criteria. **Learn more.**

ACICS is committed to collaborating with institutions to help them meet the necessary criteria and ultimately attain an accreditation status. **Learn more** about beginning the initial accreditation process.

ACICS works with applicant institutions toward meeting ACICS standards and attaining an initial accreditation status. **Click here** to see the steps involved.

NAVIGATION

- [About](#)
- [Accreditation](#)
- [Council Actions](#)
- [Students](#)
- [Evaluators](#)
- [News & Events](#)

CONTACT US

1350 Eye Street, NW, Suite
560
Washington, DC 20005
Tel: 202.336.6780
Fax: 202.842.2593

[GET IN TOUCH](#)

I WANT TO...

- [Create an Account](#)
- [Login](#)
- [Apply for Accreditation](#)
- [Begin a Branch Application](#)





Accrediting Council for
Independent Colleges & Schools

Code of Conduct

A descriptive overview of the operational
philosophy and standards of the Accrediting
Council for Independent Colleges and Schools

2019

Message from Michelle Edwards, President & CEO

For over 107 years ACICS has been committed to student success by supporting our member institutions in their efforts to provide quality educational experiences and outcomes. As a national accrediting organization, we are committed to offering a thorough accreditation process of quality assurance and enhancement as well as ethical business and educational practices.

The ACICS *Code of Conduct* represents a commitment to all our stakeholders and illustrates who we are, how we work, what we stand for, and why we will continue living up to our values and principles. This *Code* serves as a basis for all our actions, decisions, strategies, and services. It is fundamental to our processes that assure ethical standards, policies, and procedures are being accomplished. (See "*Working Documents*" on final page of this document).

It is my hope that every stakeholder in the educational process will review our *Code* and help us to continually improve our methods of serving and supporting students, employees, and our schools. Our commitment to this *Code of Conduct* is our pledge that ACICS will follow the path of integrity, transparency, and quality in service to our institutions and the students they serve. Together, all of us must work to effectively address the challenges and opportunities of 21st century education. Using this *Code of Conduct* as our guide, I am excited about our future and continued legacy in higher education.

(b)(6)

Mission

The mission of the Accrediting Council for Independent Colleges and Schools is to advance educational excellence at independent, nonpublic career schools, colleges and organizations in the United States and abroad. This is achieved through a deliberate and thorough accreditation process of quality assurance and enhancement as well as ethical business and educational practices.

Purpose

Our purpose is to support and hold accountable our member schools in the delivery of quality educational experiences and services that prepare students for successful professional, technical, or occupational careers.

Commitment

Our commitment to student success drives our actions to provide:

- Quality, rigorous, and relevant standards
- Exceptional service and support
- Up-to-date training opportunities
- Fair evaluation processes
- Timely communication and feedback

Core Values

~A Foundation for Everything We Do~

Our core values support our mission, services, and operations. They serve as a foundation for everything we do and are integrated in all accreditation processes and actions.



Student Success

Student Success

Recognizing that the ultimate goal in education is to provide quality, valid, and timely experiences that will prepare students for the 21st century workforce, we value standards, practices, and services that support student achievement in attaining professional goals.



Respect & Inclusion

Respect & Inclusion

Recognizing the value of diversity in background, culture, gender, education, talents, and experiences, all stakeholders in the accreditation process must be respected for the unique perspectives and knowledge they bring to the educational experience. This includes our members, employees, students, administrators, evaluators, and the public, among others.



Quality

Quality

Noting that maintaining quality in education demands continual efforts and updates to meet the demands of a changing workforce, we strive to provide quality products, training, and services that support schools in their efforts to ensure student success.



Accountability

Accountability

As an accrediting agency, we accept our responsibility to assess compliance with published administrative and academic standards and seek continuous improvement at our accredited institutions. We hold ourselves accountable to provide appropriate accrediting criteria and enhancement services, promote quality standards, adhere to ethical business practices, and accept the outcomes of our actions.



Transparency

Transparency

The key to success in the accreditation process depends on our ability to be readily understood. Therefore, it is important that we keep our stakeholders informed by making information of all operations (i.e. standards, goals, direction, decisions, etc.) accessible in a timely manner. Transparency in all we do will support a collaborative effort across the triad in our effort to achieve quality educational experiences for students.

Code of Conduct

To support our Mission and maintain our Core Values, ACICS has created the following Code of Conduct that is reflected in various working documents used throughout the agency.

Honesty

We are committed to the truth by being straightforward and adhering to facts. Our decisions will be based on facts supported by data and evidence that maintain the highest standards of ethical conduct.

Fairness

We are committed to applying rules, regulations, and expectations fairly across our entire operation (e.g. school to school, team to team, employee to employee, etc.). We recognize that fairness is critical in building trust, cooperation, and effective collaboration.

Confidentiality

We are committed to preserving the confidentiality of the institutional information as permitted by the *Accreditation Criteria*, federal and state laws and regulations. In order to protect the integrity of the accreditation process, we will ensure that written policies and procedures preventing unauthorized disclosures are actively implemented.

Impartiality

We are committed first and foremost to our official responsibilities as trusted members in the accreditation process. Conflict of interests (personal or business) must be disclosed to ensure that all decisions and/or processes are fair and not unduly influenced by outside interests.

Compliance

We are committed to conducting our operations in full compliance with applicable rules and regulations required by the U.S. Department of Education (ED) and the Council for Higher Education Accreditation (CHEA). We take responsibility for understanding the legal and regulatory requirements that apply to our activities and will work with the ED and state governments on complying with relevant laws, policies, procedures, and mandates.

Integrity

We are committed to firmly adhere to our ethical principals and values by being honest, open, and truthful regardless of circumstances or consequences. We will do what is right because it is the right thing to do.

ACICS Current Working Documents

- Canons of Ethical Behavior (Evaluation Teams)
- Responsibility and Confidentiality (Intermediate Review Committee)
- Council Standards of Ethical Responsibility (Commissioners)
- Standards of Ethical Responsibility (Review Board of Appeals)
- Standards of Ethical Responsibility (ACICS Staff)

Reporting Suspected Ethical Violations

If you suspect a violation of the established ACICS ethical code, or have questions, complaints, or suggestions, please take the following steps to properly address your concerns:

1. Make sure you are able to provide background information regarding your concerns/ complaints/suggestions. In case of an incident report, make sure your information includes who was involved, what occurred, and where and when the incident(s) took place.
2. Contact the ACICS staff member or the ACICS manager in charge. Incident reporting also can be made anonymously by calling the ACICS office at 202-336-6780.

ACICS Ethics Review Committee

Mr. Gregory Ferguson – Public Representative
Ms. Jin-Hwa Frazier – Public Representative
Mr. Matthew Johnston – Member Institution
Dr. Judee Timm – Commissioner/Public Representative



Accrediting Council for
Independent Colleges & Schools

For more information contact:

ACICS
1350 Eye Street, NW
Suite 560
Washington, D.C. 20005
Telephone: 202-336-6780
info@acics.org



Peer Evaluators Canons of Ethical Behavior

v. September 2019

Members of onsite evaluation teams play a vital role in the application of ACICS policies, procedures, and standards focus on the evaluation and measurement of institutional performance consistent with the high level of integrity demanded of accreditation. Accordingly, the fulfillment of this role requires a clear and compelling understanding by evaluators of their function in the accreditation process.

In fulfilling accreditation responsibilities, an evaluator encounters a variety of issues and situations that require the exercise of fair and impartial judgement. Although the specifics of these issues and situation cannot be readily foreseen, the framework of such ethical principles represented in these Canons of Ethical Behavior is set forth:

As a volunteer evaluator for the Accrediting Council for Independent College and Schools,

1. I will conscientiously uphold the integrity of the accreditation process.
2. I will avoid impropriety and the appearance of impropriety while conducting all activities, including the accepting or offering of any gifts of material value.
3. I will perform all specified duties impartially and diligently.
4. I will preserve the confidentiality of the institutional information to which I am privy. This includes sharing information with an outside consulting agency.
5. I will, while representing ACICS, subscribe to the ACICS policy on Discrimination and Harassment during any and all interactions with the ACICS staff, other members of evaluation teams, or any person affiliated with an institution being evaluated. I have read the ACICS Policy on Discrimination and Harassment and will report to the ACICS President any action I perceive to be discriminatory or harassing.
6. I will refrain from any inappropriate business activity, in fact or appearance, relative to accreditation responsibilities related to serving on any evaluation team at any institution accredited by ACICS.
7. I will not solicit or accept any consulting requests from an institution for which I have served as a team member for a period of at least three years following the visit, regardless of my

status as an evaluator. Active solicitation during an on-site review will result in immediate suspension of active service as an evaluator.

8. I will notify ACICS if I accept any contractual agreements, involving compensation, from any ACICS-accredited institutions in order to prospectively remove myself from any ACICS activities relative to that institution.

By signing below, I acknowledge that I have read and will abide by these Canons of Ethical Behavior.

Full Name

Signature

Date



Intermediate Review Committee Responsibility and Confidentiality

v. September 2019

Each Intermediate Review Committee participant is required to read and abide by the Canons of Ethical Responsibility as adopted by the Council. The seven Canons of Ethical Responsibility are:

1. An IRC member shall uphold the integrity of the accreditation process.
2. An IRC member shall avoid impropriety and the appearance of impropriety in all activities.
3. An IRC member shall perform the duties impartially and diligently.
4. An IRC member shall refrain from any business activity inappropriate to accreditation responsibilities.
5. An IRC member shall initiate immediately full and open disclosure of any negotiations for or the actual assumption of ownership or control of an institution with which he/she may be directly or indirectly involved.
6. An IRC member shall preserve the confidentiality of the proposed Council action deliberations and of the institutional information to which he/she is privy.
7. An IRC member shall, in representing ACICS, subscribe to the ACICS policy on Discrimination and Harassment in his or her dealings and interaction with the ACICS staff, other members of the committee, or any person affiliated with an institution in his or her capacity as an IRC member. An IRC member is obligated to report to the ACICS Executive Director any action that he or she perceives to be discrimination or harassment. (The ACICS Policy on Discrimination and Harassment is disclosed on the following page.)

In adopting the Canons of Ethical Responsibility, the Council has put into words the expectations of those individuals selected to support the Council in its activities.

The Council encourages individuals to assist institutions in improving and upgrading themselves but requires that when significant assistance is provided to an institution, this individual will disclose this fact and refrain from taking part in any file review or proposed action concerning this institution.

During the IRC file review and presentation sessions, a number of topics of discussion will arise and numerous actions will be proposed to the Council. These discussions are open between the IRC participants and staff. However, an IRC member may not disclose these discussions and proposed actions to the membership. Proposed school actions must be kept confidential. The IRC members have a duty and a responsibility to serve all institutions fairly and equally. Staff assigns institutions under review to the Intermediate Review Committee, and in doing so, distributes them in such a way as to avoid conflicts of interest (i.e., an IRC member will not be assigned an institution for which they have any affiliation or past affiliation in the past five years, for which they are in direct competition, or an institution where s/he served as a member of the on-site evaluation team). If an IRC member has an interest in an institution or feels that there would be any conflict of interest in his or her review of an institution's file, the IRC member should immediately request, upon review of the assignment sheet, that the institution's file be given to someone else and may wish to refrain from participation in the deliberations concerning the proposed action on the institution's status. As a practice, when the IRC discusses an institution in which an IRC member has an interest, this individual may be asked to recuse her/himself from the room. Staff will advise when this may be necessary.

IRC members are expected not to inform institutions of the proposed actions following the review session. These actions are proposals to the Council; only the Council has the right to determine the final action on an institution. Institutions will be notified by certified mail of the Council's final action. The institution will receive this official notification within 30 days following the Council meeting. It is expected that should a member institution contact a member of the Intermediate Review Committee; the IRC member will advise callers to contact the ACICS office for appropriate information following receipt of the action in writing.

IRC Participant Name

Institution/Employer Affiliation

Signature

Date

Please provide any institutions with which you may have a conflict of interest:

- 1.
- 2.
- 3.
- 4.
- 5.



Council Standards of Ethical Responsibility

v. September 2019

Each Commissioner must read and comply with the following Standards of Ethical Responsibility in performing their ACICS duties:

1. A commissioner shall uphold the integrity of the accreditation process.
2. A commissioner shall avoid impropriety or the appearance of impropriety in all activities.
3. A commissioner shall perform the duties, as outlined in Article III of the Bylaws, impartially and diligently.
4. A commissioner shall refrain from any activity that might call into questions their fiduciary responsibility.
5. A commissioner shall, in a timely manner, disclose to the Council any actual, potential, or appearance of a conflict of interest and shall not participate in Council actions regarding an institution that is the subject of that conflict.
6. A commissioner shall preserve the confidentiality of Council deliberations, institutional data, and ACICS business information.
7. A commissioner shall exercise discretion in advocating for, or against, a policy which may impact an institution with which he or she is associated.
8. A commissioner shall not violate the ACICS Policy on Discrimination and Harassment in interactions with other commissioners, staff, evaluators, or any person associated with a member institution.
9. A commissioner shall not solicit or accept, either for themselves or a family member, anything of value from an ACICS-accredited institution or an applicant institution seeking ACICS accreditation.

A commissioner shall immediately inform the Chair and/or Vice-Chair of any potential violation of these Standards. The Chair and/or Vice-Chair will determine if a violation has occurred and will notify the Ethics Review Committee for follow up review and action, as applicable. The

commissioner involved shall have the opportunity to respond to the allegation in writing to the Ethics Review Committee which shall subsequently exercise discretion in advocating for, or against, a policy which may impact an institution with which he or she is associated. ly provide a recommendation to the Council for final action. If the Council determines that a serious violation has occurred, it may remove the commissioner by a two-thirds vote. The Council shall, in all cases, take such action as necessary in order to maintain the integrity of ACICS.

ACICS staff assigns institutions under review to commissioner prior to each meeting, and in doing so, distributes them in such a way as to avoid conflicts of interest. If a commissioner has any material interest in an institution or feels that there would be any conflict of interest, or appearance of the same, in his or her assignment to an institution's file, the commissioner must notify the Chair to request a reassignment of that file review and should, as appropriate, recuse or abstain from participating in the deliberations. The recusal or abstention will be recorded in the minutes.

Within 30 days after the close of the Council meeting, all institution on the agenda are notified in writing of any action taken by the Council. These actions must be kept confidential until official notification from the Council.

After the Council meeting, commissioner frequently will receive calls from representatives of institutions that were on the agenda who are seeking information concerning the action the Council has taken on their institutions. Commissioners should advise callers to contact the ACICS office for appropriate information following receipt of the action in writing.

The commissioner, by signing below, acknowledges that they have read and will abide by these Standards of Ethical Responsibility.

Full Name

Signature

Institution/Employer Affiliation

Date



ACICS Standards of Ethical Responsibility for ACICS Review Board of Appeals Members

v. September 2019

Each panel member of the ACICS Review Board must read and comply with the following Standards of Ethical Responsibility in performing their ACICS duties:

1. He/she shall uphold the accreditation process.
2. He/she shall avoid impropriety or the appearance of impropriety in all activities.
3. He/she shall perform the duties of the office impartially and diligently.
4. He/she shall refrain from any business activity inappropriate to accreditation responsibilities.
5. He/she shall disclose to the President any actual or potential conflict of interest and shall refrain from participating in review panel actions regarding an institution that is the subject of that conflict.
6. He/she shall preserve the confidentiality of the Review Board deliberations, institutional information and ACICS business information.
7. He/she shall not advocate for or against a policy which may impact an institution that is the subject of an appeal to the Review Board.
8. He/she shall not violate the *ACICS Policy on Discrimination and Harassment* in interactions with other review panel members, staff, or any person associated with a member institution.
9. He/she shall not solicit or accept, either for themselves or a family member, anything of value from an ACICS-accredited institution or an applicant institution seeking ACICS accreditation.

A member of the Review Board shall immediately inform the President of any potential violation of these Standards. The President will either determine that no violation has occurred or will notify the member of the Review Board involved of the allegation. The Review Board member involved shall have the opportunity to respond to the allegation in person or in writing to the President who shall make a determination. If the President determines that a violation has occurred, the Review Board member may be removed. In all other instances where a violation is found, the President shall take such action as necessary in order to maintain the integrity of ACICS.

I have read the **Standards of Ethical Responsibility for ACICS Review Board of Appeals Members** as stated above and agree to meet or exceed these Standards in performing my duties as a panel member of the Review Board.

(Signature)

(Date)

(Please Print Name)



Staff Standards of Ethical Responsibility

v. September 2019

Outside Interest:

In order to safeguard the activities and assets of the Accrediting Council for Independent Colleges and School (ACICS), employees of ACICS should not have interests in outside businesses which conflict or appear to conflict with their ability to act and make independent decisions in the best interest of ACICS.

An employee is considered to have an interest in an outside business if the employee or any member of his/her immediate family holds any ownership in the business or its property; furnishes goods or services to the business; is a creditor, employee, agent, officer, Vice President, or consultant of the business. Outside businesses include any person, firm, corporation, or government agency that sells or provides a service to, purchases from, or competes with ACICS.

At the time of hire, and periodically thereafter as requested, all employees will be required to complete an Agreement concerning ethical standards of conduct & conflict of interest. Periodic checks will be conducted by ACICS to determine whether changes have occurred; however, all employees are expected to exercise good judgment and discretion in evaluating a particular activity so as to avoid any actual, or apparent, conflict of interest. If there is a doubt, the employee should discuss it with his/her supervisor and/or the Senior Human Resources Coordinator.

Excluded are investments in the securities of a bank, public utilities, and transportation companies subject to regulations by government authority or a mutual fund or investment company registered under the Investment Company Act. Also excluded are securities listed on a national securities exchange or customarily bought and sold at least once a week in the over-the-counter market or in which the employee and/or his or her family have less than \$10,000 invested, at cost or market value, or hold less than one percent of such outstanding securities.

Ethical Standards:

ACICS expects its employees to observe the highest standards of business ethics.

No employee should take any action on behalf of ACICS that they know, or reasonably should know, violates any applicable law or regulation. This obviously includes such activities as bribery, kickbacks, falsehoods, and misrepresentation.

ACICS prohibits all employees from accepting gifts, gratuities, or entertainment from individuals and firms with whom ACICS does business. It is also a violation to give gifts to individuals or firms with whom ACICS does business. Excluded from this prohibition is the exchange of normal business courtesies such as luncheons or dinners, when they are reciprocated or are proper and consistent with regular business practice. Also excluded are advertising or promotional materials and holiday or other gifts, which are of nominal value (less than \$5.00).

Failure to comply with the aforementioned provisions may result in discipline, up to and including termination of employment.

A. Do you or any member of your immediate family hold any "interest" in an "outside business" in such terms as defined above (check only one)?

YES NO

If YES, please describe:

A plan is in place for the management or elimination of potential conflict of interest: YES NO

B. Do you have any other relationships that might reasonably be regarded as creating a possible conflict of interest (check only one)?

YES NO

If YES, please describe:

A plan is in place for the management or elimination of potential conflict of interest: YES NO

C. Have you accepted anything of value, other than what is excluded from this policy, from anyone who does business with ACICS, including independent contractors/evaluators?

YES NO

If YES, please describe:

A plan is in place for the management or elimination of potential conflict of interest: YES NO

In submitting this form, I affirm that I have read and clearly understand the company policy on Conflict of Interest and that the above information is true and complete to the best of my knowledge; and I also accept responsibility for complying with company policies on Conflict of Interest and assume responsibility for updating this disclosure as necessary. I certify that I have read, understand and will comply with the ACICS position on Conflict of Interest.

Full Name

Signature

Date



**INTERMEDIATE
REVIEW COMMITTEE
(IRC)
MANUAL**

IRC MANUAL-REV. 11/19

TABLE OF CONTENTS

| | |
|---|----|
| INTRODUCTION | 2 |
| OVERVIEW OF THE COUNCIL | 2 |
| STAFF | 3 |
| RESPONSIBILITY AND CONFIDENTIALITY | 3 |
| ACICS POLICY ON DISCRIMINATION AND HARASSMENT | 5 |
| PREPARATION FOR A COUNCIL MEETING | 6 |
| INTERMEDIATE FILE REVIEW PROCESS AND OPRESENTATION | 7 |
| Types of Orange Sheets | 9 |
| Motion Letter Canned Language Guide | 10 |
| Recommending an Action | 11 |
| Determining Grant Lengths | 12 |
| Applicants for Initial Grant of Accreditation | 13 |
| Applicants for Renewal of Accreditation | 14 |
| Multiple Applications | 15 |
| GENERAL PROCEDURES AND COUNCIL ACTIONS | 16 |
| Deadlines for Submission of Information | 19 |
| GLOSSARY | 20 |
| APPENDIX A-e | 23 |
| Motion Letter Editing and Formatting | |
| File Review Worksheet Preparation | |
| Deferral, Compliance Warning, Show-Cause | |
| Sample Orange Sheets | |
| Sample Motion Letters | |

INTRODUCTION

This manual has been prepared by staff for members of the Council's Intermediate Review Committee ("IRC"), and is designed to assist IRC members in understanding their responsibilities of the commitment to serve in this capacity. It is neither an official document of the Council nor an official statement of its policies and procedures. The official procedures and standards of the Council are contained in the *Accreditation Criteria* publication.

Included is an outline of the responsibilities of an Intermediate Review Committee member as well as procedures developed by the Council to assist in its quality review of institutions and to help in the effective development of criteria by which those institutions are measured.

As an IRC member, you will be requested to serve as a Committee member to review an institution's application, institutional files, team reports, and responses. The Council is a hard-working and dedicated group. Thus, each supporting assembly, including the Intermediate Review Committee, is expected to assist the Council in meeting its responsibilities.

Please use this manual during your service as an Intermediate Review Committee member. After a review of these materials, if you have questions or need clarification of the Council's procedures, please contact IRC staff for assistance.

We appreciate your commitment to the accreditation review process and your support of the Intermediate Review Committee.

OVERVIEW OF THE COUNCIL

The Accrediting Council for Independent Colleges and Schools ("ACICS" or "Council") is recognized by the Council on Higher Education Accreditation ("CHEA"), and degree-granting institutions accredited by ACICS are eligible for membership in CHEA. CHEA's mission is to serve students and their families, colleges and universities, sponsoring bodies, governments, and employers by promoting academic quality through formal recognition of higher education accrediting agencies. CHEA is the successor organization to the Council on Postsecondary Accreditation ("COPA") and the Commission on Recognition of Postsecondary Accreditation ("CORPA"). ACICS has been a charter member of all three organizations beginning with the founding of COPA in 1975.

Effective July 1, 1993, ACICS became a separate and independent non-profit accrediting agency. The ACICS Bylaws (Appendix A - *Accreditation Criteria*) set forth the structure of the agency. Governance and administration of the affairs of the Council is vested in the Board of Directors.

The Council is charged with the responsibility of receiving applications from institutions desiring accreditation, appointing qualified evaluators, and deciding from all evidence available whether to grant or withhold accreditation from institutions. In addition, the Council is charged with the responsibility, where accreditation is subject to withdrawal or denial, to accord institutions certain procedural guarantees.

The Council makes available to the public current information concerning the criteria, reevaluates at reasonable intervals the accredited institutions, and exercises such other powers as are necessary to carry out the function of an accrediting agency.

The maximum length of a grant of accreditation that an institution may receive is six years. However, the Council may grant accreditation for a shorter period. The grant of accreditation is always for a specific period of time and will expire automatically with the passage of time unless extended by action of the Council.

STAFF

ACICS maintains its office in Washington, D.C. with a full-time staff appropriate for its membership size and scope. Current staff functional responsibilities are maintained and updated as necessary. The position that completes a majority of ACICS visits is the coordinator position. All travel staff attend Council meetings and serve as staff representatives on institutional site evaluations. They are available to assist the Intermediate Review Committee members in reviewing the institutional files and in preparing proposed actions for the consideration of the institution's application or request. Staff, when necessary, also prepares a review of the materials submitted in conjunction with a school's personal appearance before the Council and assist the primary reviewer of a hearing file.

General Counsel for ACICS attends Council meetings as appropriate and serves as a legal resource person for the Council. The general counsel advises the Council on procedures and policy matters and assists in resolving technical questions concerning the actions of the Council.

RESPONSIBILITY AND CONFIDENTIALITY

Each Intermediate Review Committee participant is required to read and abide by the Canons of Ethical Responsibility as adopted by the Council. At the time of service, the participant must complete a new form to assure their continued understanding of the expectations.

The seven Canons of Ethical Responsibility are:

1. An IRC member shall uphold the integrity of the accreditation process.

2. An IRC member shall avoid impropriety and the appearance of impropriety in all activities.
3. An IRC member shall perform the duties impartially and diligently.
4. An IRC member shall refrain from any business activity inappropriate to accreditation responsibilities.
5. An IRC member shall initiate immediately full and open disclosure of any negotiations for or the actual assumption of ownership or control of an institution with which he/she may be directly or indirectly involved.
6. An IRC member shall preserve the confidentiality of the proposed Council action deliberations and of the institutional information to which he/she is privy.
7. An IRC member shall, in representing ACICS, subscribe to the ACICS policy on Discrimination and Harassment in his or her dealings and interaction with the ACICS staff, other members of the committee, or any person affiliated with an institution in his or her capacity as an IRC member. An IRC member is obligated to report to the ACICS President any action that he or she perceives to be discrimination or harassment. (The ACICS Policy on Discrimination and Harassment is disclosed on the following page.)

In adopting the Canons of Ethical Responsibility, the Council has put into words the expectations of those individuals selected to support the Council in its activities.

The Council encourages individuals to assist institutions in improving and upgrading themselves but requires that when significant assistance is provided to an institution, this individual will disclose this fact and refrain from taking part in any file review or proposed action concerning this institution.

During the IRC file review and presentation sessions, a number of topics of discussion will arise and numerous actions will be proposed to the Council. These discussions are open between the IRC participants and staff. However, an IRC member may not disclose these discussions and proposed actions to the membership. Proposed school actions must be kept confidential. The IRC members have a duty and a responsibility to serve all institutions fairly and equally. Staff assigns institutions under review to the Intermediate Review Committee, and in doing so, attempts to distribute them in such a way as to avoid conflicts of interest (i.e., an IRC member will not be assigned an institution located in his or her home state, or an institution where s/he served as a member of the on-site evaluation team). If an IRC member has an interest in an institution or feels that there would be any conflict of interest in his or her review of an institution's file, the IRC member should immediately request, upon review of the assignment sheet, that the institution's file be given to someone else and may wish to refrain from participation in the deliberations concerning the proposed action on the institution's status. As a practice, when the

IRC discusses an institution in which an IRC member has an interest, this individual may be asked to recuse her/himself from the room. Staff will advise when this may be necessary.

IRC members are expected not to inform institutions of the proposed actions following the review session. These actions are proposals to the Council; only the Council has the right to determine the final action on an institution. Institutions will be notified by certified mail of the Council's final action. The institution will receive this official notification within 30 days following the Council meeting. It is expected that should a member institution contact a member of the Intermediate Review Committee, the IRC member will advise callers to contact the ACICS office for appropriate information following receipt of the action in writing.

ACICS POLICY ON DISCRIMINATION AND HARASSMENT

- A) **ACICS does not condone sexual harassment**, which includes the promise or threat, explicit or implicit, that an employee's job status will be affected favorably or unfavorably unless the employee agrees to demands of a sexual nature; unwelcome physical contact or verbal comments; or other activities that create a hostile environment in the workplace. If you believe that you have been subject to sexual harassment, you should report the incident according to the complaint procedures outlined below. No retaliatory action will be taken against any employee who files a complaint.

- B) **ACICS is committed to providing a work environment that is free of discrimination and harassment.** Actions, words, jokes, pictures, or comments that are based on an individual's sex, race, ethnicity, age, religion, or any other legally protected characteristic or that are obscene will not be tolerated. Sexual harassment, whether overt or subtle, is a form of misconduct that is demeaning to another person, undermines the integrity of the employment relationship, and is strictly prohibited.

- C) **Any employee who wants to report an incident** of sexual or other harassment should report the matter to his or her supervisor promptly. If the supervisor is unavailable, or if the employee believes that it would be inappropriate to report the matter to the supervisor, the employee should contact the President/CEO immediately. Employees can raise concerns and make reports without fear of reprisal.

- D) **Any employee who becomes aware** of possible sexual or other harassment of another employee should advise the President/CEO promptly. The President/CEO will handle the matter in a timely and confidential manner.

- E) **The President/CEO or his/her designee** will investigate the complaint promptly. The investigation will include interviews with persons identified by the complainant as having direct knowledge of the harassment. The alleged harasser also will be interviewed. After a thorough investigation, the President/CEO will prepare a written determination regarding the allegations, and copies of the determination will be provided to the complainant and the alleged harasser. Either party may appeal either the decision or the disciplinary action or both to the President/CEO, who will have the final authority.
- F) **Any individual found to have engaged in harassment** is subject to disciplinary action, including discharge where appropriate.

PREPARATION FOR A COUNCIL MEETING

Essentially, there is a three-step process involved at ACICS. These key component steps are the visit, IRC, and Council. Before each Council meeting, the Intermediate Review Committee meets to review institutions scheduled for consideration at the meeting. The Intermediate Review Committee is composed of an outside panel of experienced evaluators, former Commissioners, and the Council travel staff members.

The Intermediate Review Committee meets in Washington, D.C. for a week at a specific time during the month prior to the Council meeting (i.e., March, July, and November). All qualified and designated IRC members will be called upon to participate as needed.

The Committee reviews each file in depth and recommends an action for the Council's consideration. The recommendation is not binding on the Council. The recommendation is not the opinion of a single IRC member; rather it is a collective decision, after the entire Committee has considered the matter. After the IRC session has been completed, the recommendations are prepared as notification letters for the Council.

In scheduling the Intermediate Review Committee, the staff will provide necessary information for the participants to make their travel plans. The staff will make arrangements for the hotel accommodations, but the IRC members are responsible for making their own transportation arrangements. An honorarium of \$250 per day will be provided and all incurred expenses during the week are reimbursed following the IRC session.

INTERMEDIATE FILE REVIEW PROCESS AND PRESENTATION

The review of individual institutions or campuses is conducted by each respective IRC member. Under the direction of staff, individual IRC members will review the institutional files and develop recommended actions for discussion.

The standard procedure involves reviewing the reason that the institution is on the agenda and determining the proposed action to be taken based on the institution's application. Upon review of all relevant materials from the respective campus or institution, the IRC member will then draft the recommended action after completing the following steps:

- From the respective orange sheet, the IRC member should be prepared to have a discussion of the reason that the campus or institution is appearing on the agenda **RA-Renewal of Accreditation (aka NG-New Grant), IG-Initial Grant, QAM: NB-Quality Assurance Monitoring (currently not reviewed by Council)-New Branch, QAM: DE-Quality Assurance Monitoring-Distance Education, QAM:OS- Quality Assurance Monitoring-Out of Scope, QAM:HC-Quality Assurance Monitoring-Higher Credential, QAM:CO-Quality Assurance Monitoring-Change of Ownership, QAM:RV-Quality Assurance Monitoring-Readiness Visit, SP: Special Visit**) to include any notable areas, such as the respective staff that conducted the visit, retention/placement rates, complaint or adverse information, maximum time frame, grant expiration dates, and financial information. This information is also available via the Member Center portal and must be referenced accordingly.
- Cite each finding (from the visit) or area of non-compliance (compliance warning or show-cause directive) (ex. Section 3-1-303 (a)) and discuss what the respective campus or institution has supplied as part of their response.
- In review of all relevant materials (team report, campus or institutional response, catalog, and other information), the IRC member should be able to determine whether the area of non-compliance has been resolved, unresolved, or requires more information.
- For all applicable areas of non-compliance that the campus or institution has not resolved, the IRC member should formulate language using the Canned Language from the Commissioner Portal **as a guide** (<https://membercenter.acics.org/sites/commission>) to thoroughly explain the appropriate action(s) that need to be taken in order to come into compliance.

*This language should be drafted within the orange sheet's **NEEDED** section and carried over to the draft motion letter.*