

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-110

**ACICS EMPLOYEE AGREEMENT
CONFLICT OF INTEREST**

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 Vice President of Administration.

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Ethical Standards:

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

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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:

- 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:

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- 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

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2/3/16

DATE

André McDuffie

EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

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1/29/2016
DATE

CATHY LOUKO
EMPLOYEE NAME

(b)(6)
EMPLOYEE SIGNATURE

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12/15/10
DATE

Karly Smith
EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

PHOTO RELEASE FORM

I hereby grant permission to Accrediting Council for Independent Colleges and Schools (ACICS), to take and use: photographs and/or digital images of me for use in news releases and/or educational materials. These materials might include printed or electronic publications, Web sites or other electronic communications. I further agree that my name and identity may be revealed in descriptive text or commentary in connection with the image(s). I authorize the use of these images without compensation to me. All negatives, prints, and digital reproductions shall be the property of ACICS.

Circle one:

I do grant my permission

I do not grant my permission

(b)(6)

Employee signature

12/15/10

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1/27/16
DATE

Katie Morrison
EMPLOYEE NAME

(b)(6)
EMPLOYEE SIGNATURE

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02/01/14

DATE

Roxanne Hay Rappo

EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

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May 1, 2018
DATE

Lajoya T. Boyd
EMPLOYEE NAME

(b)(6)
EMPLOYEE SIGNATURE

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Jan. 27, 2016
DATE

Linda J. Lundberg
EMPLOYEE NAME

(b)(6)
EMPLOYEE SIGNATURE

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7/30/17

DATE

Michelle Edwards

EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

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- 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:

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.

02.01.2016

DATE

Perliter Walters-Gilliam

EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

**ACICS EMPLOYEE AGREEMENT
CONFLICT OF INTEREST**

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 Vice President of Administration.

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:

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:

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:

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.

2/1/2016
DATE

Shaniqua Smith
EMPLOYEE NAME

(b)(6)
EMPLOYEE SIGNATURE

ACICS EMPLOYEE AGREEMENT CONFLICT OF INTEREST

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 Vice President of Administration.

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.

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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:

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:

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:

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.

1/27/16

DATE

Stevie Gelford

EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

ACICS EMPLOYEE AGREEMENT CONFLICT OF INTEREST

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 Vice President of Administration.

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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:

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:

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:

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.

1 FEB 2014

DATE

Terri Ann Jensen

EMPLOYEE NAME

(b)(6)

EMPLOYEE SIGNATURE

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-111

July 12, 2017

To whom it may concern:

I, Charles C Baldwin, Jr. represent and warrant that I have no other interest that will conflict with the duty to perform any services as stipulated, and I will not permit conflicts to arise that, explicitly or implicitly, call into question the independence and integrity of the consulting work.

I do provide accounting support to ACCSC, ABHES and DEAC, but I do not believe these duties present any conflicts of interest and/or impede my independence or integrity of the services provided to ACICS.

(b)(6)

Charles C Baldwin Jr.

Case Name: *In the Matter of* Accrediting Council for
Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent
Colleges and Schools

Exhibit No.: B-O-112

Accrediting Council for Independent Colleges and Schools

CONTRACTOR AGREEMENT

This document outlines an agreement made on 05/07/18 between Accrediting Council for Independent Colleges and Schools ("ACICS"), a nonprofit organization maintaining offices at 750 First Street NE, Suite 980, Washington DC 20002-4223, and Julie Euliano (the "Contractor") hereby agree as follows:

1. The Contractor is hereby engaged to perform the following services:
Financial Services
2. The services shall commence when this agreement is signed by both parties. This contract renews annually unless canceled by either party.
3. The Contractor will report to VP of Operations and will consult with others as she shall designate.
4. The Contractor acknowledges that the services to be performed are assigned solely to that contractor, and the Contractor will not delegate or subcontract these services.
5. The Contractor shall be compensated in the amount of _____ Travel time will be paid at the same rate.
6. The Contractor will not be reimbursed for office expenses or equipment. The Contractor will be reimbursed for other expenses only if they are approved by ACICS in writing in advance. The only exception is expenses related to tasks directed by ACICS.
7. The Contractor acknowledges that confidential and proprietary information will be disclosed by ACICS during the term of this consulting agreement, and s/he agrees to use that information solely for providing the services described herein unless otherwise authorized in writing in advance by ACICS. The Contractor will take reasonable care to prevent unauthorized disclosure of the information by others and will promptly notify ACICS of any possible unauthorized disclosure.
8. The Contractor acknowledges that ACICS is engaged in a continuous program of review, research, development, production and marketing and that s/he may make new contributions of intellectual property of value to ACICS in the course of performing consulting services. The Contractor will promptly disclose any such new intellectual property to ACICS and will otherwise maintain all information regarding it in confidence. The Contractor acknowledges that all such intellectual property shall be the sole property of ACICS, and s/he agrees to assign and does assign all right, title and interest in it to ACICS or as ACICS may direct.
9. The Contractor represents and warrants that s/he has no other interest that will conflict with the duty to perform these services as stipulated, and s/he will not permit conflicts to

arise that, explicitly or implicitly, call into question the independence and integrity of the consulting work.

10. The Contractor is an independent contractor rendering professional services pursuant to this agreement, and there is no employment, joint venture, partnership or other relationship between the parties. No employment is offered
11. Notices pursuant to this agreement shall be made by email as follows and shall be effective when received:

to ACICS: amcduffie@acics.org

with a copy to: medwards@acics.org and sgelfound@acics.org

to Contractor: _____

12. This agreement is in lieu of any, and all, other agreements and shall be governed and construed in accordance with the law of Washington, DC without giving effect to conflict of law provisions.
13. This is the entire agreement of the parties.

ACICS:

Contractor:

(b)(6)

by: Michelle L. Edwards
title: President and CEO

date: 5/7/18

date: 05/07/18

Accrediting Council for Independent Colleges and Schools

CONTRACTOR AGREEMENT

This document outlines an agreement made on May 3rd 2018 between **Accrediting Council for Independent Colleges and Schools (“ACICS”)**, a nonprofit organization maintaining offices at 750 First Street NE, Suite 980, Washington DC 20002-4223, and Katy Fisher (the “Contractor”) hereby agree as follows:

1. The Contractor is hereby engaged to perform the following services:
Accounting Services to assist ACICS in performing the month-end close process to include reconciliations, schedules, and making adjustments to the accounting records as necessary. Contractor will compile an unaudited Balance Sheet and Statement of Activities for internal use using ACICS software.
2. The services shall commence when this agreement is signed by both parties. This contract renews annually unless canceled by either party.
3. The Contractor will report to VP of Operations and will consult with others as s/he shall designate.
4. The Contractor acknowledges that the services to be performed are assigned solely to that contractor, and the Contractor will not delegate or subcontract these services.
5. The Contractor shall be compensated in the amount of
6. The Contractor will not be reimbursed for office expenses or equipment. The Contractor will be reimbursed for other expenses only if they are approved by ACICS in writing in advance.
7. The Contractor acknowledges that confidential and proprietary information will be disclosed by ACICS during the term of this consulting agreement, and s/he agrees to use that information solely for providing the services described herein unless otherwise authorized in writing in advance by ACICS. The Contractor will take reasonable care to prevent unauthorized disclosure of the information by others and will promptly notify ACICS of any possible unauthorized disclosure.
8. The Contractor acknowledges that ACICS is engaged in a continuous program of review, research, development, production and marketing and that s/he may make new contributions of intellectual property of value to ACICS in the course of performing consulting services. The Contractor will promptly disclose any such new intellectual property to ACICS and will otherwise maintain all information regarding it in confidence. The Contractor acknowledges that all such intellectual property shall be the sole property of ACICS, and s/he agrees to assign and does assign all right, title and interest in it to ACICS or as ACICS may direct.

- 9. The Contractor represents and warrants that s/he has no other interest that will conflict with the duty to perform these services as stipulated, and s/he will not permit conflicts to arise that, explicitly or implicitly, call into question the independence and integrity of the consulting work.
- 10. The Contractor is an independent contractor rendering professional services pursuant to this agreement, and there is no employment, joint venture, partnership or other relationship between the parties. No employment is offered.
- 11. Notices pursuant to this agreement shall be made by email as follows and shall be effective when received:

to ACICS: amcduffie@acics.org

with a copy to: medwards@acics.org and sgelfound@acics.org

to Contractor:
- 12. This agreement is in lieu of any, and all, other agreements and shall be governed and construed in accordance with the law of Washington, DC without giving effect to conflict of law provisions.
- 13. This is the entire agreement of the parties.

ACICS:

Contractor:

(b)(6)

by: Michelle L. Edwards
title: President and CEO

Email

date: 5/3/18

date: 05/03/18

Accrediting Council for Independent Colleges and Schools

CONTRACTOR AGREEMENT

This document outlines an agreement made on 11/3/2017 between Accrediting Council for Independent Colleges and Schools ("ACICS"), a nonprofit organization maintaining offices at 750 First Street NE, Suite 980, Washington DC 20002-4223, and Winston Howard (the "Contractor") hereby agree as follows:

1. The Contractor is hereby engaged to perform the following services:
Accounting Services
2. The services shall commence when this agreement is signed by both parties. This contract renews annually unless canceled by either party.
3. The Contractor will report to VP of Operations and will consult with others as s/he shall designate.
4. The Contractor acknowledges that the services to be performed are assigned solely to that contractor, and the Contractor will not delegate or subcontract these services.
5. The Contractor shall be compensated in the amount of
6. The Contractor will not be reimbursed for office expenses or equipment. The Contractor will be reimbursed for other expenses only if they are approved by ACICS in writing in advance.
7. The Contractor acknowledges that confidential and proprietary information will be disclosed by ACICS during the term of this consulting agreement, and s/he agrees to use that information solely for providing the services described herein unless otherwise authorized in writing in advance by ACICS. The Contractor will take reasonable care to prevent unauthorized disclosure of the information by others and will promptly notify ACICS of any possible unauthorized disclosure.
8. The Contractor acknowledges that ACICS is engaged in a continuous program of review, research, development, production and marketing and that s/he may make new contributions of intellectual property of value to ACICS in the course of performing consulting services. The Contractor will promptly disclose any such new intellectual property to ACICS and will otherwise maintain all information regarding it in confidence. The Contractor acknowledges that all such intellectual property shall be the sole property of ACICS, and s/he agrees to assign and does assign all right, title and interest in it to ACICS or as ACICS may direct.

- 9. The Contractor represents and warrants that s/he has no other interest that will conflict with the duty to perform these services as stipulated, and s/he will not permit conflicts to arise that, explicitly or implicitly, call into question the independence and integrity of the consulting work.
- 10. The Contractor is an independent contractor rendering professional services pursuant to this agreement, and there is no employment, joint venture, partnership or other relationship between the parties. No employment is offered
- 11. Notices pursuant to this agreement shall be made by email as follows and shall be effective when received:

to ACICS: amcduffie@acics.org

with a copy to: medwards@acics.org and sgelfound@acics.org

to Contractor: _____

- 12. This agreement is in lieu of any, and all, other agreements and shall be governed and construed in accordance with the law of Washington, DC without giving effect to conflict of law provisions.
- 13. This is the entire agreement of the parties.

ACICS:

Contractor:

(b)(6)

by: Michelle L. Edwards

title: President and CEO

date: 11/3/17

date: 11/3/17

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-113

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM: Accrediting Council for Independent Colleges and Schools
DATE: June 29, 2012
SUBJECT: Final Criteria and Other Information

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I. FINAL CRITERIA REVISIONS

In June 2012, the Council reviewed specific areas of the ACICS *Accreditation Criteria* outlined in Section I. The language contained in Section I was previously reviewed by ACICS constituents or reflects a clarification of previously approved criteria.

The Council has updated the respective sections of the *Accreditation Criteria* to reflect all final criteria revisions. To obtain a current copy of the *Accreditation Criteria*, please visit our Web site at www.acics.org. The *Accreditation Criteria* can be found in the **Publications** section of the Web site.

The following criteria were previously reviewed and unless otherwise noted, have been accepted as **final, effective immediately** (new language is underlined, ~~deleted language is struck~~):

A. DUE PROCESS

Explanation of Changes

The Council has approved final language revisions to clarify its due process policies as described in the Accreditation Criteria. These changes will allow ACICS to demonstrate to the U.S. Department of Education that its due process regulations and protocols balance the need for due process protections with the expectation that institutions or programs found to be out of compliance by the Council are blocked, in a timely manner, from continued access to federal student financial aid.

2-3-300 - ACCREDITATION DENIED

Denial of an accredited status is characterized by the Council as a “withholding” action and is differentiated from suspension of accreditation, which is a “withdrawal” action. There are two levels of denial. One totally withholds accreditation of the institution or a branch; the other denies approval of a requested substantive change. Denial at either level constitutes a negative action and is challengeable by the institution. The process of challenge, however, is different for each level of denial as separately described in Sections 2-3-301, 2-3-302, and 2-3-303. In all cases of denial, the Council will give the institution written reasons for the denial, which are subject to modification through the appeals processes as later described and explained. Denial actions that are not appealed in accordance with the appeals procedures provided by the Council are considered final actions.

2-3-301. Denial of Initial Grant. An institution that objects to a Council decision to deny an application for an initial grant of accreditation has the right and will be given the opportunity to present its case and to be heard at the next meeting of the Review Board.

At such a hearing, the institution may not present new evidence for consideration and must follow the procedures described in Section 2-3-600.

2-3-302. Denial of New Grant, Branch Inclusion, or Change of Ownership/Control. An institution that objects to a Council decision to deny an application for a new grant of accreditation, inclusion of a branch campus, or reinstatement of accreditation following a change of ownership or control has the right to appeal the decision to the Review Board pursuant to the procedures described in 2-3-604. ~~and will be given the opportunity to present its case and to be heard pursuant to the hearing procedures described in Section 2-3-500.~~

2-3-500 - COUNCIL HEARING PROCEDURES

The following procedures will govern hearings to be held before the Council:

(a) The request for a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the ~~denial action or show-cause directive~~. The request for a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the request for a hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing, including the dates by which the institution must submit its response to the ~~findings of the denial action or show-cause directive~~. ~~In all cases, the interval between the negative or conditioning action of the Council and the subsequent action of the Council based on the hearing of the institution's appeal shall not exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.~~

2-3-501. Hearing Format. Hearings before the Council resulting from a ~~denial motion or~~ a show-cause directive and involving areas of noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A hearing panel will be designated by the Council to hear the presentation of the institution. The panel will present its findings and its recommended action to the full Council, which will make the final decision in a timeframe not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.

ARTICLE VII

Appeals Process

Section 2-Due Process. Criteria promulgated by the Council shall ensure that institutions are provided a fair and reasonable opportunity to present reasons through an appeals

process why denial, suspension, withdrawal, or other final actions taken by the Council are inappropriate and should be remanded for further consideration. The due process provided is ~~not required to be a full hearing on the record or before the full Council~~ an appeal to the Review Board, pursuant to the procedures described in 2-3-604. ~~However,~~ All appeals to the Review Board for Appeals shall be on the record and shall provide for the submission of briefs and oral testimony by institutional representatives.

B. TEAM SELECTION, COMPOSITION STANDARDS AND CENTRALLY CONTROLLED INSTITUTIONS

Explanation of Changes

The Council approved minor edits to terminology in the Accreditation Criteria to ensure consistency with its Bylaws in the definition of academic, administrative and public representatives. These changes will not impact the current procedures for vetting qualified team members as subject specialists or as having an expertise in distance education. Additionally, the terminology changes include the use “centrally controlled” to replace “distributed enterprise” throughout the Accreditation Criteria.

2-1-401. Selection of Team Members. Evaluators are selected from among educators, executives, and practitioners in business, administrative, and technical fields, and from state departments of education and other evaluation and approval bodies. The person designated as chair of the team ~~always will be an~~ is experienced in management and is responsible ~~person who has responsibility~~ for assuring that the visit is conducted fairly and thoroughly.

2-1-402. Composition of Teams. The size and qualifications of the team are determined at the discretion of the Council based on the type and size of the institution, the type and number of programs being offered, the mode of educational delivery, location of the campus, student enrollment, credentials offered, and other special circumstances such as visits to centrally controlled academic administrative centers. ~~Full-team on site evaluation visits Teams conducting evaluations~~ will consist of individuals serving as academic, administrative, public or member representatives as defined in Appendix A - Bylaws. ~~at least one person from another ACICS-accredited institution and at least one person who does not represent an ACICS-accredited institution, at a minimum. Additional team members will be named as needed and at the Council’s discretion based on the student enrollment and the credentials offered by the institution, or to serve as subject specialists to evaluate specialized programs. Teams conducting evaluations of distributed enterprise administrative centers will also include members experienced in and trained to evaluate academic and other administrative control systems for relevant functions. The Council makes a conscious effort to send visitors who have had experience in an institution offering and awarding similar academic credentials.~~

The application forms and the completed self-study will be supplied to members of the visiting team for review prior to the visit and for use during the visit.

2-1-404. Staff Member on Visit. A member of the ACICS staff accompanies teams on all visits. In the event that an ACICS staff member is unable to accompany a team on a visit, the use of a qualified and trained contractor may be used as the ACICS staff representative on the visit. The ACICS staff representative is responsible for assuring that comparability is achieved from visit to visit and from institution to institution. The same ACICS staff representative who accompanies a team also is available when ACICS deliberates and may be asked questions about what was observed and reported by the team during the visit.

2-1-501. Scope of Visit. The scope of a visit will depend on the location, operation, size, program offerings and classification of the institution. For a multiple campus institution, the main campus and all additional locations are subject to evaluation, either in conjunction with the main campus or separately. ~~For a distributed enterprise, a representative sample of campuses will be selected, at the discretion of the Council, for visits at reasonable intervals. This sample will generally include a minimum of 50% of the campuses included within the distributed enterprise, and at least a minimum of three campuses. Council reserves the right to increase the number of campuses to be visited, based upon factors such as retention and placement rates, reporting status, complaints and adverse and any other pertinent information. Visits will also be conducted to the academic administrative center of a distributed enterprise and any affiliated locations of the administrative system.~~

2-1-503. Procedures. Institutions are provided in advance with a checklist of materials and documents that should be current and readily available for review by the team. Prior to the visit, institutions are required to update the self-study where significant changes have occurred since its submission to ACICS. Teams visiting an academic administrative center will generate a report that will be shared with teams conducting visits to the individual campuses within the centrally controlled structure. ~~the campuses of a distributed enterprise will be provided with a copy of the team report from the visit to the academic administrative center.~~

During the visit, institutions are expected to make provisions for adequate consultation between team members and the faculty, administrative staff, and students and chief onsite administrative officer ~~academic officer~~. Teams visiting the campuses of a distributed enterprise are expected to consult with the institution's chief academic officer. Some teams also may want to consult with the institution's board of directors or trustees and community leaders or employers.

The team prepares a written report that covers each area reviewed at the institution and includes other information pertinent to an accurate evaluation. The report subsequently is sent by the team chair to ACICS.

An exit conference is conducted at the conclusion of the visit and is attended by the chief executive or administrative officer of the institution and any others designated by the chief executive officer. During the session, the chair of the team will summarize the

evaluation team's findings. Members of the team also may append to the report ~~suggestions~~ recommendations for institutional improvement, ~~but such suggestions are not a part of the official team report later considered by ACICS.~~ The visiting team is not a decision making body.

2-1-601. Opportunity to Respond. The ACICS office sends a copy of each evaluation team report to the designated representative at the centrally controlled academic administrative center or of a distributed enterprise, to the chief on-site administrator of the respective multiple or single campus institution. ~~of a multiple campus institution and to the chief on-site administrator of a single campus institution.~~ These individuals are invited to respond to it in writing within the specified time frame

2-1-602. Intermediate Review. All materials pertinent to an institution's accreditation are reviewed by experienced persons before being reviewed by the Council. These materials include, but are not limited to, the institution's self-evaluation report(s), the visiting team report(s), the institution's response(s) to the team report, financial records of the institution (which are not examined by the evaluation team), ~~the institution's current catalog(s),~~ and any official reports from state or federal regulatory bodies.

~~This group~~ The Intermediate Review Committee (IRC) upon intensive review of institutional files, ~~makes~~ will make a recommendations to the Council of possible accreditation action. ~~to ACICS if the evaluation file is complete. If the file is not complete, the reviewers will organize facts for ACICS but will not make a specific recommendation. The Council has the option of postponing examination of files that are incomplete at the time of the intermediate review, even if subsequent information has been received by the time ACICS meets.~~

2-1-603. Council Review. All materials collected during the evaluation process are reviewed by the ACICS Council. Only the Council can take a final accreditation action.

II. FOR INFORMATION

A. PROPOSED REVISIONS TO STUDENT ACHIEVEMENT STANDARDS

Explanation of Changes

*The Council intends to use the occasion of its re-recognition by the U.S. Department of Education as an opportunity to establish, articulate and implement a new set of expectations for member institutions, specifically in the areas of student achievement and success. Although these expectations are set in order to implement the Accreditation Criteria, **the Council invites members to comment on these proposals, especially to identify relevant qualitative factors.** There are three sets of changes proposed below: (1) Benchmark standards to remain in good standing, (2) Compliance standards to retain accreditation, and (3) Qualitative and mitigating factors to demonstrate student success.*

1. *Benchmark Standards – Campus-level benchmarks for student retention, placement, and licensure (where appropriate) are currently set at 67%, 64%, and 60%, respectively. The Council intends to align these benchmarks with those established by other national accreditors, which are nearly all at 70%. One exception will be the ACICS benchmark for retention of students in programs that are more than one year in length, which will be set at 65% in recognition of the large number of degree-granting institutions in the ACICS membership compared to the membership of other national accreditors and the additional risk of withdrawal associated with the longer programs. Campuses falling below the 70% benchmark will be required to submit monitoring reports and may be subject to other restrictions, while both campuses and programs below the benchmarks will be required to develop improvement plans. In some cases, participation in workshops or consultations may be required.*
2. *Compliance Standards – The minimum retention, placement and licensure standards for compliance are currently at 52%, 47% and 40%, respectively. However, the Council believes that ACICS accreditation should mean that a majority of the graduates from career education programs are able to find employment related to their field of study and thus to service their student loan debt. In today's economic and political environment, these current compliance standards are no longer acceptable. To ensure a minimum level of student success, ACICS is setting each of these standards, for both the campus and program levels, at 60%. Campuses and programs whose performance falls below this level must come into compliance within established timeframes. Otherwise, accreditation of the campus or approval of the program will be subject to withdrawal.*

3. *Qualitative and Mitigating Factors* – ACICS recognizes that for evaluation of a campus or program to be comprehensive and reasonable, qualitative factors and mitigating circumstance must be taken into consideration. Therefore, as part of the annual Campus Accountability Reporting (CAR) process, ACICS proposes to invite members to submit information describing local economic and demographic conditions, trends in institutional performance, operational constraints and other circumstances that provides a more complete demonstration of student success.

PROPOSED QUANTITATIVE STANDARDS

Proposed Student Achievement Standards To Be Implemented Based on the 2013 Campus Accountability Report				
Campus Level Standards				
	Retention		Placement	
Benchmark	70%		70%	
Compliance	60%		60%	
Program Level Standards				
	Retention		Placement	Licensure ^{1,2}
	Tier 1 - Program Length =<1 year	Tier 2 - Program Length >1 year		
Benchmark	70%	65%	70%	70%
Compliance	60%	60%	60%	60%

¹ Where licensure is required for employment.

² Programs must also meet any applicable state or national pass rate standards.

PROPOSED QUALITATIVE STANDARDS

The Council has expressed expectations regarding economic, demographic, operational and other mitigating circumstances under which institutions may be given additional consideration regarding their student achievement metrics. These circumstances include:

- Weak national economic conditions, such as during an economic recession or depression
- Weak local or regional considerations, such as persistence of high unemployment, low economic rates of growth, or extended employer time to hire
- Demographic conditions, such as large numbers of students with multiple risk factors identified by the U.S. Department of Education in “Students Entering and Leaving Postsecondary Occupational Education 1995-2001. According to Berkner, Cuccaro-Alamin and McCormick, 1996, these factors include:
 - Delayed enrollment after high school graduation
 - Lacking a high school diploma
 - Enrolling on a part-time basis
 - Financially independent
 - Working full-time while enrolled

- Having children younger than age 19, and
- Being a single parent
- History of Student Achievement outcomes, such as a single episode of low rates compared to a sustained pattern of marginal or declining performance
- Having at least six months after graduation or licensure, where applicable, to search for employment
- Significance of program(s) for viability of the campus
- Numbers of students enrolled or graduated
- Other mitigating circumstances unique to the institution.

B. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Tuesday, July 17, 2012**. All other materials for review during the August 2012 Council Meeting should be submitted by **Friday, July 13, 2012**.

C. ACICS AWARE WEBINARS

The AWARE webinar will be held on **Tuesday, July 10, 2012**. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Ms. Terron Sales at tsales@acics.org.

III. COMMENT FORM – PROPOSED CRITERIA REVISIONS

ACICS ID Code: _____ Date: _____

Name of
Organization: _____

Address : _____

Please check (as appropriate):

Proposed *Accreditation Criteria* revisions:

- Program-Level Standards

Accept as Written Modify (please explain)

Prepared by: _____

Title: _____

Signature: _____

Please respond by Tuesday, July 17, 2012 to:

Ms. Terron Sales
Manager of Policy & Institutional Review
Accrediting Council for Independent Colleges and Schools
750 First Street, NE, Suite 980
Washington, DC 20002-4241
Fax (202) 842-2593
fieldcomments@acics.org

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-114

Meeting Minutes

The meeting was called to order at 8:56am by Chair Euliano. A special welcome was extended to the new commissioner, Ms. Michelle Edwards, a replaced appointed member. Dr. Gray welcomed the group as well as set the tone for the discussion to take place during the meeting. The topics for discussion were researched by ACICS staff for the Council's consideration. This is intended to provide some background and context for the review.

Dr. Gurubatham, by way of refreshing the minds of the group, summarized the "Typical Policy Development and Implementation Plan" (Tab 1, Page 1) that was approved by the Council in December 2014. The increased number of policy issues over the years had resulted in the quick review and approval of policy items that became a bombardment of criteria to the membership. The intent of the Plan is to return to the original intent of the meeting which is to discuss challenges and policy ideas prior to developing any revisions to policy and to also give the membership a greater opportunity to review, digest, and provide feedback. Hence, at this meeting, no decision will be made.

GAO Report Summary

Dr. Gray and Mr. Bieda shared feedback on the GAO Report.

Balogh recommended including a challenge to the matrix used to evaluate the report's conclusions.

Euliano asked if CDR and 90/10 should be a violation of Criteria. Given that the two are second and third layer consequences that are not directly related to other evidences of quality assurance, that knee-jerk reaction is not representative of the process employed by ACICS.

Rivera theorizes that the Department would like the accreditors to serve as part watchdog in areas where the resources are limited. Bieda suggests that the ultimate motivation is to neutralize having the accreditation process conducted by independent bodies and return to oversight by the Department of Education, similar to other countries (accreditation is generally provided by Ministries of Education).

Euliano asked if we should focus our policy discussions on those quality assurance components that are within our purview – graduation, placement, retention.

Llerena commented on the definition of success from the accreditors and the government – return on investment versus "churn" (how many students have to be admitted to result in one successful placement).

February 24-27, 2015 Policy Discussion Items

San Juan, Puerto Rico

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
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TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
<p>Defensible outcomes in recruitment, admissions, communications and public disclosures (Tab 1, Page 2)</p>	<p>Staff felt that all related standards should be considered for possible revision, augmentation, and clarity.</p> <p>There are about 12 discrete sections of the Criteria that deal with these areas. Do we have sufficient number of stringency to deal with the issues that have surfaced? Table 1 summarizes the current language that is housed in the Criteria that may or may not be sufficient or appropriate but it is important to evaluate the current inventory prior to making consideration for changes.</p> <p>The enrollment agreements are being used by AGs as the primary document for determining disclosure, for example.</p> <p>Because the use of enrollment agreements only became required a few years ago, the use of that document as the primary indicator of disclosure is not appropriate.</p>	<p>Creation of appendix on consolidated disclosures?</p> <p>In-depth review of complaints for follow up?</p>	

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Institutional and management integrity – misrepresentations in general (Tab 1, Page 6)	Ethical practices as well as effectiveness and efficiency of management are interwoven together in these criteria.		No action

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
<p>Periodic/interval/special visits and reviews</p>	<p>Unannounced visits have qualifications – adverse and general ops</p> <p>FACT visits also must have a basis for review.</p> <p>*****</p> <p>OPTION I:</p> <p>Initial grant recipients and multiple deferral campuses receive a short grant anyway.</p> <p>OPTION II:</p> <p>Staff would develop a proposal on how to systematically review websites for improper disclosures</p> <p>OPTION III:</p> <p>As an accreditor we should have the authority to go to the school at any time to evaluate compliance.</p>	<p>OPTION II</p> <p>Once there is conflict with Criteria, what would be the follow up? Staff or Council review?</p> <p>OPTION III</p> <p>Additional research on the review process for the right to do that.</p> <p>Develop process for actually doing that based on percentage for evaluation. Small team to focus on specific items, etc...</p> <p>OPTION IV</p> <p>Procedure already in place for complaints that should result in an unannounced visit.</p>	<p>OPTION I:</p> <p>No action</p> <p>OPTION II</p> <p>Draft procedural language for review in April concerning web site and other online advertising/publication materials and periodic, off site reviews.</p> <p>OPTION III</p> <ul style="list-style-type: none"> • Draft criteria revision language to give Council the right to conduct visits. • Conduct additional research concerning a procedure for periodic, systematic review. <p>OPTION IV</p> <p>Criteria with definition of a FACT visit as well as procedural changes</p>

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Admission and recruitment monitoring	<p>There is a level of distrust with the current limitations of the evaluation process around recruitment. Options I and II may be an exercise in futility to get to the heart of the matter of ethics in recruitment practices.</p> <p>Possible criteria changes would be more public relations driven rather than any new component of the evaluation process.</p> <p>*****</p> <p>There are some assumptions for students who have graduated from high school versus ATB students which justifies the additional review during the admissions process.</p> <p>In some places, assessment tests are required but schools should already be doing this evaluation.</p> <p>*****</p>	Review of procedures concerning the on-site evaluation of recruitment.	<p>Massage current criterion 3-1-412(a) concerning inclusion of third-party review.</p> <p>Revise language that focuses only on ATB to include all students.</p> <p>Review against the CEP will be a procedural effect of the above...</p>

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Disclosure of performance information	<p>DE template has specific requirements about disclosure at using the OPEID number of an institution. Hence rates have to be reported as an aggregate to the Department, while not being representative of the performance at the campus level.</p> <p>Revising the requirement to be at the campus level may be an additional burden to the campus and more confusing to the student.</p>	Review the DE template and its requirements as well as determine how best to the guide the campuses through revised disclosure.	Draft revision language
Strategies to enhance participation from students, faculty and employers in the systematic review process	<p>Inclusion of faculty, students, and employers in the systematic review process.</p> <p>Use multiple sources to get access to feedback from stakeholders.</p>	<p>Use PVP system to survey employers and graduates – multiple emails from ACICS may be harassment.</p> <p>Systematic Review Advisory Committee composed of students, graduates, employers, and faculty, should be developed.</p>	Draft procedure for Committee
Faculty field preparation – non-degree program			

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Faculty assignments		Why do we even have applied general education? Either general education or not gen education.	
Library budget			
Library use and accessibility	ACICS may be behind in the changes in the library industry and the areas need major overhaul concerning resources	Research academic preparation – BLS versus MLS – as well as include other credentials that may be appropriate.	Ad hoc committee: Seth, John, Jeanne, Ed, Joseph, and Terron
Library holdings			
Glossary of definitions, lecture			
Glossary of definitions, home institution, host institution, and education or study abroad			
Waiver of prerequisites	Waiving the prerequisites should be done systematically and with documentation. However, this defeats the intent of educational quality.		Take no action.

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Substitution of equivalent courses – institutional flexibility	<p>Potential for misrepresentation of program offerings as promoted to students.</p> <p>A la carte courses do not make up a curriculum which may be controlled by the student or the institution.</p>		Take no action.
Quality and scope of access to vital services at all campus sites	<p>Risk around safety and security of students/faculty without administrator.</p> <p>Clery Act around harassment onsite...</p> <p>Quality of education and oversight of activities</p> <p>Potential for misrepresentation</p> <p>According to current criteria, only the onsite administrator is the only individual who needs to be onsite.</p>		
Teaching load for non-degree and occupational degree programs	Distinction between “32” and “reasonable” at the various credentials should be reviewed based on expectations of the faculty member.		Draft language for review.

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Institutional signage	<p>Have there been student complaints? What about expectations from the Department?</p> <p>Signage does not include the formal name of institution as approved by ACICS and should.</p>		Take no action.
Show-cause directive	SUE		
Policies affecting international institutions- comprehensive review of <i>Criteria</i>	Can there be standards just for international schools? Since they don't accept Title IV funds what is the harm?	Larry, Miguel, John, Linda, LaShondra	
Campus and Institutional Effectiveness Plan	Level of prescription of language and expectations – quarterly progress reports?		
Qualifications of on-site administrators			
Safety and protection of basic records			
Faculty meetings			
Community resources			

TOPIC	GENERAL DISCUSSION / NOTES	AREAS REQUIRING FURTHER RESEARCH	COUNCIL'S EXPECTATION FOR APRIL
Determination of equivalency of non-US transcripts and credentials			Policy Decision item in August



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties

FROM: Accrediting Council for Independent Colleges and Schools

DATE: May 13, 2015

The Memorandum to the Field contains final criteria and other information for ACICS-accredited institutions and other interested parties.

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ACICS MEMORANDUM TO THE FIELD

May 13, 2015

I. FINAL CRITERIA REVISIONS

At its April 2015 meeting, the Council reviewed specific areas of the *ACICS Accreditation Criteria*. The language contained in this section was previously reviewed by ACICS constituents or reflects a clarification of previously approved criteria.

The Council has updated the respective sections of the *Accreditation Criteria* to reflect all final criteria revisions. To obtain a current copy of the *Accreditation Criteria*, please visit our Web site at www.acics.org. The *Accreditation Criteria* can be found in the **Publications** section of the Web site.

The following criteria were previously reviewed and, unless otherwise noted, have been accepted as **final, effective immediately** (new language is underlined, ~~deleted language is struck~~):

A. DEFERRAL WORKSHOP

Explanation of Final Changes

The Council approved final language that may require participation in a workshop and/or consultation for institutions whose accreditation has been deferred.

2-3-200 Accreditation Deferred

When Council determines an institution is measured against the criteria and is found to be in marginal compliance, ~~or there is insufficient evidence available for the Council to make a decision, ACICS may~~ they may defer action until a later date pending receipt of additional information. In such cases, ~~ACICS~~ the Council will provide in writing the reasons for the deferral, state what the institution needs to provide, sufficient time for the institution to respond and ~~invite a response to the findings by a specify~~ the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, “no action at this time” and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on reevaluation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed, including time for procedural due process following the Council’s review of the information not to exceed twelve months, if the longest program is less than one year in length; eighteen

May 13, 2015

months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.

B. DEBARMENT POLICY

Explanation of Final Changes

The Council proposes to strengthen and clarify language concerning reasons that may lead to debarment as well as who may be debarred.

2-3-1000 – Debarment

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-401, from being an owner, ~~or senior administrator~~ manager, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior, was debarred by a government agency or an accrediting agency, or was an owner, or manager senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

The Council will notify ~~the a person, or person(s)~~ or entity whom it intends to bar as the result of denial or suspension action within four months following the loss of the institution's accreditation. It will notify ~~the a person, or person(s)~~ or entity whom it intends to bar as the result of the closing of an institution within a reasonable period of time following the closure, ~~normally not more than six months following the closure of the institution.~~ In each case, the Council will forward an intent to bar notice by both ~~express~~ electronic and ~~first class~~ certified mail to the last institutional mailing address known to the Council, unless the Council has received updated mailing information following the institution's closure or loss of accreditation. Those individuals or entities will be considered notified when the Council has forwarded the intent to bar notice in accordance with these procedures.

The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing ~~or in person~~ to challenge the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to challenge the intent to bar, the person(s) or entity must inform the Council office in writing within ten days of receipt of the notice as to ~~whether they desire a personal appearance before the~~

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~~Council, or whether they will challenge the intent to bar in writing. A debarment order may be issued by the Council as a result of its consideration of the facts presented. Notice of the Council's decision will be sent to the individual(s) by electronic and first-class certified mail within ten days following their challenge before the Council.~~

The Council retains final discretion to establish the terms and length of the debarment. The length of debarment will vary depending on the circumstances that led to the debarment decision, but it typically will be for a period of at least one year and not more than three years. Individual circumstances may justify a longer period of debarment.

~~A person or Person(s) or entities~~ barred by the Council may appeal this decision to the Council in accordance with such debarment appeals procedures as the Council may establish. The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification or if the Council affirms its decision following appeal, and no additional appeal rights are available under these procedures.

~~After considering an individual or entity's challenge to the intent to bar or when no challenge is presented, the Council's decision to bar an individual is final. No appeal rights are available under these procedures.~~

C. DUE PROCESS AS IT RELATES TO COUNCIL ACTIONS

Explanation of Final Changes

During its April 2015 meeting, the Council approved final language that revised Criteria and procedures specific to determining areas needing improvement following an evaluation visit and student achievement outcomes reported through the Campus Accountability Report (CAR).

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and Institutional Accountability Report (IAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure pass rates, if applicable. When this review indicates that student achievement is below Council standards, the Council will require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP) and/or Institutional Effectiveness Plan (IEP). If the Council determines the institution ~~no longer~~ complies is out of compliance with the Council's requirement for student achievement, the Council will issue a Compliance Warning ~~a show cause directive, or otherwise take~~

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~~action~~ and require the institution to demonstrate compliance with the next year's CAR submission the time frames described in Title II, Chapter 3. These This time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., improvement in retention, placement, or licensure pass rates.

2-3-200 – Accreditation Deferred

When Council determines an institution is measured against the criteria and is found to be in marginal compliance, or there is insufficient evidence available for the Council to make a decision, ACICS may they may defer action until a later date pending receipt of additional information. In such cases, ACICS the Council will provide in writing the reasons for the deferral, state what the institution needs to provide, ~~sufficient time for the institution to respond~~ and ~~invite a response to the findings by a specify~~ the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, “no action at this time” and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on reevaluation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed, including time for procedural due process following the Council's review of the information not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.

D. COUNCIL GUIDELINES FOR THE ENFORCEMENT OF STUDENT ACHIEVEMENT STANDARDS

In applying standards 2-1-809 and 2-3-200, the Council will follow the general guidelines described below:

ACICS defines standards for student achievement that include Retention Rates, Placement Rates and Licensure Examination Pass Rates. These rates are calculated using data on retention, job placement and licensure pass rates submitted and reviewed annually through the Campus Accountability Report (CAR). The relevant terminology is defined and the formulas are described in the *Guidelines and Instructions for the Campus Accountability*

ACICS MEMORANDUM TO THE FIELD

May 13, 2015

Report. Quantitative Standards are applied at both the program level and the campus level, as described below.

Benchmark – Benchmarks are intended to encourage campuses and programs whose student achievement is below average to improve their performance and to ensure that they avoid falling below the Council Standard. A campus and/or program whose rates fall below the Benchmarks must develop and implement an Improvement Plan.

Council Standards – Council standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure exams where applicable, and find employment related to their fields. Once determined to be out of compliance with Council expectations for student achievement, a campus must come into compliance within established timeframes or its grant of accreditation may be withdrawn.

ACICS adopted enhanced student achievement standards in July 2012, effective for the 2013 reporting period and beyond, as described in the table below:

STUDENT ACHIEVEMENT STANDARDS				
Campus-Level Standards				
	Retention		Placement	
Benchmark	70%		70%	
Council Standard	60%		60%	
Program-Level Standards				
	Retention Program Length = ≤1 year	Retention Program Length = >1 year	Placement	Licensure ^{1, 2}
Benchmark	70%	65%	70%	70%
Council Standard	60%	60%	60%	60%

¹Where licensure is required for employment. ²Must also meet applicable agency standards.

ACICS MEMORANDUM TO THE FIELD

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DUE PROCESS FOR STUDENT ACHIEVEMENT STANDARDS		
	Campus and/or Program Status	Council Directed Actions*
Year 1	Deferral	<ul style="list-style-type: none"> Implementation of an Improvement Plan (IP) and Inclusion into the Campus Effectiveness Plan (CEP)
Year 2	Compliance Warning	<ul style="list-style-type: none"> Continue Improvement Plan and inclusion into the CEP following evaluation, analysis, evidence of monitoring and revision, if needed Prepare a draft Teach-out Plan for submission if continued below standard in Year 3
Year 3	Campus-Level: Withdrawal by Suspension	<ul style="list-style-type: none"> Appealable to Review Board of Appeals
	Program-Level: Termination of a Program	<ul style="list-style-type: none"> Submit a Program Termination Plan for ACICS approval

** It is understood that the Council has the right to take an adverse action or a show-cause directive at its discretion if an institution is deemed significantly out of compliance with little chance of coming into compliance within in a reasonable period of time.*

Deferral – The first year a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates below-standards, it is considered on *student achievement review*. The campus and/or program must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must include the required elements and may be reviewed during any on-site evaluation visit.

Compliance Warning – The second consecutive year a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates below standards, it will be placed on Compliance Warning status and found to be out of compliance. A campus and/or program on Compliance Warning status is required to evaluate, analyze and, if necessary, revise the Improvement Plan implemented while on student achievement review. The Council reserves the right to request submission of the evaluation and analysis of the Improvement Plan for Council review. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves into compliance with the applicable standard.

May 13, 2015

Withdrawal by Suspension or Termination of a Program – If a campus reports three consecutive years of below-standard retention or placement rates, the Council will issue a withdrawal by suspension action. The Council will require the campus to submit ~~it will be required to cease enrollment and implement~~ an ACICS-approved teach-out plan. If a program reports three consecutive years of below-standard retention, placement, or licensure pass rates, it will be required to cease enrollment and terminate the program of study.

Established Timeframes for Compliance – When a campus and or program is determined by the Council to be out of compliance, it will be required to bring itself into compliance within one year. Failure to bring the campus and/or program into compliance with retention, placement and/or program licensure pass rates within one year will result in ~~easing enrollment and implementation~~ of an approved teach-out plan. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance.

Data Collection and Verification – ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council calculates campus-and program-level a-retention and placement rates and program-level licensure pass rates where licensure is required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30 and placement is accepted through November 1st of the CAR reporting year.

In addition to the Council review of data on an annual basis, CAR data is reviewed during an on-site evaluation visit.

E. BYLAWS

Explanation of Final Changes

The Council approved final language to allow a former commissioner to be eligible to complete a vacated term prior to the expiration of the required three-year waiting period.

ARTICLE IV

Elections, Terms, Vacancies, Removal, Resignations, and Compensation

Section 5–Terms. Term of service as a commissioner shall be five years. A person elected or appointed to fill a term of less than two and one-half years is entitled to apply for nomination and election or appointment to a full term. Upon completion of a commissioner’s term, the commissioner shall not be eligible to serve another full term through election or appointment until three (3) years have elapsed. However, a commissioner appointment to complete a vacated term, in full or part, is not subject to the three-year (3) waiting period. ~~However,~~ a A commissioner who is elected to the Office of Chair-Elect in the final year of that commissioner’s term shall have that term extended for

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one year to allow service as the Chair of the Council to be fulfilled. If nominated, public representatives may serve one additional appointment without the three-year waiting period.

F. GENERAL EDUCATION -- GLOSSARY OF DEFINITIONS

Explanation of Final Changes

*In April 2014, the Council approved final language to strengthen the general education requirements by mandating that coursework must include the following general disciplines: humanities; mathematics and sciences; and the social sciences. In order to give institutions sufficient time to make curricular changes if necessary, the effective date of this requirement is **July 1, 2015**.*

GLOSSARY OF DEFINITIONS

General Education. Those areas of learning which are deemed to be the common experience of all "educated" persons, and must include subject matter from the humanities; mathematics and the sciences; and the social sciences.

II. FOR INFORMATION ONLY

A. CHANGES TO THE MEMORANDUM TO THE FIELD

ACICS has developed a systematic process for policy development which will allow more time for policy research and discussion. Beginning in January 2016, the Memorandum to the Field will be generally disseminated in January and September. Criteria changes voted as proposed by the Council will be detailed in the September Memorandum to the Field. Criteria changes voted as final by the Council will be detailed in the January Memorandum to the Field. Additionally, AWARE Webinars will be held in February and October.

B. TOPICS CURRENTLY UNDER COUNCIL CONSIDERATION

Based on input from member institutions, on-site evaluation teams and staff, the Council systematically reviews accreditation standards and policies.

In December 2014, the Council voted to implement a consistent sequence of policy review and development, research and analysis, publication of proposed policy changes for soliciting input from the field, and final actions. The plan is to publish the ACICS *Accreditation Criteria* in January of each year with the understanding that new policies or changes to *Criteria* are effective July 1st of each year, unless otherwise noted.

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For information purposes only, listed below is a partial list of topics currently under Council consideration:

1. Procedural changes to strengthen on-site evaluation of student recruitment practices.
2. Ideas for external review of recruitment procedures.
3. Basis for conducting unannounced visits.
4. Ideas to assure more accurate disclosure of institutional performance and student achievement information.
5. Ideas for a structured verification of institutional disclosures.
6. Changes to the Glossary definitions of “Home Institution” and Host Institution”.
7. Guidelines for the supervision and monitoring of third-party vendors, agents or contractors engaged in referral and recruitment activities.
8. Clarification of the utilization of “community resources”.
9. Clarification of “basic student records” and retention and protection of records.
10. Clarification of faulty teaching loads for non-degree and occupational associate’s degree programs.
11. Initiatives to broaden stakeholder participation in review of Council standards.
12. Clarification of Campus Effectiveness Plan (CEP) guidelines and requirements.
13. Other minor editorial changes to the Glossary definitions and *Criteria*.

Watch for further details on these items in the September 2015 Memorandum to the Field.

C. ACICS WEBSITE

Please visit the ACICS website www.acics.org. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: All institutions were mailed eight digit IDs and passwords to access the new ACICS Web site. The information was sent via U.S. postal mail and addressed to the campus director or president of each institution. The institution and corporate username (unless changed by the account holder) is the eight-digit ID. This ID should be used on all future correspondence to and from ACICS. If you have questions about your ID code or our new website, please send an email to ebiz@acics.org.

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D. 2015 WORKSHOP SCHEDULE

<i>CEP WORKSHOP</i>		
Campus Effectiveness Plan (CEP) Workshop	September 3, 2015	ACICS Office
<i>DEFERRAL WORKSHOP</i>		
Deferral Workshop	October 16, 2015	ACICS Office
<i>INITIAL ACCREDITATION WORKSHOP</i>		
Initial Accreditation Workshop	May 13, 2015	Seattle, WA
Initial Accreditation Workshop	October 6, 2015	La Jolla, CA
<i>RENEWAL ACCREDITATION WORKSHOP</i>		
Renewal Accreditation Workshop	July 28, 2015	Aventura, FL
Renewal Accreditation Workshop	September 2, 2015	ACICS Office
<i>RETENTION AND PLACEMENT WORKSHOP</i>		
Retention and Placement Workshop	June 11, 2015	ACICS Office

E. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Institutions play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you operate, please let us know about them. Send an email to Mr. Quentin Dean, Senior

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Regulatory Affairs Coordinator, at qdean@acics.org and let him know the source of the information and when it appeared.

F. ACICS AWARE WEBINARS

The AWARE webinar will be held on **Wednesday, May 20, 2015**. This webinar will focus on information presented in the May 2015 Memorandum to the Field. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Ms. Terron King at tking@acics.org.



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM Accrediting Council for Independent Colleges and Schools
DATE: September 16, 2015
The Memorandum to the Field contains proposed criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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1. Proposed Criteria Revisions

At its August 2015 meeting, the Council reviewed specific areas of the ACICS *Accreditation Criteria* outlined in Section I and approved the revisions as **proposed** (new language is underlined, ~~deleted language is struck~~). **Public comment on these revisions is requested on the Comment Form provided at the end of this memorandum.**

A. COUNCIL ACTION PROCESS

Explanation of Proposed Changes

The Council proposed modification to the language and terminology for compliance actions. The proposed modifications will more clearly indicate when an institution is determined to be out of compliance with Council standards and stipulate Council actions. A compliance warning will be issued when an institution is found out of compliance. A show-cause directive will be issued if Council determines that an institution is unlikely to become in compliance within the maximum timeframe. The institution will always be provided procedural guarantees that allows it to respond to the written areas of noncompliance. Revisions to the Accreditation Criteria necessary to ensure procedural consistency with the above-mentioned changes are also presented to the field for comment.

The Council has also provided an Appendix to this change that diagrams the proposed changes (Appendix A).

*The effective date for this proposed change is **January 1, 2016**.*

2-3-200 – Accreditation Deferred or Conditioned

2-3-210. Deferral. When Council determines there is insufficient evidence available to make a decision, they may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide within sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, “no action at this time” and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on reevaluation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed, ~~including time for procedural due process following the Council’s review of the information not to exceed twelve months, if the longest program is less than one year in~~

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~~length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.~~

2-3-220. Compliance Warning. When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council will issue a compliance warning. The institution will be provided in writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

A show-cause directive or a denial action/suspension order may be issued by ACICS as the result of this review as described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

When the reasons for the compliance warning are satisfied, the action may be lifted either by the President, in cases where no evaluation is involved, or by the Council in cases where evaluation of additional material is required.

2-3-403230. Show-Cause Directive. When the Council determines that an institution is not in compliance, and is unlikely to become in compliance, ~~accreditation of an institution is subject to suspension action (other than summary suspension under Section 2-2-301)~~ because the Council determines has reason to believe that the institution is not, or may not be, in compliance with the *Accreditation Criteria*, the institution will be provided in writing with the ~~alleged deficiencies~~ areas of noncompliance and will be invited to "show cause" why its accreditation should not be suspended or otherwise conditioned.

~~A show cause directive is not a negative or conditioning action. Rather, it is issued to an institution for it to come forward and prove that a negative or conditioning action should not be taken. However, €The opportunity to show cause before the Council will be considered to be a hearing as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to final adverse action.~~

~~In many circumstances, it is possible for an institution to respond to a show-cause directive in writing by which it demonstrates correction of the condition upon which the directive was based. When the reasons for the show-cause are satisfied, the directive may be lifted either by the President in cases where no evaluation is involved or by ACICS in cases where evaluation of additional material is required and following such evaluation. All institutions directed by the Council to show cause why their accreditation should not be suspended or otherwise conditioned will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.~~

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2-3-800240 – Probation

Probation is a status that the Council may impose on an institution if the institution is unable to demonstrate that it consistently operates in accordance with the *Accreditation Criteria*.

2-3-802241. Imposition. Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action.

2-3-802242. Result of Probation. The Council will not accept any applications for new programs or new campuses from any institution on probation unless the institution receives approval in advance to submit such an application.

2-3-802243. Probation Lifted. Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show-cause directive has been vacated. The Council may order a special visit at the institution's expense before lifting probation.

2-3-802244. Notification of Probation. The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on probation. The institution is required to notify immediately in writing its current and prospective students that it has been placed on probation by its accrediting agency.

2-3-300 – Accreditation Denied

...

2-3-400 – Accreditation Withdrawn

...

2-3-404403. Procedural Guarantees for Withdrawal by Suspension.

...

2-3-900800 – Special and Fact Visits

...

2-3-1000900 – Debarment

...

There are a number of other standards that need revision to reflect the proposed revisions to the Council Action Process. They are detailed below with proposed changes:

Self-study not submitted

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 by September 30th of the year prior to the last year of the grant of accreditation. This also involves submission

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of the institution's renewal self-study, with supporting documents. Institutions that have not submitted a renewal self-study by December 1st of the year preceding expiration of the grant, and have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, may be issued a compliance warning directed to show cause why its accreditation should not be withdrawn, suspended, or otherwise conditioned...

Explanation of Program Length, Tuition, & Fees

2-1-807. Program Length and Tuition and Fees. ACICS will determine average program lengths and tuition and fees annually based on information collected in the Annual Accountability Reports and will provide these data to all accredited institutions. Institutions with program lengths that are more than one standard deviation from the average will be required to submit an explanation for the deviation. If the Council does not accept the explanation, it may require a consultation between ACICS and the institution, direct an on-site evaluation, issue a ~~show-cause directive~~ compliance warning, or withhold inclusion of the program from the institution's current grant of accreditation.

Financial Review

2-1-808. Financial Review. The Council reviews the Annual Financial Report, audited financial statements, and other relevant information to monitor each institution's financial condition. When this review indicates that an institution's financial condition may be weak or deteriorating, the Council will require the institution to furnish Quarterly Financial Reports, a Financial Improvement Plan, or other interim narrative reports that demonstrate the actions the institution is taking to improve its financial condition. If the Council determines the institution no longer complies with the Council's requirements for financial stability, the Council will issue a compliance warning, issue a show-cause directive, or otherwise take negative action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in financial stability. Institutions that are required to submit interim financial reports or that are determined to be out of compliance with the Council's standards for financial stability are considered to be on financial review and are subject to additional restrictions regarding the initiation of branches and learning sites.

Student Achievement (CAR standards)

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and ~~Institutional Accountability Report (IAR)~~ to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure pass rates, if applicable. When this review indicates that student achievement is below Council standards, the Council will require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP) ~~and/or Institutional Effectiveness Plan (IEP)~~. If the Council determines the institution is out of compliance with the Council's requirement for student achievement, the Council will issue a ~~C~~compliance W~~w~~arning and require the institution to demonstrate compliance with the

next year's CAR submission. This time frame may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., improvement in retention, placement, or licensure pass rates.

Unapproved Programs or Changes to a Program

2-2-121. Changes to Existing Programs. Changes to existing or currently approved programs fall under (a) extensive changes and (b) non-substantive changes.

(a) *Extensive Changes.* An extensive change to existing program application process must be initiated and approval received prior to implementation. Failure to do so will result in a ~~show-cause action~~ compliance warning for offering an unapproved program. The following changes will be considered substantive changes to the institution's scope of accreditation and require approval per Section 2-2-100 Substantive Changes:

- i. A 25% increase in the number of clock or credit hours awarded for successful completion of an existing program.
- ii. a change from clock hours to credit hours

Complaints or Adverse Information

2-3-700 – Complaints and Adverse Information

...

The role of the Council in resolving complaints and investigating adverse information is to determine whether the institution is out of compliance with one or more accrediting standards to which the complaint is addressed or to which the adverse information applies. After such determination, ACICS may then do one of the following:

- (a) dismiss the complaint or terminate further investigation of the adverse information;
- (b) postpone a final action on the complaint or adverse information if there is evidence that the institution is making progress to rectify the situation or if more investigation is necessary; or
- (c) notify the institution that, on the basis of information available, ACICS has determined that the institution is failing to comply with the *Accreditation Criteria* and that the institution is:
 - (i) directed to show cause why its accreditation should not be suspended, revoked, or otherwise conditioned;
 - (ii) issued a compliance warning;
 - (iii) directed to submit a report to ACICS detailing plans for rectifying the area(s) of noncompliance; or
 - (iv) directed to undergo a special on-site evaluation.

The Council will inform the complainant of the determination by the Council and the disposition of the complaint.

Guidelines for Institutionally Funded Student Aid

Appendix E – Guidelines for Institutionally Funded Student Aid

In evaluating institutionally funded student aid, ACICS will consider the characteristics listed below. These characteristics are not listed in any priority order. Any institution whose aid program is not in accordance with any or all of these characteristics may be

subject to a compliance warning directive by ACICS to show cause why its grant of accreditation should not be suspended, revoked, or otherwise conditioned. The greater the number of these characteristics evident in an institution's grant program, the greater the presumption of acceptability. ACICS will, however, review each institutional grant program in its entirety.

...

B. UNANNOUNCED VISITS

Explanation of Proposed Changes

The Council proposes to modify language to this criterion to allow the Council, at its discretion, to direct an institution to host an unannounced visit at any time. The Council determined that there is a need for flexibility in the evaluation process, which would allow for the review of an institution without prior notice.

2-1-805. Unannounced Visits. The Council, at its discretion, may direct an unannounced visit to occur at an institution, at any time, about which it has received adverse information or when general operations of the institution may be called into question. Procedures for unannounced visits are described in Appendix B.

C. COMMUNITY RESOURCES

Explanation of Proposed Changes

The Council proposes to clarify the intent of this criterion by specifying the expectations of using a variety of activities in every program which should focus on student enrichment and career opportunities.

3-1-512 (c): Resources of the community shall be utilized to enrich the program. The use of community resources shall be varied in each program and shall be utilized to enhance student enrichment and potential career opportunities. (See Glossary definition for Community Resources).

GLOSSARY OF DEFINITIONS

Community Resources. ~~Individuals, organizations, or businesses that provide information, guidance or support to an institution, such as professional and trade associations, employers, guest speakers, and advisory committees. A variety of individuals, organizations, or businesses that provide information, guidance or support to a specific program of study or career opportunity, such as professional and trade associations, employers, and guest speakers. An advisory committee may be utilized as a community resource provided it is supplemented by other community resources.~~

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D. TEACHING LOADS

Explanation of Proposed Changes

The Council proposes to revise the language that currently limits the teaching load of faculty at the credential level to language that is consistent with other degree programs. The expectation of reasonableness remains and should take into account and be justified by various academic factors.

~~3-2-101. Teaching Load. An instructor's teaching load, including night school, shall not exceed 32 clock hours per week, except that an overload of not more than one subject per term for additional compensation is permitted. Teaching loads may differ when using alternative methods of instruction and must be commensurate with the type of delivery method utilized. For purposes of this calculation, assigned courses offered by nontraditional or distance learning modes of instruction are deemed to consist of one clock hour per week for each unit of academic credit awarded.~~

Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

~~3-3-303. Teaching Load. An instructor's teaching load, including night school, shall not exceed 32 clock hours per week, except that an overload of not more than one subject per term for additional compensation is permitted. Teaching loads may differ when using alternative methods of instruction and must be commensurate with the type of delivery method utilized. For purposes of this calculation, assigned courses offered by nontraditional or distance learning modes of instruction are deemed to consist of one clock hour per week for each unit of academic credit awarded.~~

Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

E. FACULTY ASSIGNMENTS - - APPLIED GENERAL EDUCATION

Explanation of Proposed Changes

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The Council proposes to add language to clarify its intent for general education teaching faculty at the non-degree level. This revision is consistent with the academic preparation requirements of applied general education faculty at the occupational associate's degree level. This revision also includes the acceptance of completed doctoral coursework as qualifying credit hours to teach.

3-2-104. Assignments. The requirements for full- and part-time faculty members teaching in the referenced subject areas are as follows:

(a) A bachelor's degree and appropriate coursework in the assigned subject are required for faculty members teaching applied general education and other academic courses.

3-3-302. Assignments.

(a) A bachelor's degree and appropriate coursework in the assigned subject are required for faculty members teaching applied general education. Instructors at a minimum shall have earned 15 semester or equivalent hours of coursework through a combination of hours from an associate's, bachelor's, ~~and/or~~ master's, and/or doctoral level coursework in the area of their teaching assignment.

F. GLOSSARY OF DEFINITIONS

Explanation of Proposed Changes

The Council proposes to modify language by removing dated terminology and clarifying the definitions listed in the Glossary.

Lecture. A learning environment setting, ~~usually a classroom~~, where a teacher instructs students in the theory, principles, or history of an academic or vocational subject. To maximally benefit from such instruction, a student is assumed to have done outside preparation. Two hours of preparation for each hour of ~~lecture~~ instruction are generally assumed.

Laboratory. A learning environment setting, ~~usually with equipment~~, where students apply knowledge or instruction ~~acquired in another setting, usually a class lecture or outside reading~~, to enhance skills and solve problems. Normally, two hours of work in a laboratory environment, under the supervision of an instructor, ~~setting with an instructor present~~ has the credit equivalency of one hour of classroom lecture.

In-Service Training. Special planned and systematic experiences sponsored by an institution and related to curriculum and instruction that affect the majority of the faculty in a collective fashion. In-service education has as its major goal the updating of teachers in (1) subject matter, (2) curriculum concepts, (3) new theories and techniques of

instruction, and (4) new educational media. ~~The most common activity is a lecture by an outside speaker on a subject related to curriculum, the institution, or a societal issue.~~

G. FACULTY PREPARATION

Explanation of Proposed Changes

The Council proposes to revise the listing of acceptable agencies for the evaluation of foreign credentials to also include the American Association of Collegiate Registrars and Admissions Officers (AACRAO).

3-1-541. Faculty Preparation.

...Credentials of faculty who are graduates from institutions outside the United States must be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO) or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the credentials awarded by institutions in the United States.

... by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO) or the National Association of Credential Evaluations Services (NACES) to determine the equivalency of the credentials awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English.

H. ADMISSIONS AND RECRUITMENT

Explanation of Proposed Changes

The Council proposes to modify language to the criterion in order to clarify its meaning related to the monitoring of admissions and recruitment. The proposed modifications clarify that the Council requires these activities be supervised by the institution. In addition, the institution may never delegate these activities to anyone whose economic incentives are to recruit prospects through means that are unethical or subject to public criticism or to admit ill-prepared applicants.

3-1-410 – Admissions and Recruitment

It is up to an institution to establish its own admissions criteria. It is the responsibility of ACICS to ensure that all who are enrolled are accorded equal educational opportunity.

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The ~~ultimate responsibility for the monitoring of the~~ activities of an institution's employees, vendors, contractors, or agents in the referral, recruiting, evaluation, and admissions processes ~~is the responsibility of always remains with~~ the institution. The activities of these individuals must be supervised by the institution. An institution may not delegate ~~without supervision~~ these activities to anyone whose economic incentives are to recruit prospects through means that are unethical or subject to public criticism or to admit ill-prepared applicants. The institution may not contract, directly or indirectly, with third parties who are generally unfamiliar with the institution. "Non-employees" are independent contractors who are not considered "employees" under the Internal Revenue Code.

Institutions participating in Title IV programs must be aware of regulations imposed by the U.S. Department of Education as they apply to recruiting practices.

I. CAMPUS EFFECTIVENESS PLAN

Explanation of Proposed Changes

The Council proposes to revise the current language in a number of areas including the deletion of "institutional effectiveness" since each and every campus should have its own plan; deletion of the language referring to "centrally controlled institution" since this structure has not been implemented by ACICS; and revision of the list of elements to be evaluated to replace "graduation rate" with level of student satisfaction. To provide additional clarity in its intent, the Council is also proposing to extensively revise the glossary definitions that relate directly to the Campus Effectiveness Plan and add a definition for "student satisfaction."

3-1-110 –Campus ~~Institutional~~ Effectiveness

An important indication of the overall effectiveness of an ACICS-accredited institution is the degree to which it meets its own predetermined educational outcomes. Each campus of an ACICS-accredited institution, consistent with its mission, shall develop and implement a Campus Effectiveness Plan that identifies how it plans to assess and continuously improve its educational programs and processes, and that addresses its ability to meet the educational and occupational objectives of its programs. In this document, each campus should attempt to incorporate short- term objectives to be accomplished in order to achieve the mission of the institution as it applies to the campus and its future goals.

3-1-111. ~~Campus and Institutional~~ Effectiveness Plans. Each campus shall have on file a Campus Effectiveness Plan (CEP). A main and its branches may share aspects of an CEP, such as the mission, but each main and branch campus is expected to have its own plan for effectiveness that describes the characteristics of the programs offered and of the student population, describes what types of data will be used for assessment, identifies outcomes, and states how continuous improvement will be made to improve or enhance outcomes at the campus. ~~A centrally controlled institution must also submit a consolidated Institutional~~

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~~Effectiveness Plan (IEP) containing information and data on the institution as a whole. The IEP of a centrally controlled institution is due on or before September 15 annually.~~

For the Campus Effectiveness Plan, the following six elements, at a minimum, will be evaluated for campus institutional effectiveness:

1. student retention rates;
2. ~~student~~ placement rates;
3. level of student satisfaction;
4. level of graduate satisfaction;
5. level of employer satisfaction; and
6. ~~student learning outcomes; and~~
6. ~~graduation rates [when available].~~

In compiling the data needed to assess the six elements, each campus shall identify and describe how the data were collected, the rationale for using each type of data, a summary and analysis of the data collected, and an explanation of how the data have been used to improve educational processes. Baseline data must be identified for each of the six elements.

For example, the data needed to demonstrate student learning outcomes includes baseline data and data to support that student learning has occurred. Examples of data may include, but are not limited to, course grades, GPA, CGPA, pre- and post-tests, entrance assessments, portfolios, standardized tests, professional licensure examinations, and other measures of skill and competency attainment. Placement data should not be used exclusively to validate student learning outcomes.

Each campus shall publish annual placement and retention goals. In formulating these goals, the campus shall take into account the retention and placement rates from the previous three Campus Accountability Reports and the specific activities that will be undertaken to meet those goals. The activities must demonstrate the campus' ability to maintain or improve retention and placement outcomes each year.

~~Institutions~~ Campuses are encouraged to include additional information in their plans which is relevant to improving their overall effectiveness.

~~For the Institutional Effectiveness Plan of a distributed enterprise institution, the following elements will be evaluated for institutional effectiveness, at a minimum:~~

PLANS

1. ~~Mission and Objectives of the distributed enterprise institution~~
2. ~~Strategic Planning Objectives~~
3. ~~Long Range Planning Goals and Timelines for:~~
 - a. ~~Expansion and addition of campuses~~
 - b. ~~Student enrollment~~
 - c. ~~Retention and placement rates~~

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~~4. Plans for Continuous Improvement~~

DATA

- ~~1. Three (3) years of retention and placement trend data for the institution~~
- ~~2. Three (3) years of retention and placement trend data for each program~~
- ~~3. Student demographic data for the institution~~
- ~~4. Comparison and analysis of baseline data between campuses~~
- ~~5. Analysis of cohort default rates for the institution~~
- ~~6. Assessment of learning outcomes across the institution~~
- ~~7. Graduation Rates~~

PROCESS

- ~~1. Composition of the institution's IEP team~~
- ~~2. Institutional process for curriculum review~~
- ~~3. Compliance monitoring and internal controls~~

3-1-112. Implementation and Monitoring of the Campus and Institutional Effectiveness Plans. ~~Distributed enterprise institutions and a~~All campuses shall document that the specific activities listed in the plan are carried out and that periodic progress reports are completed to ensure that the plan's activities are implemented. Appropriate individuals should be assigned responsibility for implementing and monitoring the Campus and Institutional Effectiveness Plans.

3-1-113. Evaluation of the Campus and Institutional Effectiveness Plans. ~~Distributed enterprise institutions and a~~All campuses shall evaluate the plan, its goals, and activities at least annually. Evaluation requires the determination of initial baseline rates and a measurement of results after planned activities have occurred. ~~Distributed enterprise institutions and all campuses shall maintain documentation of historical outcomes and show evidence of how this documentation is used to achieve expected goals.~~ ~~Distributed enterprise institutions and a~~ All campuses should adjust their goals accordingly as a result of an evaluation of the ~~Institutional and~~ Campus Effectiveness Plans.

CORRESPONDING GLOSSARY OF DEFINITIONS

Employer Satisfaction. ~~The level of employer satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria).~~ Employer satisfaction and the level of satisfaction are defined by the campus institution based upon information collected, typically via a survey, on a regular basis from employers who have, ~~or might,~~ hired graduates ~~from the~~ of programs offered by the campus institution. ~~Recommended information includes a survey of local employers as well as non-local employers who have hired graduates.~~ Satisfaction questions should cover different aspects of career preparation in general (such as professionalism, foundational and soft skills), as well as specific skills in the particular field and the overall satisfaction

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of the employer with the preparation of graduates to perform tasks which utilize such skills provided by the institution.

Graduate Satisfaction Level. ~~The level of graduate satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria).~~ Graduate satisfaction and the level of satisfaction are defined by the campus ~~institution~~ based upon information collected on a regular basis from students who have graduated from the programs offered by the campus ~~institution~~. Recommended information includes the results of surveys of all graduates who left the institution at least ~~30 days~~ six months prior to being contacted. Satisfaction questions should cover different aspects of the program and the ~~campus institution~~ as well as overall satisfaction of the graduate with the preparation ~~provided by the campus~~ for the position ~~provided by the institution.~~

Graduation Rates (when available). ~~ACICS is developing a measure of graduation rates that is comprehensive and applicable at the program, campus, and institution level. Once the measure has been implemented through the Campus Accountability Report and validated, the graduation rate will be a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The comprehensive graduation rate is defined by ACICS in terms of the number of students who have completed or graduated during a reporting year, divided by the number of completers and graduates plus the number of students who have withdrawn, and expressed as a percent. The graduation rate, also called the graduates-to-leavers ratio, is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the Guidelines and Instructions for the Campus Accountability Report, which is available on the ACICS website. The detailed formula includes definitions, adjustments, and exclusions for calculating completers, graduates and withdrawals.~~

Outcomes, Campus. ~~The effectiveness of an institution is determined by its outcomes. The intended result or end result of an activity or process in the assessment of effectiveness. In determining effectiveness, campuses institutions are required to evaluate the following outcomes: placement rates (in field, related field); retention rates; graduate licensure pass rates relative to minimum quantitative standards for state licensing examinations; employer satisfaction as determined by periodic surveys of those who employ graduates; graduate satisfaction as determined by periodic surveys of graduates; and student satisfaction as determined by periodic surveys of current students, and other student learning outcomes. Campuses Institutions also may use additional outcomes in evaluating effectiveness.~~

Placement Rate. ~~The placement rate is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The Placement Rate is defined by ACICS in terms of the total number of completers and graduates minus those who are not placed (employed) in their field of study or a related field of study, divided by the total number of completers and graduates and expressed as a percent. The placement rate is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the Guidelines and Instructions for the Campus Accountability Report,~~

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which is available on the ACICS website. The detailed formula includes definitions of placed in field and related field placement, adjustments, and exclusions for students not available for placement. ~~Three years of placement rate data are required in the CEP, and the institution is required to define and publish goals for placement rates. ACICS also publishes standards for campus level and program level placement rates which accredited institutions are expected to meet or exceed. Institutions falling below Council standards are subject to planning requirements, monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.~~

Retention Rate. The retention rate is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The Retention Rate is defined by ACICS in terms of the total student enrollment, minus those students who withdraw, divided by the total student enrollment and expressed as a percent. The retention rate is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the *Guidelines and Instructions for the Campus Accountability Report*, which is available on the ACICS website. The detailed formula includes definitions adjustments, and exclusions for calculating total enrollment and withdrawals. ~~Three years of retention rate data are required in the CEP, and the institution is required to define and publish goals for retention rates. ACICS also publishes standards for campus level and program level retention rates which accredited institutions are expected to meet or exceed. Institutions falling below Council standards are subject to planning requirements, monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.~~

Student Learning Outcomes. Concise measurable statements of direct and indirect learning outcomes with assessments that specify what students will know, be able to do, or demonstrate as a result of a specific, planned education experience. Student learning Outcomes are expressed as measurable knowledge, skills, abilities or attitudes.

Direct and Indirect Assessment of Learning Outcomes. See Direct Assessment Competency-based Programs for examples.

Student Satisfaction: Student satisfaction and the level of satisfaction are defined by the campus based upon information collected, typically via a survey, on a regular basis from students who are currently enrolled at the campus. Satisfaction questions should cover different aspects of the current program of study and the services provided by the campus to prepare the student for the workforce.

J. BRANCH AND LEARNING SITE PROCEDURES

Explanation of Proposed Changes

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The Council proposes to modify current language related to the approval of branch campuses and learning sites to be compatible with current ACICS procedures.

2-2-110. Evaluation, Approval and Monitoring of Substantive Change Activity.

All activity for which approval is sought will be evaluated by ACICS before approval is granted. Following is a description of those evaluations.

(a) *Branch Campus.* Initial inclusion of a branch campus within the scope of the accreditation of the institution may be granted by the President upon receipt of all required information. An institution proposing the initiation of a new location must follow the procedures as outlined by the Council and disclosed on its website. A new location must receive initial inclusion before advertising, recruiting, or enrolling students at the proposed location. The Council reserves the right to require a preliminary visit to any potential branch campus prior to the granting of initial inclusion.

A branch campus that is granted initial inclusion by the President will be required to undergo a verification visit within six months after the initial class start date. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

~~A decision regarding the final inclusion of a branch campus will be made by the Council in full session following a visit by an evaluation team. Prior to the final inclusion visit, the chief on-site administrator of the location will be required to attend an Accreditation Workshop and to submit additional documentation as outlined and disclosed on the ACICS Web site. The evaluation will normally be scheduled for twelve to eighteen months after the initial class start date and will be conducted by a team of evaluators determined by the size of the institution, the type and number of programs being offered, and other special circumstances. Identification of significant deficiencies during the verification or final inclusion visits can result in an immediate show cause directive to the institution.~~

Only after a determination of acceptability, ~~either at the initial or final inclusion level~~, and notification to the institution of the decision, may the institution consider ~~an a~~ a branch campus to be included within the scope of the institution's grant of accreditation. If approval is withheld, the withholding may be treated as a deferral or a denial, based on circumstances, and the institution may exercise its due process rights as outlined in Title II, Chapter 3.

(b) *Learning Site.* The President is authorized to evaluate and approve additions to a main or branch campuses that are apart from the primary location of that campus. Educational activities at a learning site are eligible to be evaluated for inclusion within the scope of the accreditation of the managing campus provided that the learning site has been established to meet a specific educational need or condition and is authorized by the appropriate governmental education authority, if applicable.

The managing campus proposing the initiation of a learning site must submit a Learning Site Application. The managing campus must assure the Council that the educational activities at the learning site complement the overall objectives of the institution. Based on its review of the application materials, ACICS may (1) grant ~~final~~ inclusion of the learning site or (2) deny the application.

A learning site that is granted ~~final~~ inclusion by the ~~President~~ will be required to undergo a verification visit within six months after the initial class start date if 50% or more of a program will be offered at the site. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

All additions to the campuses of an institution are evaluated during an institution's regular evaluation for a renewal of accreditation.

K. FACULTY ASSIGNMENTS AT THE DOCTORAL LEVEL

Explanation of Proposed Changes

The Council proposes to clarify current language related to the faculty assignments at the doctoral level.

~~**3-7-502. Assignments.** Faculty shall be assigned in terms of their major and minor areas of academic preparation and related experience. The size of the faculty shall be appropriate for the enrollment. All doctorate program faculty should have appropriate graduate and terminal degrees. All courses are to be taught by faculty possessing terminal degrees. Professional certification is not a substitute for a terminal degree. The institution also should encourage faculty members to engage in practical or scholarly research and to publish in professional journals.~~

~~The principal faculty members must possess doctoral/terminal professional degrees from accredited institutions. These individuals also must demonstrate expertise in the field of study taught and possess applicable experience in participating in a doctorate degree program.~~

All doctoral degree courses are to be taught by faculty possessing doctoral or terminal professional degrees from accredited institutions. These individuals also must demonstrate expertise in the field of study taught, possess applicable professional experience for participating in a doctoral degree program and maintain current professional certification in their discipline

Faculty shall be assigned in terms of their major and minor areas of academic preparation, related professional experience, and appropriate required professional certification to practice in the field. Professional certification alone, without a doctoral or terminal degree, is inadequate. The size of the faculty shall be appropriate for the enrollment in the program. The institution must require faculty members to engage in practical or scholarly research and to publish in professional journals.

2. For Information Only

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A. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: The institutional ACICS ID should be used on all correspondence to and from ACICS. If you have questions about your ID code, please send an email to ebiz@acics.org.

B. 2015 WORKSHOP SCHEDULE

DEFERRAL WORKSHOP		
Deferral Workshop	October 16, 2015	ACICS Office
INITIAL ACCREDITATION WORKSHOP		
Initial Accreditation Workshop	October 6, 2015	La Jolla, CA

C. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Friday, November 6, 2015**.

D. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Schools play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you

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operate, please let us know about them. Send an email to Mr. Quentin Dean at gdean@acics.org and let him know the source of the information and when it appeared.

E. ACICS AWARE WEBINAR

An AWARE webinar will be held on **Tuesday, September 29, 2015**. This webinar will focus on information presented in the September 2015 Memorandum to the Field. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Mr. Ian Harazduk at iharazduk@acics.org.

F. CHANGES TO THE MEMORANDUM TO THE FIELD

ACICS has developed a systematic process for policy development which will allow more time for policy research and discussion. Beginning in January 2016, the Memorandum to the Field will be generally disseminated in January and September. Criteria changes voted as proposed by the Council will be detailed in the September Memorandum to the Field. Criteria changes voted as final by the Council will be detailed in the January Memorandum to the Field. Unless otherwise specified, final criteria voted by the Council in December and published in the January memorandum to the field will go into effect **July 1**. Additionally, AWARE webinars will be held in September and January.

G. REVIEW OF INSTITUTIONAL DISCLOSURES OF STUDENT ACHIEVEMENT

In an effort to strengthen its procedures and to ensure that member institutions meet the expectations of the Council regarding honesty and integrity, the Council has instructed staff to begin to routinely review member institutions public disclosures of student achievement data outside of the normal visit cycle. Systematically and on a recurring basis, ACICS will review the accuracy, clarity and accountability of institutional disclosures on student achievement by performing random reviews of member institutions' website homepages and disclosure pages, publications, and advertisements. The data will be collected, analyzed, and presented for review to the Council. The student achievement disclosure outreach program supports ACICS' compliance with re-recognition requirements of the U.S. Department of Education and CHEA regarding the effective and continuous quality review of institutions during and in between the normal accreditation review cycle.

H. SYSTEMATIC REVIEW ADVISORY COMMITTEE

In its continued efforts to solicit feedback and participation in the development, revision, and augmentation of its policies and procedures, the Council has created a Systematic Review Advisory Committee (SRAC) that will represent key external stakeholders. The stakeholders will include students, faculty, graduates, and employers. The Committee will be composed of at least 16 members, equally represented by each group, and will be responsible for providing continuous and systematic feedback to the Council on at least an annual basis.

To ensure the success of this initiative, ACICS solicits the recommendations from its membership for representatives of the various stakeholder groups. We are looking for:

- Exceptional students who serve on student councils, as ambassadors, or are campus leaders who would be willing to provide student-centric perspective on ACICS standards;
- Faculty members who can provide feedback and expertise on academic quality, curriculum advancements, and general educational activities;
- Graduates who continue to contribute to enhancing educational quality via participation on institutional committees and boards; and
- Employers who serve on advisory boards or who otherwise support the mission of the institutions and are willing to provide objective feedback on the strengths and challenges that affect policy development.

If you know any individuals that may be a candidate for this committee or are yourself a potential candidate, please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org.

ACICS MEMORANDUM TO THE FIELD

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3. Comment Form – Proposed Criteria Revisions

ACICS ID Code: _____ Date: _____

Name of Organization: _____

Address: _____

Please check (as appropriate):

Proposed *Accreditation Criteria* revisions:

- Council Action Process

Accept as Written Modify (please explain)

- Unannounced Visits

Accept as Written Modify (please explain)

- Community Resources

Accept as Written Modify (please explain)

- Teaching Loads

Accept as Written Modify (please explain)

- Faculty Assignments - - Applied General Education

Accept as Written Modify (please explain)

- Glossary of Definitions

ACICS MEMORANDUM TO THE FIELD

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Accept as Written Modify (please explain)

• Faculty Preparation

Accept as Written Modify (please explain)

• Admissions and Recruitment

Accept as Written Modify (please explain)

• Campus Effectiveness Plan

Accept as Written Modify (please explain)

• Branch and Learning Site

Accept as Written Modify (please explain)

• Faculty Assignments at the Doctoral

Accept as Written Modify (please explain)

Prepared by: _____

Title: _____

Signature: _____

Please respond by Friday, November 6, 2015 to:

ACICS MEMORANDUM TO THE FIELD

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Mr. Ian Harazduk
Senior Manager of Compliance
Accrediting Council for Independent Colleges and Schools
750 First Street, NE, Suite 980
Washington, DC 20002-4241
Fax (202) 842-2593
fieldcomments@acics.org



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM Accrediting Council for Independent Colleges and Schools
DATE: September January 13, 2016
The Memorandum to the Field contains final criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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1. Final Criteria Revisions

At its December 2015 meeting, the Council reviewed specific areas of the ACICS *Accreditation Criteria*. The language contained in this section was previously reviewed by ACICS constituents and/or reflects a clarification of previously approved criteria.

The Council has updated the respective sections of the *Accreditation Criteria* to reflect all final criteria revisions effective January 1, 2016. For the revisions of the *Accreditation Criteria* that are effective July 1, 2016, there will be an updated copy of the *Criteria*. To obtain a current copy of the *Accreditation Criteria*, please visit our website as www.acics.org. The *Accreditation Criteria* can be found in the **Publications** section of the website.

The following criteria were previously reviewed and have been accepted as **final** and the effective date is noted within each section (new language is underlined, ~~deleted language is struck~~).

A. COUNCIL ACTION PROCESS (Effective January 1, 2016)

Explanation of Final Changes

*The Council has changed the language and terminology for compliance actions. The modifications streamline Council actions as to when an institution is determined to be out of compliance with Council standards. A **Compliance Warning** will be issued if the Council determines that an institution is found out of compliance. A show-cause directive will be issued if Council determines that an institution is unlikely to become in compliance within the maximum timeframe. The institution will be provided procedural guarantees that allow them to respond to the written areas of noncompliance.*

Revisions to the Accreditation Criteria necessary to ensure procedural consistency have also been made throughout the applicable criteria.

The Council has also provided an Appendix to this change that visually represents the final changes (Appendix A).

*The effective date for this change is **January 1, 2016**.*

2-3-200 – Accreditation Deferred or Conditioned

2-3-210. Deferral. When Council determines there is insufficient evidence available to make a decision, they may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide with sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified

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deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, "no action at this time" and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on reevaluation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed, ~~including time for procedural due process following the Council's review of the information not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.~~

2-3-220. Compliance Warning. When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council will issue a compliance warning. The institution will be provided in writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

A show-cause directive or a denial action/suspension order may be issued by ACICS as the result of this review as described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

When the reasons for the compliance warning are satisfied, the action may be lifted either by the President, in cases where no evaluation is involved, or by the Council in cases where evaluation of additional material is required.

2-3-403230. Show-Cause Directive. When the Council determines that an institution is not in compliance, and is unlikely to become in compliance, ~~accreditation of an institution is subject to suspension action (other than summary suspension under Section 2-2-301) because the Council determines has reason to believe that the institution is not, or may not be, in compliance~~ with the *Accreditation Criteria*, the institution will be provided in writing with the ~~alleged deficiencies~~ areas of noncompliance and will be invited to "show cause" why its accreditation should not be suspended or otherwise conditioned.

~~A show-cause directive is not a negative or conditioning action. Rather, it is issued to an institution for it to come forward and prove that a negative or conditioning action should not be taken. However, t~~The opportunity to show cause before the Council will be considered to be a hearing as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to final adverse action.

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In many circumstances, it is possible for an institution to respond to a show-cause directive in writing by which it demonstrates correction of the condition upon which the directive was based. When the reasons for the show-cause are satisfied, the directive may be lifted either by the President in cases where no evaluation is involved or by ACICS in cases where evaluation of additional material is required and following such evaluation. All institutions directed by the Council to show cause why their accreditation should not be suspended or otherwise conditioned will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

2-3-800240 – Probation

Probation is a status that the Council may impose on an institution if the institution is unable to demonstrate that it consistently operates in accordance with the *Accreditation Criteria*.

2-3-802241. Imposition. Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action.

2-3-802242. Result of Probation. The Council will not accept any applications for new programs or new campuses from any institution on probation unless the institution receives approval in advance to submit such an application.

2-3-802243. Probation Lifted. Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show-cause directive has been vacated. The Council may order a special visit at the institution's expense before lifting probation.

2-3-802244. Notification of Probation. The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on probation. The institution is required to notify immediately in writing its current and prospective students that it has been placed on probation by its accrediting agency.

2-3-300 – Accreditation Denied

...

2-3-400 – Accreditation Withdrawn

...

2-3-404403. Procedural Guarantees for Withdrawal by Suspension.

...

2-3-900800 – Special and Fact Visits

...

2-3-1000900 – Debarment

...

There are a number of other standards that were revised to reflect the final language to the Council Action Process. They are detailed below:

Self-study not submitted

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 by September 30th of the year prior to the last year of the grant of accreditation. This also involves submission of the institution's renewal self-study, with supporting documents. Institutions that have not submitted a renewal self-study by December 1st of the year preceding expiration of the grant, and have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, may be issued a compliance warning directed to show cause why its accreditation should not be withdrawn, suspended, or otherwise conditioned...

Explanation of Program Length, Tuition, & Fees

2-1-807. Program Length and Tuition and Fees. ACICS will determine average program lengths and tuition and fees annually based on information collected in the Annual Accountability Reports and will provide these data to all accredited institutions. Institutions with program lengths that are more than one standard deviation from the average will be required to submit an explanation for the deviation. If the Council does not accept the explanation, it may require a consultation between ACICS and the institution, direct an on-site evaluation, issue a ~~show-cause directive~~ compliance warning, or withhold inclusion of the program from the institution's current grant of accreditation.

Financial Review

2-1-808. Financial Review. The Council reviews the Annual Financial Report, audited financial statements, and other relevant information to monitor each institution's financial condition. When this review indicates that an institution's financial condition may be weak or deteriorating, the Council will require the institution to furnish Quarterly Financial Reports, a Financial Improvement Plan, or other interim narrative reports that demonstrate the actions the institution is taking to improve its financial condition. If the Council determines the institution no longer complies with the Council's requirements for financial stability, the Council will issue a compliance warning, issue a show-cause directive, or otherwise take negative action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in financial stability. Institutions that are required to submit interim financial reports or that are determined to be out of compliance with the Council's standards for financial stability are considered to be on financial review and are subject to additional restrictions regarding the initiation of branches and learning sites.

Student Achievement (CAR standards)

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and ~~Institutional Accountability Report (IAR)~~ to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure pass rates, if applicable. When this review indicates that student achievement is below Council standards, the Council will require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP) ~~and/or Institutional Effectiveness Plan (IEP)~~. If the Council determines the institution is out of compliance with the Council's requirement for student achievement, the Council will issue a ~~C~~ompliance ~~W~~arning and require the institution to demonstrate compliance with the next year's CAR submission. This time frame may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., improvement in retention, placement, or licensure pass rates.

Unapproved Programs or Changes to a Program

2-2-121. Changes to Existing Programs. Changes to existing or currently approved programs fall under (a) extensive changes and (b) non-substantive changes.

(a) *Extensive Changes.* An extensive change to existing program application process must be initiated and approval received prior to implementation. Failure to do so will result in a ~~show cause action~~ compliance warning for offering an unapproved program. The following changes will be considered substantive changes to the institution's scope of accreditation and require approval per Section 2-2-100 Substantive Changes:

- i. a 25% increase in the number of clock or credit hours awarded for successful completion of an existing program.
- ii. a change from clock hours to credit hours.

(b) ...

Complaints or Adverse Information

2-3-700 – Complaints and Adverse Information

...

The role of the Council in resolving complaints and investigating adverse information is to determine whether the institution is out of compliance with one or more accrediting standards to which the complaint is addressed or to which the adverse information applies. After such determination, ACICS may then do one of the following:

- (a) dismiss the complaint or terminate further investigation of the adverse information;
- (b) postpone a final action on the complaint or adverse information if there is evidence that the institution is making progress to rectify the situation or if more investigation is necessary; or
- (c) notify the institution that, on the basis of information available, ACICS has determined that the institution is failing to comply with the *Accreditation Criteria* and that the institution is:

- (i) issued a compliance warning;
- (ii) directed to show cause why its accreditation should not be suspended, revoked, or otherwise conditioned;

(iii) directed to submit a report to ACICS detailing plans for rectifying the area(s) of noncompliance; or

(iv) directed to undergo a special on-site evaluation.

The Council will inform the complainant of the determination by the Council and the disposition of the complaint.

Guidelines for Institutionally Funded Student Aid

Appendix E – Guidelines for Institutionally Funded Student Aid

In evaluating institutionally funded student aid, ACICS will consider the characteristics listed below. These characteristics are not listed in any priority order. Any institution whose aid program is not in accordance with any or all of these characteristics may be subject to a ~~compliance warning directive by ACICS to show cause why its grant of accreditation should not be suspended, revoked, or otherwise conditioned.~~ The greater the number of these characteristics evident in an institution's grant program, the greater the presumption of acceptability. ACICS will, however, review each institutional grant program in its entirety.

...

B. UNANNOUNCED VISITS

Explanation of Final Changes

The Council may, at its discretion, decide to direct an institution to host an unannounced visit at any time. The Council determined that there is a need for a policy which would allow for the review of an institution without prior notice.

The effective date for this change is July 1, 2016.

2-1-805. Unannounced Visits. The Council, at its discretion, may direct an unannounced visit to occur at an institution, at any time, ~~about which it has received adverse information or when general operations of the institution may be called into question.~~ Procedures for unannounced visits are described in Appendix B.

C. COMMUNITY RESOURCES

Explanation of Final Changes

The Council has clarified the intent of this criterion by specifying the expectations of using a variety of activities in every program which should focus on student enrichment and career opportunities.

The effective date for this change is July 1, 2016.

~~3-1-512 (c): Resources of the community shall be utilized to enrich the program. The use of community resources shall be varied in each program and shall be utilized to enhance student enrichment and potential career opportunities. (See Glossary definition for Community Resources).~~

GLOSSARY OF DEFINITIONS

~~**Community Resources.** Individuals, organizations, or businesses that provide information, guidance or support to an institution, such as professional and trade associations, employers, guest speakers, and advisory committees. A variety of individuals, organizations, or businesses that provide information, guidance or support to a specific program of study or career opportunity, such as professional and trade associations, employers, and guest speakers. An advisory committee may be utilized as a community resource provided it is supplemented by other community resources.~~

D. TEACHING LOADS

Explanation of Final Changes

The Council revised the language that currently limits the teaching load of faculty at the non-degree and occupational associate's degree level to language that is consistent with degree programs. The expectation of reasonableness remains and should take into account and be justified by various academic factors.

*The effective date for this change is **July 1, 2016**.*

~~**3-2-101. Teaching Load.** An instructor's teaching load, including night school, shall not exceed 32 clock hours per week, except that an overload of not more than one subject per term for additional compensation is permitted. Teaching loads may differ when using alternative methods of instruction and must be commensurate with the type of delivery method utilized. For purposes of this calculation, assigned courses offered by nontraditional or distance learning modes of instruction are deemed to consist of one clock hour per week for each unit of academic credit awarded.~~

Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

~~**3-3-303. Teaching Load.** An instructor's teaching load, including night school, shall not exceed 32 clock hours per week, except that an overload of not more than one subject per~~

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~~term for additional compensation is permitted. Teaching loads may differ when using alternative methods of instruction and must be commensurate with the type of delivery method utilized. For purposes of this calculation, assigned courses offered by nontraditional or distance learning modes of instruction are deemed to consist of one clock hour per week for each unit of academic credit awarded.~~

Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, and community relations responsibilities of the instructor.

E. FACULTY ASSIGNMENTS - APPLIED GENERAL EDUCATION

Explanation of Final Changes

The Council clarified its intent for general education teaching faculty at the non-degree level. This revision is consistent with the academic preparation requirements of applied general education faculty and standard general education faculty at the degree levels. This revision also includes the acceptance of completed doctoral coursework as qualifying credit hours to teach.

*The effective date for this change is **July 1, 2016**.*

3-2-104. Assignments. The requirements for full- and part-time faculty members teaching in the referenced subject areas are as follows:

(a) A bachelor's degree and appropriate coursework in the assigned subject are required for faculty members teaching applied general education and other academic courses. Instructors teaching general education shall hold a minimum of a master's degree. Instructors shall have a minimum of 18 semester or equivalent hours of coursework in their teaching discipline. At internationally based institutions, transcripts in languages other than English for general education instructors must be translated into English.

3-3-302. Assignments.

(a) A bachelor's degree and appropriate coursework in the assigned subject are required for faculty members teaching applied general education. Instructors at a minimum shall have earned 15 semester or equivalent hours of coursework through a combination of hours from an associate's, bachelor's, ~~and/or~~ master's, and/or doctoral level coursework in the area of their teaching assignment.

F. GLOSSARY OF DEFINITIONS

Explanation of Final Changes

The Council modified the language by removing dated terminology and clarifying the definitions listed in the Glossary.

*The effective date for this change is **July 1, 2016**.*

Lecture. A learning environment setting, ~~usually a classroom~~, where a teacher instructs students in the theory, principles, or history of an academic or vocational subject. To maximally benefit from such instruction, a student is assumed to have done outside preparation. Two hours of preparation for each hour of ~~lecture~~ instruction are generally assumed.

Laboratory. A learning environment setting, ~~usually with equipment~~, where students apply knowledge or instruction ~~acquired in another setting, usually a class lecture or outside reading~~, to enhance skills and solve problems. Normally, two hours of work in a laboratory environment, under the supervision of an instructor, ~~setting with an instructor present~~ has the credit equivalency of one hour of classroom lecture.

In-Service Training. Special planned and systematic experiences sponsored by an institution and related to curriculum and instruction that affect the majority of the faculty in a collective fashion. In-service education has as its major goal the updating of teachers in (1) subject matter, (2) curriculum concepts, (3) new theories and techniques of instruction, and (4) new educational media. ~~The most common activity is a lecture by an outside speaker on a subject related to curriculum, the institution, or a societal issue.~~

G. FACULTY PREPARATION

Explanation of Final Changes

The Council revised the listing of acceptable agencies for the evaluation of foreign credentials to also include the American Association of Collegiate Registrars and Admissions Officers (AACRAO).

*The effective date for this change is **July 1, 2016**.*

3-1-541. Faculty Preparation.

...Credentials of faculty who are graduates from institutions outside the United States must be evaluated by a member of the Association of International Credentials Evaluators

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(AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO) or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the credentials awarded by institutions in the United States.

... by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO) or the National Association of Credential Evaluations Services (NACES) to determine the equivalency of the credentials awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English.

H. ADMISSIONS AND RECRUITMENT

Explanation of Final Changes

The Council clarified its meaning related to the monitoring of admissions and recruitment. The modifications clarify that the Council requires these activities to be supervised by the institution. In addition, the institution may never delegate these activities to anyone whose economic incentives are to recruit prospects through means that are unethical or subject to public criticism or to admit ill-prepared applicants.

*The effective date for this change is **July 1, 2016**.*

3-1-410 – Admissions and Recruitment

It is up to an institution to establish its own admissions criteria. It is the responsibility of ACICS to ensure that all who are enrolled are accorded equal educational opportunity.

The ~~ultimate responsibility for the monitoring of the~~ activities of an institution's employees, vendors, contractors, or agents in the referral, recruiting, evaluation, and admissions processes is the responsibility of always remains with the institution. The activities of these individuals must be supervised by the institution. An institution may not delegate ~~without supervision~~ these activities to anyone whose economic incentives are to recruit prospects through means that are unethical or subject to public criticism or to admit ill-prepared applicants. The institution may not contract, directly or indirectly, with third parties who are generally unfamiliar with the institution. "Non-employees" are independent contractors who are not considered "employees" under the Internal Revenue Code.

Institutions participating in Title IV programs must be aware of regulations imposed by the U.S. Department of Education as they apply to recruiting practices.

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I. CAMPUS EFFECTIVENESS PLAN

Explanation of Final Changes

The Council revised the current language in a number of areas including the deletion of “institutional effectiveness” since each and every campus should have its own plan; deletion of the language referring to “centrally controlled institution” since this structure has not been implemented by ACICS; and revision of the list of elements to be evaluated to include “level of student satisfaction.” The “graduation rates [when available]” language has been temporarily deleted so the Council may issue further clarification. The revised language encourages campuses to include additional measures in their plan such as graduation rates, cohort default rates, and matrices of financial stability. To provide additional clarity in its intent, the Council also extensively revised the glossary definitions that relate directly to the Campus Effectiveness Plan and added a definition for “student satisfaction.”

*The effective date for this change is **July 1, 2016**.*

3-1-110 –Campus Institutional Effectiveness

An important indication of the overall effectiveness of an ACICS-accredited institution is the degree to which it meets its own predetermined educational outcomes. Each campus of an ACICS-accredited institution, consistent with its mission, shall develop and implement a Campus Effectiveness Plan that identifies how it plans to assess and continuously improve its educational programs and processes, and that addresses its ability to meet the educational and occupational objectives of its programs. In this document, each campus should attempt to incorporate short- term objectives to be accomplished in order to achieve the mission of the institution as it applies to the campus and its future goals.

3-1-111. *Campus and Institutional Effectiveness Plans.* Each campus shall have on file a Campus Effectiveness Plan (CEP). A main and its branches may share aspects of an CEP, such as the mission, but each main and branch campus is expected to have its own plan for effectiveness that describes the characteristics of the programs offered and of the student population, describes what types of data will be used for assessment, identifies outcomes, and states how continuous improvement will be made to improve or enhance outcomes at the campus. ~~A centrally controlled institution must also submit a consolidated Institutional Effectiveness Plan (IEP) containing information and data on the institution as a whole. The IEP of a centrally controlled institution is due on or before September 15 annually.~~

For the Campus Effectiveness Plan, the following six elements, at a minimum, will be evaluated for campus institutional-effectiveness:

1. student retention rates;
2. student placement rates;
3. level of student satisfaction;
4. level of graduate satisfaction;

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- 5. level of employer satisfaction; and
- ~~6.5. student learning outcomes; and~~
- ~~6. graduation rates [when available].~~

In compiling the data needed to assess the six elements, each campus shall identify and describe how the data were collected, the rationale for using each type of data, a summary and analysis of the data collected, and an explanation of how the data have been used to improve educational processes. Baseline data must be identified for each of the six elements.

For example, the data needed to demonstrate student learning outcomes includes baseline data and data to support that student learning has occurred. Examples of data may include, but are not limited to, course grades, GPA, CGPA, pre- and post-tests, entrance assessments, portfolios, standardized tests, professional licensure examinations, and other measures of skill and competency attainment. Placement data should not be used exclusively to validate student learning outcomes.

Each campus shall publish annual placement and retention goals. In formulating these goals, the campus shall take into account the retention and placement rates from the previous three Campus Accountability Reports and the specific activities that will be undertaken to meet those goals. The activities must demonstrate the campus' ability to maintain or improve retention and placement outcomes each year.

Institutions Campuses are encouraged to include additional information in their plans which is relevant to improving their overall effectiveness. elements in their plans, such as graduation rates, cohort default rates, and matrices of financial stability, which are relevant to improving their overall effectiveness.

~~For the Institutional Effectiveness Plan of a distributed enterprise institution, the following elements will be evaluated for institutional effectiveness, at a minimum:~~

~~PLANS~~

- ~~1. Mission and Objectives of the distributed enterprise institution~~
- ~~2. Strategic Planning Objectives~~
- ~~3. Long Range Planning Goals and Timelines for:~~
 - ~~a. Expansion and addition of campuses~~
 - ~~b. Student enrollment~~
 - ~~c. Retention and placement rates~~
- ~~4. Plans for Continuous Improvement~~

~~DATA~~

- ~~1. Three (3) years of retention and placement trend data for the institution~~
- ~~2. Three (3) years of retention and placement trend data for each program~~
- ~~3. Student demographic data for the institution~~
- ~~4. Comparison and analysis of baseline data between campuses~~

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- ~~5. Analysis of cohort default rates for the institution~~
- ~~6. Assessment of learning outcomes across the institution~~
- ~~7. Graduation Rates~~

PROCESS

- ~~1. Composition of the institution's IEP team~~
- ~~2. Institutional process for curriculum review~~
- ~~3. Compliance monitoring and internal controls~~

3-1-112. Implementation and Monitoring of the Campus and Institutional Effectiveness Plans. ~~Distributed enterprise institutions and a~~ All campuses shall document that the specific activities listed in the plan are carried out and that periodic progress reports are completed to ensure that the plan's activities are implemented. Appropriate individuals should be assigned responsibility for implementing and monitoring the Campus and Institutional Effectiveness Plans.

3-1-113. Evaluation of the Campus and Institutional Effectiveness Plans. ~~Distributed enterprise institutions and a~~ All campuses shall evaluate the plan, its goals, and activities at least annually. Evaluation requires the determination of initial baseline rates and a measurement of results after planned activities have occurred. ~~Distributed enterprise institutions and all campuses shall maintain documentation of historical outcomes and show evidence of how this documentation is used to achieve expected goals. Distributed enterprise institutions and a~~ All campuses should adjust their goals accordingly as a result of an evaluation of the Institutional and Campus Effectiveness Plans.

CORRESPONDING GLOSSARY OF DEFINITIONS

Employer Satisfaction. ~~The level of employer satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). Employer satisfaction and the level of satisfaction are defined by the campus institution based upon information collected, typically via a survey, on a regular basis from employers who have, or might, hired graduates from the of programs offered by the campus institution. Recommended information includes a survey of local employers as well as non-local employers who have hired graduates. Satisfaction questions should cover different aspects of career preparation in general (such as professionalism, foundational and soft skills), as well as specific skills in the particular field and the overall satisfaction of the employer with the preparation of graduates to perform tasks which utilize such skills provided by the institution.~~

Graduate Satisfaction Level. ~~The level of graduate satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). Graduate satisfaction and the level of satisfaction are defined by the campus institution based upon information collected on a regular basis from students who have graduated from the programs offered by the campus institution. Recommended information includes the results of surveys of all graduates who left the institution at least 30 days six months~~

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prior to being contacted. Satisfaction questions should cover different aspects of the program and the campus institution as well as overall satisfaction of the graduate with the preparation provided by the campus for the position provided by the institution.

Graduation Rates (when available). ACICS is developing a measure of graduation rates that is comprehensive and applicable at the program, campus, and institution level. Once the measure has been implemented through the Campus Accountability Report and validated, the graduation rate will be a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The comprehensive graduation rate is defined by ACICS in terms of the number of students who have completed or graduated during a reporting year, divided by the number of completers and graduates plus the number of students who have withdrawn, and expressed as a percent. The graduation rate, also called the graduates-to-leavers ratio, is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the *Guidelines and Instructions for the Campus Accountability Report*, which is available on the ACICS website. The detailed formula includes definitions, adjustments, and exclusions for calculating completers, graduates and withdrawals.

Outcomes, Campus. The effectiveness of an institution is determined by its outcomes. The intended result or end result of an activity or process in the assessment of effectiveness. In determining effectiveness, campuses institutions are required to evaluate the following outcomes: placement rates (in field, related field); retention rates; graduate licensure pass rates relative to minimum quantitative standards for state licensing examinations; employer satisfaction as determined by periodic surveys of those who employ graduates; graduate satisfaction as determined by periodic surveys of graduates; and student satisfaction as determined by periodic surveys of current students, and other student learning outcomes. Campuses Institutions also may use additional outcomes in evaluating effectiveness.

Placement Rate. The placement rate is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The Placement Rate is defined by ACICS in terms of the total number of completers and graduates minus those who are not placed (employed) in their field of study or a related field of study, divided by the total number of completers and graduates and expressed as a percent. The placement rate is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the *Guidelines and Instructions for the Campus Accountability Report*, which is available on the ACICS website. The detailed formula includes definitions of placed in field and related field placement, adjustments, and exclusions for students not available for placement. Three years of placement rate data are required in the CEP, and the institution is required to define and publish goals for placement rates. ACICS also publishes standards for campus level and program level placement rates which accredited institutions are expected to meet or exceed. Institutions falling below Council standards are subject to planning requirements, monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.

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Retention Rate. ~~The retention rate is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the Accreditation Criteria). The Retention Rate is defined by ACICS in terms of the total student enrollment, minus those students who withdraw, divided by the total student enrollment and expressed as a percent. The retention rate is calculated at both the program and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the *Guidelines and Instructions for the Campus Accountability Report*, which is available on the ACICS website. The detailed formula includes definitions, adjustments, and exclusions for calculating total enrollment and withdrawals. Three years of retention rate data are required in the CEP, and the institution is required to define and publish goals for retention rates. ACICS also publishes standards for campus-level and program-level retention rates which accredited institutions are expected to meet or exceed. Institutions falling below Council standards are subject to planning requirements, monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.~~

Student Learning Outcomes. Concise measurable statements of direct and indirect learning outcomes with assessments that specify what students will know, be able to do, or demonstrate as a result of a specific, planned education experience. Student learning Outcomes are expressed as measurable knowledge, skills, abilities or attitudes.

Direct and Indirect Assessment of Learning Outcomes. See Direct Assessment Competency-based Programs for examples.

Student Satisfaction: Student satisfaction and the level of satisfaction are defined by the campus based upon information collected, typically via a survey, on a regular basis from students who are currently enrolled at the campus. Satisfaction questions should cover different aspects of the current program of study and the services provided by the campus to prepare the student for the workforce.

J. BRANCH AND LEARNING SITE PROCEDURES (Effective January 1, 2016)

Explanation of Final Changes

The Council modified current language related to the approval of branch campuses and learning sites to be compatible with current ACICS procedures.

The effective date for this change is January 1, 2016.

2-2-110. Evaluation, Approval and Monitoring of Substantive Change Activity.

All activity for which approval is sought will be evaluated by ACICS before approval is granted. Following is a description of those evaluations.

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(a) *Branch Campus*. Initial inclusion of a branch campus within the scope of the accreditation of the institution may be granted by the President upon receipt of all required information. An institution proposing the initiation of a new location must follow the procedures as outlined by the Council and disclosed on its website. A new location must receive initial inclusion before advertising, recruiting, or enrolling students at the proposed location. The Council reserves the right to require a preliminary visit to any potential branch campus prior to the granting of initial inclusion.

A branch campus that is granted initial inclusion by the President will be required to undergo a verification visit within six months after the initial class start date. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

~~A decision regarding the final inclusion of a branch campus will be made by the Council in full session following a visit by an evaluation team. Prior to the final inclusion visit, the chief on-site administrator of the location will be required to attend an Accreditation Workshop and to submit additional documentation as outlined and disclosed on the ACICS Web site. The evaluation will normally be scheduled for twelve to eighteen months after the initial class start date and will be conducted by a team of evaluators determined by the size of the institution, the type and number of programs being offered, and other special circumstances. Identification of significant deficiencies during the verification or final inclusion visits can result in an immediate show cause directive to the institution.~~

Only after a determination of acceptability, ~~either at the initial or final inclusion level~~, and notification to the institution of the decision, may the institution consider an a branch campus to be included within the scope of the institution's grant of accreditation. If approval is withheld, the withholding may be treated as a deferral or a denial, based on circumstances, and the institution may exercise its due process rights as outlined in Title II, Chapter 3.

(b) *Learning Site*. The President is authorized to evaluate and approve additions to a main or branch campuses that are apart from the primary location of that campus. Educational activities at a learning site are eligible to be evaluated for inclusion within the scope of the accreditation of the managing campus provided that the learning site has been established to meet a specific educational need or condition and is authorized by the appropriate governmental education authority, if applicable.

The managing campus proposing the initiation of a learning site must submit a Learning Site Application. The managing campus must assure the Council that the educational activities at the learning site complement the overall objectives of the institution. Based on its review of the application materials, ACICS may (1) grant ~~final~~ inclusion of the learning site or (2) deny the application.

A learning site that is granted ~~final~~ inclusion by the President will be required to undergo a verification visit within six months after the initial class start date if 50% or more of a program will be offered at the site. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

All additions to the campuses of an institution are evaluated during an institution's regular evaluation for a renewal of accreditation.

K. FACULTY ASSIGNMENTS AT THE DOCTORAL LEVEL (Effective January 1, 2016)

Explanation of Final Changes

The Council has clarified current language related to the faculty assignments at the doctoral level. Specifically, faculty teaching at this level must have a doctoral or professional degree related to the courses taught and must maintain current professional certification, where applicable. In addition, the institution must demonstrate that faculty members are engaged in scholarly research and that faculty members are encouraged to publish in professional journals. For adjunct faculty, research connected with their primary professional connections will apply.

*The effective date for this change is **January 1, 2016**.*

~~**3-7-502. Assignments.** Faculty shall be assigned in terms of their major and minor areas of academic preparation and related experience. The size of the faculty shall be appropriate for the enrollment. All doctorate program faculty should have appropriate graduate and terminal degrees. All courses are to be taught by faculty possessing terminal degrees. Professional certification is not a substitute for a terminal degree. The institution also should encourage faculty members to engage in practical or scholarly research and to publish in professional journals.~~

~~The principal faculty members must possess doctoral/terminal professional degrees from accredited institutions. These individuals also must demonstrate expertise in the field of study taught and possess applicable experience in participating in a doctorate degree program.~~

All doctoral degree courses shall be taught by faculty possessing doctoral or terminal professional degrees, related to the courses taught, from accredited or government-recognized international institutions. These individuals also must demonstrate expertise in the field of study taught, possess applicable professional experience for participating in a doctoral degree program and maintain current professional certification in their discipline, where applicable.

Faculty shall be assigned in terms of their major and minor areas of academic preparation, related professional experience, and appropriate required professional certification to practice in the field. The size of the faculty shall be appropriate for the enrollment in the program. The institution shall demonstrate that faculty members are engaged in practical or scholarly research and are encouraged to publish in professional journals.

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2. For Information Only

A. ACICS WEB SITE

Please visit the ACICS website. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: The institutional ACICS ID should be used on all correspondence to and from ACICS. If you have questions about your ID code, please send an email to ebiz@acics.org.

B. 2016 WORKSHOP SCHEDULE

Please check the ACICS website for up to date information on workshops.

<i>INITIAL ACCREDITATION WORKSHOP</i>		
Initial Accreditation Workshop	March 3, 2016	ACICS Office
Initial Accreditation Workshop	May 10, 2016	Fort Worth, TX
Initial Accreditation Workshop	October 4, 2016	Pasadena, CA
<i>RENEWAL WORKSHOP</i>		
Renewal Accreditation Workshop	March 4, 2016	ACICS Office
Renewal Accreditation Workshop	March 24, 2016	Puerto Rico
Renewal Accreditation Workshop	May 10, 2016	Fort Worth, TX
Renewal Accreditation Workshop	August 25, 2016	Indianapolis, IN
<i>ADDED VALUE WORKSHOP</i>		
Added Value Workshop – Campus Effectiveness Plan	August 26, 2016	Indianapolis, IN

C. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Schools play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you operate, please let us know about them. Send an email to Mr. Quentin Dean at qdean@acics.org and let him know the source of the information and when it appeared.

D. ACICS AWARE WEBINAR

An AWARE webinar will be held on **Thursday, January 21, 2016 at 2:00pm**. This webinar will focus on information presented in the September 2015 Memorandum to the Field. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Mr. Ian Harazduk at iharazduk@acics.org.

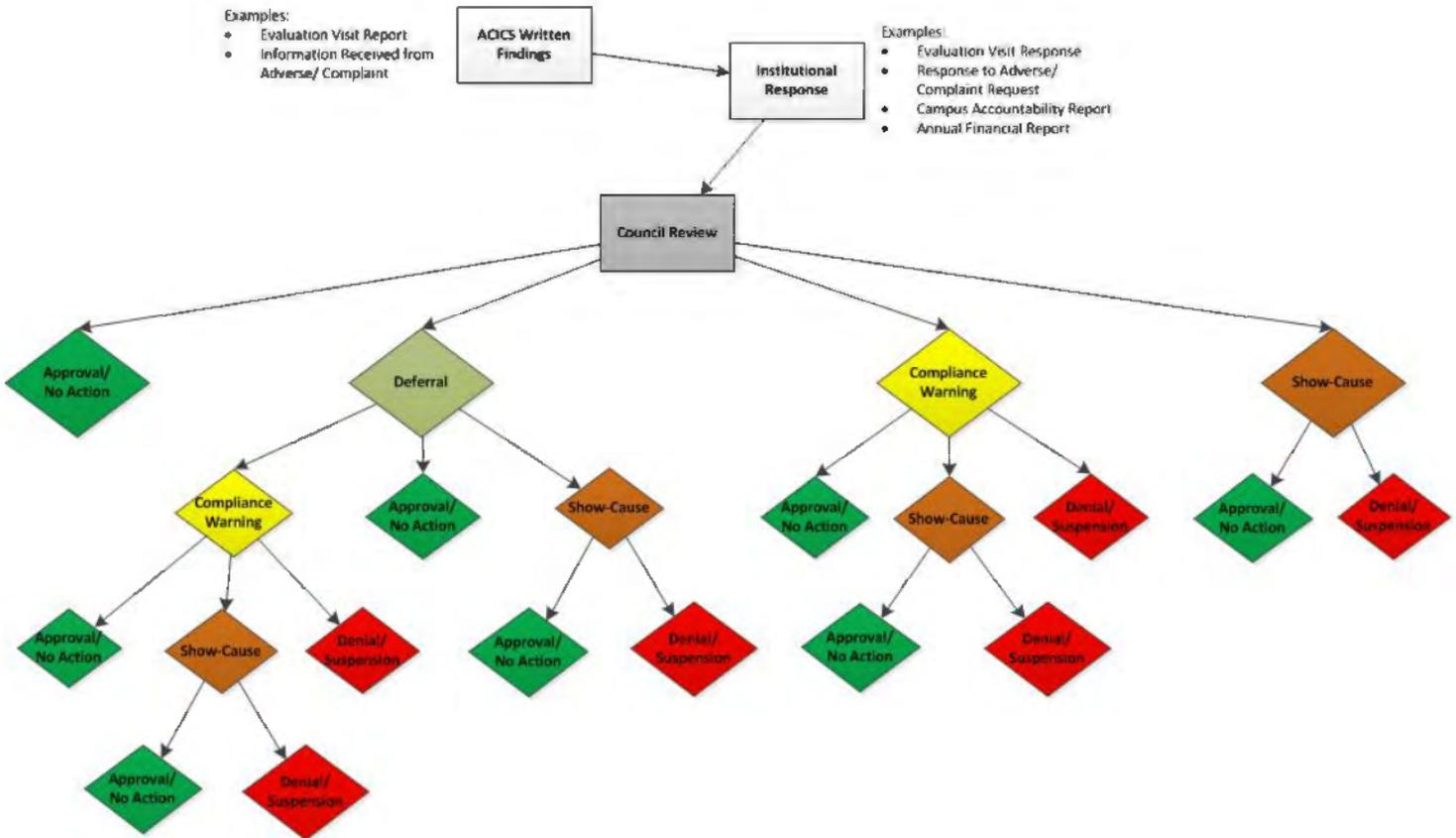
E. CHANGES TO THE MEMORANDUM TO THE FIELD

ACICS has developed a systematic process for policy development which will allow more time for policy research and discussion. Beginning in January 2016, the Memorandum to the Field will be generally disseminated in January and September. Proposed criteria changes considered by the Council will be detailed in the September Memorandum to the Field, along with an invitation for comments from the field on the proposed changes. Criteria changes voted as final by the Council will be detailed in the January Memorandum to the Field. Unless otherwise specified, final criteria voted by the Council in December and published in the January memorandum to the field will go into effect **July 1**. Additionally, AWARE webinars will be held in September and January.

Appendix A

Council Action Process

PROPOSED



FEBRUARY 2016 ACICS COUNCIL MEETING
 POLICY REVIEW AND PLANNING
 FONTAINEBLEAU MIAMI BEACH
 MIAMI BEACH, FLORIDA
 FEBRUARY 8-10, 2016
 AGENDA

Monday, February 8, 2016

Schedule	Event	Topics & Presenters	Subtopic/Criteria	Tab/Page	Location
3:00 – 5:00 PM	Hot Topic	The Changing Dynamics of Student Achievement (Panel)			Splash room
5:00 – 7:00 PM	Reception				Sea Green Lawn

Tuesday, February 9, 2016

Schedule	Event	Topic & Presenters	Subtopic/Criteria	Tab/Page	Location	Preparer
8:00 – 9:00 AM	<i>BREAKFAST</i>				Scarpetta	
9:00 – 12:00 NOON	Call to Order Introduction	Chair's welcome and comments (Leak)			Reflect	-
		President's welcome and comments (Gray)				-
	Preliminary Items	Review of "Typical Policy Development and Implementation on Plan" (Gray, Gurubatham)				-
		Report on the organization of the SRAC (Walters-Gilliam)				Perlitter
		CFPB Update (Gray)				Al
		DOE Re-recognition/CHEA Petition Update (Bieda)				Tony

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	Strategic Discussion Items	Public Perception and Key Stakeholders	<ul style="list-style-type: none"> • Media • Regulatory Agencies • Member Institutions • Students 		AI w/ Joseph
		ACICS Policies Affected by External Scrutiny	<ul style="list-style-type: none"> • Student Achievement and Outcomes Verification • Evaluation Visits • Quality Enhancement • Continuous Improvement • Consumer Protection 		AI w/ Joseph
12:00 – 1:00 PM	<i>LUNCH</i>				Scarpetta
1:00 – 5:00 PM	Strategic Policy Discussion Items	Interim Quality Assurance Reviews	<ul style="list-style-type: none"> • Unannounced/Limited Announced Visits • Consideration of Removal QAM-Readiness Visit • Adverse Scoring Rubric • Secret Caller Program 		Ian w/ Tony
		Student Achievement Outcomes	<ul style="list-style-type: none"> • Placement Definition: <ul style="list-style-type: none"> ○ Completers ○ Employment v. Placement ○ Pre-Graduation Employment ○ Predominant Component ○ Length of Employment • Graduation Rates • Student Achievement for 		Sue/Terron

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			Online Institutions <ul style="list-style-type: none"> • Student Achievement for International Institutions 			
		Consumer Protection Initiatives (Bieda)	<ul style="list-style-type: none"> • Institutional Performance Disclosure • Open admissions v. admissions of those likely to be successful 			Tony w/ Ian
		Financial Review Policies (Olszewski)	<ul style="list-style-type: none"> • Defining indicators of “institutional financial stability” 			Jeff/Katy

Wednesday, February 10, 2016

Schedule	Event	Topics & Presenters	Subtopic/Criteria	Tab/Page	Location	Preparer
8:00 – 9:00 AM	BREAKFAST				Scarpetta	
9:00 - 12:00 NOON	Policy Discussion Items	Mission Statement is Career-Related	Section 3-1-100		Reflect	Sue
		Identifying Decision-Makers at the Institution				Sue
		Debarment Policy	Section 2-3-900			Ian
		Probation Language	Section 2-3-240, 2-3-241, 2-3-242, and 2-3-243			Ian
		Campus Effectiveness Plan	Sections 3-1-110, 3-1-111, 3-1-112, and 3-1-113 (Appendix K)			Perlitter
		Consistency on Visits across Multi-Campus				Perlitter/Ian

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Schedule	Event	Topics & Presenters	Subtopic/Criteria	Tab/Page	Location	Preparer
		Institutions				
12:00 – 1:00 PM	LUNCH				Scarpetta	
1:00 – 4:00 PM	Systematic Review Discussion Items	Library and Instructional Resources	<ul style="list-style-type: none"> Physical v. online resources Staffing Standards at different credential levels 		Reflect	Terron
		Prerequisites for Master's Degree Programs Accredited by Professional/Programmatic Agencies	Section 3-6-601			Joseph
		Re-define "Additional Space"	Glossary			Sue
		Define "Basic" Records	Section 3-1-303			Ian
		Faculty Field/Subject Preparation at all Credential Levels	Sections 3-2-102, 3-2-103, 3-3-302, 3-4-302, and 3-5-302			Terron
		Workshop Attendance Timeframe	Section 2-1-100			Perlitter
		Satisfactory Academic Progress Policy Requirements	Appendix D, Items 12 and 15: <ul style="list-style-type: none"> Extended Enrollment Transfer of Credit 			Perlitter
		Catalog Requirements	<ul style="list-style-type: none"> Transfer of Credit Articulations Agreements Consortium Agreements 			Ian

FEBRUARY 2016 ACICS COUNCIL MEETING
 POLICY REVIEW AND PLANNING
 FONTAINEBLEAU MIAMI BEACH
 MIAMI BEACH, FLORIDA
 FEBRUARY 8-10, 2016
 AGENDA

Schedule	Event	Topics & Presenters	Subtopic/Criteria	Tab/Page	Location	Preparer
		Transfer Credits from Unaccredited Institutions	Section 3-1-413			Perlitter
		Externships under the Supervision of Faculty	Glossary			Perlitter



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM Accrediting Council for Independent Colleges and Schools
DATE: April 19, 2016
The Memorandum to the Field contains proposed criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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1. Proposed Criteria Revisions

At its April 2016 meeting, the Council reviewed specific areas of the ACICS *Accreditation Criteria* outlined in Section I and approved the revisions as **proposed** (new language is underlined, ~~deleted language is struck~~). **Public comment on these revisions is requested through the ACICS Comment Survey explained at the end of the memorandum.**

A. DEFINITION OF ACADEMIC QUALITY

Explanation of Proposed Changes

The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The proposed language was modified and expanded from current language listed in an ACICS monograph. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

The effective date for this proposed change is July 1, 2016.

Chapter 1 – An Overview of the Council

Statement of 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 accrediting process of quality assurance and enhancement as well as ethical business and educational practices.

Introduction Definition of Accreditation

Accreditation is an independent appraisal of an institution during which the institution's overall educational quality (including outcomes), professional status among similar institutions, financial stability, and operational ethics are self-evaluated and judged by peers. It is a voluntary activity separate and distinct from business licensing, authority to award educational credentials, and eligibility to administer student financial assistance.

Definition of Academic Quality

ACICS defines academic quality as the overall performance of the institution in the context of its mission and as measured by the extent to which the institution achieves its intended student learning and student success outcomes.

Student learning outcomes involve assessment of skill and competency attainment. Student success outcomes include student retention or persistence; employment or placement; and student, graduate and employer satisfaction.

The effectiveness of the institution is demonstrated by its compliance with accreditation standards as well as its continuous striving for enhancement of quality. ACICS assesses academic quality in the following areas: mission and objectives; campus effectiveness planning; student outcomes; financial stability; recruitment and admission practices; organizational structure and administration; student services; academic program and curriculum; quality of faculty and instruction; physical facilities; library and learning resources; and publication and disclosure of student achievement.

1-1-100 – Bylaws

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1-1-200 – Recognition

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1-1-300 – Public Participation

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B. DATA INTEGRITY STANDARD

Explanation of Proposed Changes

The Council proposes a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

In addition, as a procedural measure beginning in the Spring 2016 cycle, the Council will identify an evaluator at each evaluation site visit with the primary role of verifying reported institutional data.

*The effective date for the proposed policy change is **July 1, 2016**.*

3-1-203. Data Integrity.

All performance and institutional data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance, which is subject to review for integrity, accuracy, and completeness. The Council has the discretion to independently review performance data upon which it relies, in part, on making an accrediting decision.

3-1-203204. Financial Stability.

...

C. PROBATION STANDARDS

Explanation of Proposed Changes

The Council proposes to include the “Probation” action within the current Council Action Process for non-compliant actions. Probation may be ordered when the institution has consistently demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The action may be ordered following a show-cause directive or if the institution is appealing a denial or withdrawal action. The Council also proposed to clarify the timeframe by which an institution may remain on this status in line with its maximum timeframe procedures listed in Title II, Chapter 3, Introduction.

The effective date for this proposed change is July 1, 2016.

2-3-240 – Probation

~~Probation is a status that the Council may impose on an institution if the institution is unable to demonstrate that it consistently operates in accordance with the *Accreditation Criteria*.~~

When the Council determines that an institution is not in compliance, and has demonstrated that it cannot consistently operate in compliance with the *Accreditation Criteria*, the institution will be provided in writing with the areas of noncompliance and may be placed on a probation status.

2-3-241. Imposition. Probation may be imposed by the Council either following ~~when it continues a show-cause directive after at least one hearing either in person or in writing,~~ or after an institution has notified the Council that it intends to appeal a denial or withdrawal action.

2-3-242. Result of Probation. The Council will not accept any applications for new programs or new campuses from any institution on probation unless the institution receives approval in advance to submit such an application.

2-3-243. Probation Lifted. ~~Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show cause directive has been vacated.~~ When the reasons for the probation have been satisfied, the probation may be lifted by ACICS (See Title II, Chapter 3, Introduction). The Council may order a special visit at the institution’s expense before lifting probation.

2-3-244. Notification of Probation. The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies,

and the public of its decision to place an institution on probation. The institution is required to notify immediately in writing its current and prospective students that it has been placed on probation by its accrediting agency.

D. RECRUITMENT ACTIVITIES REVIEW

Explanation of Proposed Changes

The Council proposes that each institution must have a documented process for ensuring that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The proposed change will require the institution to maintain documentation of its review and oversight measures of its admissions and recruitment personnel.

*The effective date for this proposed change is **July 1, 2016**.*

In addition, the Council plans to conduct research and survey institutions on its current practices for ensuring compliance with admissions and recruitment standards and, based on its findings, will issue a best practices guidance document.

Section 3-1-412(a): An institution shall have a documented process to ensure that any person or entity engaged in admissions or recruitment activities on its behalf is communicating current and accurate information regarding courses and programs, student achievement disclosures, services, tuition, terms, and operating policies.

E. INSTITUTIONAL PERFORMANCE DISCLOSURES

Explanation of Proposed Changes

The Council proposes fortifying its policy regarding public disclosure of student achievement data. The proposal requires that information related to student achievement must be disclosed at the campus level (and not at the institution-wide level) and that, at a minimum, the campus provides its retention, placement, and licensure exam pass rates.

*The effective date for this proposed change is **July 1, 2016**.*

3-1-704. Performance Information. ~~Institutions~~ Each campus shall routinely provide reliable information to the public on ~~their~~its performance, including student achievement as ~~determined by the institution~~ information, that includes, at a minimum, retention, placement, and licensure examination pass rates.

ACICS MEMORANDUM TO THE FIELD

April 19, 2016

In addition, the Council has developed a standard disclaimer statement that will be required of all institutional disclosures of student achievement that are based on data submitted to ACICS, including those data derived from the Campus Accountability Report. The Disclaimer statement would be included in Appendix C and read as follows:

Appendix C – Institutional Publication Requirements

Performance Information Disclosure

“The student achievement rates for retention, placement, and/or licensure examination disclosed above are provided for information purposes only. They are based on data submitted to ACICS in fulfillment of accountability requirements but have not been 100% verified or tested for complete accuracy. Students should give the information appropriate weight in making an enrollment decision.”

...

Statement of Accreditation

...

F. PLACEMENT DEFINITION

Explanation of Proposed Changes

The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council now proposes to include a succinct definition of placement within the Glossary of the Accreditation Criteria.

*The effective date for this proposed change is **July 1, 2016**.*

Placement. Working in the field of study or acquiring a credential that directly benefits the graduate’s existing employment.

G. DEBARMENT POLICY

Explanation of Proposed Changes

The Council proposes to revise its current procedures for appealing a debarment action. The proposal will clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

The effective date for this proposed change is July 1, 2016.

2-3-900 – Debarment

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-401, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

The Council will notify the person(s) or entity whom it intends to bar as the result of denial or suspension action within four months following the loss of the institution's accreditation. It will notify the person(s) or entity whom it intends to bar as the result of the closing of an institution within a reasonable period of time following the closure. In each case, the Council will forward an intent to bar notice by both electronic and certified mail to the last institutional mailing address known to the Council, unless the Council has received updated mailing information following the institution's closure or loss of accreditation. Those individuals or entities will be considered notified when the Council has forwarded the intent to bar notice in accordance with these procedures.

The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing or in person to ~~challenge~~ appeal the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to ~~challenge~~ appeal the intent to bar, the person(s) or entity must inform the Council office in writing within ten days of receipt of the notice as to whether they will ~~challenge~~ appeal the intent to bar in writing.

A debarment order may be issued by the Council as a result of its consideration of the facts presented. ~~Notice of t~~ The Council's decision will be sent to the individual(s) by electronic and certified mail following their ~~challenge~~ appeal before the Council.

The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification. The Council decision is also final following appeal.

The Council retains final discretion to establish the terms and length of the debarment. The length of debarment will vary depending on the circumstances that led to the debarment decision, but it will be for a period of at least three years. Individual circumstances may justify a longer period of debarment.

~~Person(s) or entities barred by the Council may appeal this decision to the Council in accordance with such debarment appeals procedures as the Council may establish. The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification or if the Council affirms its decision following appeal, and no additional appeal rights are available under these procedures.~~

H. ADMISSIONS REQUIREMENTS FOR PROFESSIONAL MASTER'S DEGREE PROGRAMS

Explanation of Proposed Changes

The Council proposes to clarify language related to the admissions requirements for professional master's degree programs which lead to certification or licensure following graduation. Currently, the Council requires that, if an institution admits a student into a master's degree without a baccalaureate degree, the student must complete the requirement of a baccalaureate degree prior to completion or concurrently with the award of the master's degree. The baccalaureate degree is often not required for a professional master's degree by specialized accrediting agencies; therefore, the Council has clarified the standard to allow for these circumstances.

*The effective date for this proposed change is **July 1, 2016**.*

3-6-601. Enrollment Prerequisites. The threshold admission requirement to a master's degree program is a baccalaureate degree.

If admission to a professional program is granted without a baccalaureate degree, the burden is on the institution to demonstrate and justify that the alternate admission requirement is accepted by a recognized licensing or specialized accrediting agency and is common practice among accredited institutions of higher education. In such cases, admission may be granted only to eligible students who have completed, at a minimum, an associate's degree or equivalent. If the institution chooses to award a suitable baccalaureate degree upon completion of specified requirements or concurrently with the award of the professional master's degree, the baccalaureate degree curriculum must be approved by the Council.

~~In instances where a baccalaureate degree is not used as the threshold for admission, the following conditions must be met: (a) admission to the program may be granted only to eligible students who have completed at a minimum an associate degree or equivalent; (b) the program must ensure that a baccalaureate degree, which meets ACICS standards, is awarded upon completion of baccalaureate degree requirements or concurrently with the award of the master's degree; and (c) the baccalaureate degree program must include in its curricular requirements sufficient and appropriate bridge to master's level courses in the field of study and must be approved by ACICS.~~

2. For Information Only

A. BOARD OF ETHICS

The ACICS Board of Directors applies its authority and credibility as a body of independent, ethical, and expert members in arriving at accreditation standards, procedures, and decisions. In order to further protect that independence and integrity, it has added a new factor that may trigger the resignation of a Commissioner or Director, and has strengthened the method by which it reconciles conflicts of interests or perceived breaches of integrity. The newly established Board of Ethics will consist of one standing Board member and two independent, public members, as described below.

Article IV

Elections, Terms, Vacancies, Removal, Resignations, and Compensation

Section 7–Resignations. Resignation from service as a commissioner and Director may be voluntarily tendered at any time. The resignation becomes effective upon receipt of written notice by the Chair of the Board and Council or the President. Automatic tendering of resignation is required under the following circumstances or conditions:

...

(j) the commissioner is employed by an institution that is deemed to be under sustained and serious scrutiny regarding non-compliance with ACICS standards and requirements.

Article V

Committees

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

...

(e) The Board of Ethics shall consist of three individuals selected by the Board consisting of two independent, public members and one member affiliated with an ACICS institution. 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.

B. INTERIM ON-SITE EVALUATIONS

The Council has strengthened its current process for conducting interim on-site evaluation visits between renewal of accreditation periods. Any time ACICS conducts an on-site visit, the evaluation team will review an institution's overall effectiveness in key areas such as administrative capability, effectiveness planning, admissions and recruitment practices, recordkeeping, faculty qualifications, etc. This process will be incorporated into the existing quality assurance monitoring program as well as for institutions that are determined to be at-risk as a result of student achievement indicators, financial conditions,

ACICS MEMORANDUM TO THE FIELD

April 19, 2016

complaint or adverse information, extensive substantive changes or enrollment growth, or other factors as determined by the Council.

The interim evaluation process will begin in the **May/June 2016**.

C. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Friday, May 6, 2016**. The link to comment of these proposed changes is <https://www.surveymonkey.com/r/MTTF042016>.

D. ACICS AWARE WEBINAR

An AWARE webinar will be held on **Thursday, April 21, 2016 at 2:00pm**. This webinar will focus on information presented in the April 2016 Memorandum to the Field. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar or if you have specific questions about the material presented, please send an email to Mr. Ian Harazduk at iharazduk@acics.org. ACICS is eager to respond to all questions related to this communication; therefore, if you have any questions prior to the AWARE Webinar, please send an email to Mr. Ian Harazduk at iharazduk@acics.org, so that these responses can be prepared and shared during the webinar.

E. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: The institutional ACICS ID should be used on all correspondence to and from ACICS. If you have questions about your ID code, please send an email to ebiz@acics.org.

F. 2016 WORKSHOP SCHEDULE

Renewal of Accreditation Workshop

Renewal of Accreditation Workshop	May 10, 2016	Ft. Worth, TX
Renewal of Accreditation Workshop	August 25, 2016	Indianapolis, IN

Initial Accreditation Workshop

Initial Accreditation Workshop	May 10, 2016	Ft. Worth, TX
Initial Accreditation Workshop	October 4, 2016	Pasadena, CA

Adding Value Workshop

Adding Value: Campus Effectiveness Plan	August 26, 2016	Indianapolis, IN
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G. ACICS ANNUAL MEETING

ACICS Fundamentals for New Members and Personnel Special Session

These five free sessions provide guidance and clarity on the fundamentals of maintaining compliance with the ACICS Accreditation Standards and Criteria once an initial accreditation has been awarded or upon initial assumption of a leadership role at an ACICS-accredited institution. Sessions include technical and annual reporting requirements, managing institutional change and growth, institutionalizing compliance, partnering with ACICS, and information on accessing Federal financial aid.

This event is free with confirmed registration to the Annual Conference and **open only to initial grant awardees and new campus personnel**. To register, please contact Ms. Perliter Walters-Gilliam (pwgilliam@acics.org).

Responding to Council Findings Special Session

Findings from a site visit, or areas requiring additional information on a deferral motion letter, are an understandable source of concern to institutions. In some instances, these findings may be outside the control of the institution and may not impair academic quality. However, a response to the Council is necessary to demonstrate and validate compliance with the identified area(s) of the Accreditation Criteria. This free session will shed light on

ACICS MEMORANDUM TO THE FIELD

April 19, 2016

the team's evaluative process which may result in said findings and how the institution should ensure its response is appropriate and accurate to address the issue(s).

This event is free with confirmed registration to the Annual Conference. To register, please contact Mr. Ian Harazduk at iharazduk@acics.org.



THE ACICS ANNUAL CONFERENCE AND BUSINESS MEETING

May 11 – 13, 2016

Fort Worth, Texas

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H. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Schools play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you operate, please let us know about them. Send an email to Mr. Quentin Dean at qdean@acics.org and let him know the source of the information and when it appeared.

ACICS MEMORANDUM TO THE FIELD

April 19, 2016

3. Comment Survey – Proposed Criteria Revisions

ACICS is collecting all comments from the field on proposed Criteria revisions through an electronic survey. Please find the survey link below:

<https://www.surveymonkey.com/r/MTTF042016>

Please respond by Friday, May 6, 2016.

If you have any questions about the memorandum to the field or the call for comment, please contact:

Mr. Ian Harazduk

Senior Manager, Policy and Compliance

Phone (202) 336-6795

fieldcomments@acics.org



ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM Accrediting Council for Independent Colleges and Schools
DATE: May 20, 2016
The Memorandum to the Field contains final criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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1. Final Criteria Revisions (Effective July 1, 2016)

At its May 2016 meeting, the Council reviewed specific sections of the ACICS Accreditation Criteria for the purpose of enhancing and fortifying its program of review of colleges and schools offering programs that prepare students for employment in professional, technical and occupational fields. The language contained in the following sections reflect content and policy previously reviewed by the Council, as well as consideration of comments and recommendations derived from a broad cross-section of ACICS stakeholders, including students, faculty, school administrators, policy advocates and others.

The ACICS Accreditation Criteria will be updated to reflect all final criteria revisions effective July 1, 2016. To review the revised copy of the Accreditation Criteria before July 1, please visit the ACICS website at www.acics.org.>About Us>Publications>Accreditation Criteria.

The following criteria were previously reviewed and have been accepted as **final** and the effective date is **July 1, 2016** (new language is underlined, ~~deleted language is struck~~).

In addition, as published in the January 13, 2016 Memorandum to the Field, the following *Criteria* revisions will also be effective July 1, 2016:

- Unannounced Visits
- Community Resources
- Teaching Loads
- Faculty Assignments – Applied General Education
- Glossary – Lecture, Laboratory, In-Service Training
- Faculty Preparation
- Admissions and Recruitment
- Campus Effectiveness Plan

For details on these revisions previously announced, please visit our website at: [Memorandum to the Field](#).

A. DEFINITION OF ACADEMIC QUALITY

Explanation of Final Changes

The Council determined that it was important to provide a clear definition of academic quality within the Accreditation Criteria. The definition provides guidance on the measures of academic quality and how an institution and ACICS will assess these measures. The Council also determined that it was important to place the ACICS statement of mission (currently placed under Title I, Chapter 2, Introduction) under Title I, Chapter I of the Accreditation Criteria.

The effective date for this change is July 1, 2016.

Chapter 1 – An Overview of the Council

Statement of 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 accrediting process of quality assurance and enhancement as well as ethical business and educational practices.

Introduction Definition of Accreditation

Accreditation is an independent appraisal of an institution during which the institution's overall educational quality (including outcomes), professional status among similar institutions, financial stability, and operational ethics are self-evaluated and judged by peers. It is a voluntary activity separate and distinct from business licensing, authority to award educational credentials, and eligibility to administer student financial assistance.

Definition of Academic Quality

ACICS defines academic quality as the overall performance of the institution in the context of its mission and as measured by the extent to which the institution achieves its intended student learning and student success outcomes.

Student learning outcomes involve assessment of skill and competency attainment. Student success outcomes include student retention or persistence; employment or placement; and student, graduate and employer satisfaction.

The effectiveness of the institution is demonstrated by its compliance with accreditation standards as well as its continuous striving for enhancement of quality. ACICS assesses academic quality in the following areas: mission and objectives; campus effectiveness planning; student outcomes; financial stability; recruitment and admission practices; organizational structure and administration; student services; academic program and curriculum; quality of faculty and instruction; physical facilities; library and learning resources; and publication and disclosure of student achievement.

1-1-100 – Bylaws

....

1-1-200 – Recognition

...

1-1-300 – Public Participation

...

B. DATA INTEGRITY STANDARD

Explanation of Final Changes

The Council included a new standard in order to provide explicit requirements for its expectations as it relates to the truthfulness, reliability, and accuracy of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements. Following the comments from the field, the Council clarified the expectation that all data reported to ACICS must reflect accurate information and is subject to review.

*The effective date for the change is **July 1, 2016**.*

3-1-203. Data Integrity.

All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness.

3-1-203~~204~~. Financial Stability.

...

C. RECRUITMENT ACTIVITIES REVIEW

Explanation of Final Changes

The Council maintains its requirement that each institution must ensure that any person or entity engaged in admissions or recruitment practices is communicating current and accurate information about the institution and its operations. The Council added the explicit requirement that the institution must ensure that student achievement disclosures (as described in Section 3-1-704) are accurate. Following comments from the field, the Council clarified the language which states that the institution must maintain documentation that it systematically monitors its recruitments activities.

*The effective date for this change is **July 1, 2016**.*

Section 3-1-412(a): An institution shall ensure that any person or entity engaged in admissions or recruitment activities on its behalf is communicating current and accurate information regarding courses and programs, student achievement disclosures (See Section 3-1-704), services, tuition, terms, and operating policies. The institution must maintain documentation that demonstrates that it systematically monitors its recruitment activities.

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D. INSTITUTIONAL PERFORMANCE DISCLOSURES

Explanation of Final Changes

The Council has fortified its policy regarding public disclosure of student achievement data. The language requires that information related to student achievement must be disclosed at the campus- and program-level (and not at the institution-wide level if a multi-campus institution) and that, at a minimum, each campus and each program (at each campus) provides its retention, placement, and licensure exam pass rates (where applicable). Following comments from the field, the Council also clarified that this data should be the information that is reported on its most recent Campus Accountability Report.

*The effective date for this change is **July 1, 2016**.*

3-1-704. Performance Information. Institutions Each campus shall routinely provide reliable information to the public on ~~their~~ its performance, including student achievement as determined by the institution information, that includes, at a minimum, retention, placement, and licensure examination pass rates (where applicable). The information provided shall be for the entire campus and for each program as reported to ACICS in its most recent Campus Accountability Report.

In addition, the Council developed a standard disclaimer statement that will be required of all institutional disclosures of student achievement. Following comments from the field, the Council simplified the statement, which requires institutions to clearly identify that the information is data submitted to ACICS in its Campus Accountability Report. The Disclaimer statement is included in Appendix C and reads as follows:

Appendix C – Institutional Publication Requirements

Performance Information Disclosure

“These are the data reported to ACICS by the institution in its most recent Campus Accountability Report.”

...

Statement of Accreditation

...

E. PLACEMENT DEFINITION – GLOSSARY

Explanation of Final Changes

The Council has guidelines in which institutions must comply regarding the calculation of placement rates. The Council has included a succinct definition of placement within the Glossary of the Accreditation Criteria.

*The effective date for this change is **July 1, 2016**.*

Based on comments from the field and ACICS initiative to enhance the reliability of information upon which ACICS uses to make an accrediting decision,, the Council has authorized a comprehensive review of all the definitions, reporting templates and training support for the development, tracking, reporting and verification of student achievement data, including the Campus Accountability Report Guidelines, retention data, placement data, and licensure examination pass rate data. The reform will be announced in advance of the next CAR reporting interval.

Placement. Working in the field of study or acquiring a credential that directly benefits the graduate's existing employment.

F. DEBARMENT POLICY

Explanation of Final Changes

The Council revised its current procedures for appealing a debarment action. The procedures clarify that an individual or entity that receives an intent to bar notice will have one opportunity, either in writing or in person, to appeal that notice, which may include additional information for Council consideration. If the individual or entity chooses to appeal the notice, the Council will make a final decision on whether to issue a debarment order and determine the terms and length of that debarment following the appeal.

*The effective date for this change is **July 1, 2016**.*

2-3-900 – Debarment

The Council may bar a person or entity, including spouses and closely related family groups as defined in Section 2-2-401, from being an owner, senior administrator, or governing board member of an ACICS-accredited institution if that person or entity was found guilty of fraudulent or criminal behavior; was debarred by a government agency or an accrediting agency; or was an owner, senior administrator, or governing board member of an institution that lost its accreditation as a result of a denial or suspension action or that closed without providing a teach-out or refunds to students matriculating at the time of closure.

ACICS MEMORANDUM TO THE FIELD

May 20, 2016

The Council will notify the person(s) or entity whom it intends to bar as the result of denial or suspension action within four months following the loss of the institution's accreditation. It will notify the person(s) or entity whom it intends to bar as the result of the closing of an institution within a reasonable period of time following the closure. In each case, the Council will forward an intent to bar notice by both electronic and certified mail to the last institutional mailing address known to the Council, unless the Council has received updated mailing information following the institution's closure or loss of accreditation. Those individuals or entities will be considered notified when the Council has forwarded the intent to bar notice in accordance with these procedures.

The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing or in person to ~~challenge-appeal~~ the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to ~~challenge-appeal~~ the intent to bar, the person(s) or entity must inform the Council office in writing within ten days of receipt of the notice as to whether they will ~~challenge-appeal~~ the intent to bar in writing.

A debarment order may be issued by the Council as a result of its consideration of the facts presented. ~~Notice of t~~The Council's decision will be sent to the ~~individual(s)~~ person(s) or entity by electronic and certified mail following their ~~challenge-appeal~~ before the Council.

The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification. The Council decision is also final following appeal.

The Council retains final discretion to establish the terms and length of the debarment. The length of debarment will ~~vary depending on the circumstances that led to the debarment decision~~ be for a period of at least three years; however, it may vary depending on the circumstances that led to the debarment decision. Individual circumstances may justify a longer period of debarment.

~~Person(s) or entities barred by the Council may appeal this decision to the Council in accordance with such debarment appeals procedures as the Council may establish. The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification or if the Council affirms its decision following appeal, and no additional appeal rights are available under these procedures.~~

G. ADMISSIONS REQUIREMENTS FOR PROFESSIONAL MASTER'S DEGREE PROGRAMS

Explanation of Final Changes

The Council clarified language related to the admissions requirements for professional master's degree programs which lead to certification or licensure required for employment

in the field. The Council has clarified the standard that, if a baccalaureate degree is not required for a professional master's degree by the appropriate specialized accrediting agencies and is common practice among accredited institutions, then the Council will accept such evidence as meeting the alternate admissions standards.

The effective date for this change is July 1, 2016.

3-6-601. Enrollment Prerequisites. The threshold admission requirement to a master's degree program is a baccalaureate degree.

If admission to a professional program is granted without a baccalaureate degree, the burden is on the institution to demonstrate and justify that the alternate admission requirement is accepted by a recognized licensing or specialized accrediting agency and is common practice among accredited institutions of higher education. In such cases, admission may be granted only to eligible students who have completed, at a minimum, an associate's degree or equivalent. If the institution chooses to award a suitable baccalaureate degree upon completion of specified requirements or concurrently with the award of the professional master's degree, the baccalaureate degree curriculum must be approved by the Council.

~~In instances where a baccalaureate degree is not used as the threshold for admission, the following conditions must be met: (a) admission to the program may be granted only to eligible students who have completed at a minimum an associate degree or equivalent; (b) the program must ensure that a baccalaureate degree, which meets ACICS standards, is awarded upon completion of baccalaureate degree requirements or concurrently with the award of the master's degree; and (c) the baccalaureate degree program must include in its curricular requirements sufficient and appropriate bridge to master's level courses in the field of study and must be approved by ACICS.~~

2. Proposed Criteria Revisions

At its May 2016 meeting, the Council reviewed a specific area of the ACICS *Accreditation Criteria* outlined in this Section and made substantial modifications to previously **proposed** revisions (new language is underlined, ~~deleted language is struck~~). **Public comment on these new revisions is requested through the ACICS Comment Survey explained at the end of the memorandum.**

A. PROBATION STANDARDS

Explanation of Proposed Changes

The Council proposes to clarify its current Council action procedures to note that the Council may take an appropriate action to bring a program or institution into compliance at any time. This will include the "Probation" action. Probation may be ordered when the institution has materially demonstrated that it is unable to operate within the standards of the Accreditation Criteria. The Council also proposes to clarify the timeframe by which an institution may remain on the Probation status in line with its procedures listed in Title II, Chapter 3, Introduction.

2-3-200 – Accreditation Deferred or Conditioned

The Council, upon review of relevant information concerning an institution, may take any of the following actions at any time in accordance with the procedures described.

...

2-3-210. Deferral.

...

2-3-240. Probation.

Probation is a status that the Council may impose on an institution when it determines that if the institution does not is unable to demonstrate that it consistently materially operates in accordance with the *Accreditation Criteria*.

2-3-241. Imposition. The institution will be provided in writing the areas in which the institution did not materially operate in accordance with the *Accreditation Criteria* and will be required to demonstrate corrective action for review by ACICS. ~~Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action.~~

2-3-242. Result of Probation. The Council will not accept any applications for new programs or new campuses from any institution on probation unless the institution receives approval in advance to submit such an application.

2-3-243. Probation Lifted. ~~Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show-cause directive has been vacated.~~ When the areas of noncompliance for the probation have been satisfied, the probation may be lifted by ACICS (See Title II, Chapter 3, Introduction). The Council may order a special visit at the institution's expense before lifting probation.

2-3-244. Notification of Probation. The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on probation. The institution is required to notify immediately in writing its current and prospective students that it has been placed on probation by its accrediting agency.

3. For Information Only

A. BOARD OF ETHICS

The ACICS Board of Directors applies its authority and credibility as a body of independent, ethical, and expert members in arriving at accreditation standards, procedures, and decisions. In order to further protect that independence and integrity, it has added a new factor that may trigger the resignation of a Commissioner or Director, and has strengthened the method by which it reconciles conflicts of interests or perceived breaches of integrity. The newly established Board of Ethics will consist of one standing Board member and two independent, public members, as described below:

Article IV Elections, Terms, Vacancies, Removal, Resignations, and Compensation

Section 7–Resignations. Resignation from service as a commissioner and Director may be voluntarily tendered at any time. The resignation becomes effective upon receipt of written notice by the Chair of the Board and Council or the President. Automatic tendering of resignation is required under the following circumstances or conditions:

...

(j) the commissioner is employed by an institution that is deemed to be under sustained and serious scrutiny regarding non-compliance with ACICS standards and requirements.

Article V Committees

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

...

(e) The Board of Ethics shall consist of three individuals selected by the Board consisting of two independent, public members and one member affiliated with an ACICS institution. 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.

B. INTERIM ON-SITE EVALUATIONS

The Council has strengthened its current process for conducting interim on-site evaluation visits between renewal of accreditation periods. Any time ACICS conducts an on-site visit,

the evaluation team will review an institution's overall effectiveness in key areas such as administrative capability, campus effectiveness planning, admissions and recruitment practices, recordkeeping, academics, faculty qualifications, etc. This process will be incorporated into the existing quality assurance monitoring program as well as for institutions that are determined to be at-risk as a result of student achievement indicators, financial conditions, complaints or adverse information, extensive substantive changes or enrollment growth, or other factors as determined by the Council.

The strengthened interim evaluation process began in the **Spring 2016** cycle and will continue through subsequent cycles.

C. DATA INTEGRITY REVIEW

The Council has initiated its enhanced Data Integrity Review in the **Spring 2016** cycle. Each comprehensive evaluation site visit includes an evaluator with the primary role of verifying reported institutional data, specifically included placement data reported by the institution on its most recent Campus Accountability Report.

The Council will provide further guidance regarding this review prior to its **Fall 2016** cycle.

D. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Friday, July 8, 2016**. The link to comment on these proposed changes is:
<https://www.surveymonkey.com/r/MTTF052016>.

E. ACICS AWARE WEBINAR

An AWARE webinar will be held on **Thursday, May 26, 2016 at 2:00 pm**. This webinar will focus on information presented in the May 2016 Memorandum to the Field. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar or if you have specific questions about the material presented, please send an email to Mr. Ian Harazduk at iharazduk@acics.org. ACICS is eager to respond to all questions related to this communication; therefore, if you have any questions prior to the AWARE Webinar, please send an email to Mr. Ian Harazduk at iharazduk@acics.org, so that these responses can be prepared and shared during the webinar.

F. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: The institutional ACICS ID should be used on all correspondence to and from ACICS. If you have questions about your ID code, please send an email to ebiz@acics.org.

G. 2016 WORKSHOP SCHEDULE

Renewal of Accreditation Workshop

Renewal of Accreditation Workshop	August 25, 2016	Indianapolis, IN
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Initial Accreditation Workshop

Initial Accreditation Workshop	October 4, 2016	Pasadena, CA
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Adding Value Workshop

Adding Value: Campus Effectiveness Plan	August 26, 2016	Indianapolis, IN
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H. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Schools play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you operate, please let us know about them. Send an email to Mr. Quentin Dean at qdean@acics.org and let him know the source of the information and when it appeared.

ACICS MEMORANDUM TO THE FIELD

May 20, 2016

4. Comment Survey – Proposed Criteria Revision

ACICS is collecting all comments from the field on proposed Criteria revisions through an electronic survey. Please find the survey link below:

<https://www.surveymonkey.com/r/MTTF052016>

Please respond by Friday, July 8, 2016.

If you have any questions about the memorandum to the field or the call for comment, please contact:

Mr. Ian Harazduk

Senior Manager, Policy and Compliance

Phone (202) 336-6795

iharazduk@acics.org

ACCREDITING COUNCIL
FOR INDEPENDENT COLLEGES AND SCHOOLS

OFFICIAL MINUTES OF THE MEETING OF THE COUNCIL

ACICS OFFICE
750 First Street, NE, Suite 980
Washington, D.C. 20002-4223

August 1-5, 2016

FINAL

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MEETING PARTICIPANTS

COMMISSIONERS

Dr. Lawrence Leak, *Chair*
Mr. Roger Swartzwelder, *Chair-Elect*
Dr. Edward Thomas, *Treasurer*
Mr. Richard Bennett
Ms. Julie Blake
Ms. Michelle Edwards
Mr. John D. Euliano
Dr. Fardad Fateri
Mr. Jay Fund
Dr. Adriene K. Hobdy
Dr. Deborah Jones
Mr. Luis Llerena
Dr. Ruth Shafer

STAFF

Mr. Roger Williams, Interim President
Ms. Latoya Boyd, Accreditation Coordinator
Ms. Jan Chambers, Accreditation Coordinator
Ms. Diana Concepcion, Accounts Payable Coordinator
Mr. Quentin Dean, Senior Regulatory Affairs Coordinator
Ms. Chalita Dudley, Information Management Manager
Ms. Katy Fisher, Manager, Accounting/Institutional Finance
Mr. Steven Gelfound, Vice President of Information Technology
Ms. Trina Green, Senior Accounting Manager
Mr. Ian Harazduk, Assistant Vice President, Policy and Compliance
Ms. Terrasia Harris, Accreditation Coordinator
Mr. Chad Hartman, Senior Accreditation Coordinator
Ms. Soo Ryun Kim, Jr. SharePoint Developer
Dr. Terron King, Senior Manager, Institutional and Program Review
Ms. Cathy Kouko, Accreditation Coordinator
Ms. Linda Lundberg, Accreditation Content Editor
Mr. Andre McDuffie, Senior Human Resources Coordinator
Ms. Niana Moore, Accreditation Coordinator
Ms. Katie Morrison, Accreditation Coordinator
Mr. Jeff Olszewski, Vice President of Finance
Mr. Conor O'Malley, Institutional Data Analyst I
Ms. Andrea Reid, Assistant Manager, Administration
Ms. R. Kay Ropko, Senior Systems Architect
Ms. Samantha Shellum, Program Analyst I
Ms. Shaniqua Smith, Program Analyst I
Mr. Maurice Wadlington, Senior Accreditation Coordinator
Ms. Perliter Walters-Gilliam, Associate Vice President, Quality Enhancement and Training
Ms. Karly Zeigler, New Institutions Development Lead

ACCEPTANCE OF MINUTES

I. CALL TO ORDER

Chair Larry Leak called the meeting to order at 9:05a.m. on Tuesday, August 2, 2016. He welcomed all commissioners and staff to the meeting.

Roger Williams introduced meeting observer Elise Scanlon. Ms. Scanlon advises accrediting agencies and institutions of higher education on policy, state and federal regulations.

II. APPROVAL OF MINUTES

The Council reviewed the minutes from the April 2016 Council Meeting Minutes, May 2016 Policy Meeting Minutes, and April-July 2016 Substantive Change Meeting Minutes.

MOTION: Accept the Council meeting minutes as presented.

MOVED: Euliano

SECONDED: Bennett

ACTION: Passed

OLD BUSINESS

III. REPORT FROM SPECIAL ADVISOR TO THE COUNCIL (DOE UPDATE REPORT)

Staff Williams, Harazduk and Walters-Gilliam presented the following update for the actions that have been accomplished prior to the August meeting, those that are in process, and those that are in planning.

Accomplished Items

- ACICS formally notified institutions and the public that it has put a hiatus on accepting new Initial Grant Applications
 - o 10 institutions up for review (3 institutions withdrew -Stevens-Henager, SABER, Emiraza)
 - o 30 institutions are substantially through the process and have visits scheduled for the Fall 2016 or Winter 2017 cycle
 - o 11 institutions have received notification that we are placing their application on hold until further notice
 - o 12 institutions completed a registration are being sent notification that they cannot continue at this time.
 - o 15 institutions have inquired about initial applications and have been informed that we are not accepting new applications

- ACICS completed implementation of the Data Integrity Reviewer (DIR) for the Spring 2016 cycle. The goal was for 100% attempt contact of all graduates placed on the CAR and 100% review of waivers for not available for placement.
 - o DIRs successfully contacted 2,250 graduates and/or employers (unduplicated) out of 3,482 attempts for a successful contact rate of 64% (as of 06 21 2016).
 - o Out of those 2,150 successful contacts, 2,196 confirmed placement for a confirmation rate of 97% (as of 06 21 2016).
 - o There were 23 campuses with findings of questionable data integrity in the Spring cycle (as of 06 21 2016).
 - o Following the cycle, ACICS conducted a follow-up survey with all DIRs and Chairs, which included results from 20 reviewers who gave specific requests for improvement, such as more time and/or less calls for the DIR and verifying placements ahead of time.

- ACICS implemented a "Call for Comment" survey in the Spring 2016, which received information from faculty, staff, and students prior to an on-site evaluation
 - o There were approximately 4,000 comments with approximately 3,000 from students (as of 06 21 2016)
 - o The comments were overwhelmingly positive; however, for those that raised concerns, the general themes were – course scheduling, knowledge of transferability of credit, tuition and fees not fully explained, and helpfulness of resources.

- o ACICS plans to modify the "Call for Comment" survey for the Fall2016 cycle. It will remain an open field for staff and faculty to provide comments. However, ACICS will incorporate important on-site survey questions into "Call for Comment" for Students
- ACICS conducted a webinar on July 14, 2016 with 534 attending member institutions which focused on the following questions:
 - o Where does ACICS's recognition stand with the Department and when/how might that standing change?
 - o How might institutions respond to requirements by state approval entities for accreditation contingency plans?
 - o What can institutions expect regarding the processing of applications and other requests for accreditation services?
- ACICS conducted a webinar on July 20, 2016 with 30 state oversight agencies (through coordination with NASASPS) that focused on ACICS's current recognition status and timeline and ACICS's operational procedures over the upcoming months
- At-Risk Institution Group (ARIG) commenced in April2016 and has been meeting at least monthly since that time.
 - o 41 institutions on heightened at-risk status.
 - o 8 special visits conducted in Spring 2016 with a total of 60 findings
 - o 17 special visits being scheduled for Fall2016
- The July 2016 Intermediate Review Committee (IRC) which consisted of 9 in-house reviewers and 2 remoted IRCers included an orientation on conflict of interest procedures (with signature) and the new initiatives implemented for the Spring 2016 cycle.

In Process Items

- DIR improvements for Fall2016 cycle: The process for verifying placement data for the Fall2016 cycle will change based on feedback from DIRs, Chairs, and Staff Coordinators. (Discussed in IEC).
 - o Institutions will be asked to submit the PVP spreadsheet for the months of January 2016-June 2016. ACICS' automated process will then send an e-mail and receive feedback from the graduate and/or employer verifying the placement classification. For all of those graduates that are not verified through the automated process, the DIR will then attempt contact during the on-site evaluation.
 - o The DIR will also be responsible for verifying licensure pass rates submitted to the Council
 - o A newly established DIR template is being created for the Fall2016 cycle
- ACICS will no longer recognize campuses for an Honor Roll status
- There will be a discussion in Full Council recommending removal of the Council action "Admonishment," which is typically issued when an institution must provide a response

to a minor concern. The recommendation is to replace this with a report for review by the staff.

- Member center updates with Council Actions, Adverse/Complaint Information, and Additional Information (such as expiration date, most recent renewal grant, placement and retention rates, citation history, 90/10 ratio, CDR rates, etc.) are being disseminating and utilized more widely. The information regarding each institution has been expanded and is now incorporated within ACICS database, which can be reviewed in real time by ACICS staff, IRCers, and Council members.
- 2016 and 2017 CAR Enhancements (Discussed in IEC)
 - The 2016 CAR will include new fields including a "Start Date" (Month, Year); "Schedule to Graduate Cohort" (Month/Year); and a "Transfer to new Schedule to Graduate Cohort" (Month, Year). With this information, ACICS will be able to calculate graduation rates for each program and ensure a more timely and informative correlation to placement rate results for scheduled to graduate cohorts. Then for the 2017 CAR, ACICS will be able to hold campus/programs accountable for these rates.
- The 2017 CAR will require each campus to submit a PVP spreadsheet for each month. The campus must submit the spreadsheet 30 days following the end of the month (ex. On August 31, 2016, the PVP spreadsheet for July placements is due). Through the PVP process automated e-mails will be sent to the graduate and employer. The policy will be that only if the graduate and/or employer verify the placement will the campus be able to include it as a placement. ACICS will ensure this by verifying the PVP spreadsheets with submission of the CAR and ensuring only verified placements are counted.
- Council Action Process. The actions taken by the Council will be Approval, Deferral, Compliance Warning, Probation/Show-Cause, Denial/Withdrawal (Discussion in Full Council) in an effort to streamline its processes. In addition, for the Probation/Show-Cause action, the Council will be ask to suspend the further use of hearings on show cause actions and alternatively review the institutional response through written response.
- The Team Report Improvement Committee (TRIC) has met to ensure that a more focused and substantive narrative is included within the report templates. The Fall2016 cycle will include expanded narrative answers as well as additional summary information throughout the report. In addition, the Special Visit template and the expanded QAM template is an all-narrative template.
 - Incorporate financial aid and international visa (F-1) student checklists into the review of institutions
- ACICS will improve its verification of licensure pass rates by requiring programs to upload back-up documentation for its most recent year's licensure exam pass rate.
 - In addition, ACICS has begun and will continue to provide outreach to state licensure bodies to establish communication channels in which to receive updates on program status and data on licensure rates. ACICS will then verify the rates received from the oversight body with the rate received from the institution.

- o ACICS has 39 different program types that are licensed by oversight agencies.
- ACICS has made outreach to SEVIS and received a listing of ACICS-accredited institutions that SEVIS has approved to issue student visas. ACICS plans to further outreach to determine whether any of these institutions should be determined as at-risk

In Planning Items

- Ethics Review Board. ACICS needs to complete the compilation of the board as well as establish procedures and training mechanisms for these board members.
- Special Advisory Committee. The committee has met and made proposals to the Council (which will be communicated by Roger Williams).
- Adding more "public" members to the Council
 - o Definition of public member by DOE

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

 - (1) An employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that either is accredited or preaccredited by the agency or has applied for accreditation or preaccreditation;
 - (2) A member of any trade association or membership organization related to, affiliated with, or associated with the agency; or
 - (3) A spouse, parent, child, or sibling of an individual identified in paragraph (1) or (2) of this definition.
- The at-risk factors and additional information included within the member center will be packaged for review by the ACICS staff and on-site evaluation team prior to any visit

IV. INTENT TO BAR ACTION- ANTONIO MATTIA AND SONS

Mr. Antonio Mattia did not respond to the Intent to Bar Action letter that was sent in July 2016. Marc Mattia notified the Council that he wishes to appeal the action and the Council will await his response and hear his appeal at a later date. ACICS did not receive acknowledgement that Michael Mattia or Matthew Mattia had received the intent to bar notice until July 20, 2016. ACICS will await a response from those two individuals and tack action accordingly if they do not appeal.

MOTION: Debar Antonio Mattia for 10 years
MOVED: Llerena
SECONDED: Hobdy
ACTION: Passed

V. INTENT TO BAR ACTION-DAVID ABRAMS AND ABRAMS CAPITAL

Staff Harazduk spoke with Alison Bomberg from Abrams Capital, Mr. David Abrams and Abrams Capital, LLC plans to appeal in writing. They have been provided until August 12, 2016 to submit their appeal.

MOTION:

MOVED:

SECONDED:

ACTION: No Action Taken

NEW BUSINESS

VI. PROBATION STANDARDS/COUNCIL ACTION PROCESS FC/8.16/1

The Council recently modified the Council Action Process to include specific nomenclature and definitions for out of compliance actions. The Council also determined it to be important that the procedures for probation standards be clarified, since the action had been used minimally and as a supplemental action for other out of compliance actions. However, in review of the Council action process and the proposed language for the new Probation standard, the actions appear to be somewhat duplicative.

MOTION: Vote to approve the proposed policy presented and publish in the Memorandum to the Field

MOVED: Bennett

SECONDED: Hoby

ACTION: Passed

VII. GOOD CAUSE EXTENSION TIMEFRAMES (602.20(B) FC/8.16/2

The length of the extension for good cause is currently undefined in the ACICS Accreditation Criteria; the Council has the opportunity to strengthen the standards regarding extension for good cause and clarify that such extensions are of limited duration and are available only for extraordinary circumstances.

ISSUE: Timely and decisive actions against institutions or programs operating contrary to the Council's standards effectively protects the interests of students, fulfills the agency's compliance with the requirements of the U.S. Department of Education, and fortifies the credibility and authority of ACICS. The Council has an opportunity to clarify the circumstances under which an extension for good cause will be granted an institution or program that is not in compliance with Council standards, and to limit, through policy, the duration of such an extension.

OVERVIEW:

ACICS expects institutions and programs to remain in compliance with all accreditation standards and requirements at all times. When an institution or program is found to be out of compliance, the Council has the authority to either take immediate adverse action against the school, or to require it to demonstrate compliance within a timeframe prescribed by Council, not to exceed the maximum timeframes specified in ED regulation. However, if a school cannot come into compliance within the Council's specified timeframe and the Council is provided evidence that with the granting of a limited extension, the school could achieve compliance, the Council may consider the evidence and grant a timeframe extension. The extensions are to be granted infrequently, and only for the reasons specified in the Criteria.

The length of the extension for good cause is currently undefined in the ACICS Accreditation Criteria; the Council has the opportunity to strengthen the standards regarding extension for good cause and clarify that such extensions are of limited duration and are available only for extraordinary circumstances.

CRITERIA:

The four relevant sections of the *ACICS Accreditation Criteria* regarding maximum timeframe and good cause extensions are presented below. Proposed new material is underlined; deleted material is ~~struck through~~.

2-1-808. *Financial Review.* The Council reviews the Annual Financial Report, audited financial statements, and other relevant information to monitor each institution's financial condition. When this review indicates that an institution's financial condition may be weak or deteriorating, the Council will require the institution to furnish Quarterly Financial Reports, a Financial Improvement Plan, or other complies with the Council's requirements for financial stability, the Council will issue a show-cause directive, or otherwise take negative action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in financial stability. In no event will the good cause extension exceed one year. Institutions that are required to submit interim financial reports or that are determined to be out of compliance with the Council's standards for financial stability are considered to be on financial review and are subject to additional restrictions regarding the initiation of branches and learning sites.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and Institutional Accountability Report (IAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure, registration or certification pass rates, if applicable. When this review indicates that the achievement of an institution's students is weak or deteriorating, the Council will require the institution to add an improvement plan within its Campus Effectiveness Plan (CEP) and/or Institutional Effectiveness Plan (IEP). If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a compliance warning, a show-cause directive, or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement, or licensure pass rates. In no event will the good cause extension exceed one year. Institutions that are required to include a plan of student achievement improvement within their CEPs or that are determined to be out of compliance with the Council's standards for student achievement are considered to be on student achievement review. Those with campus- or institution-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.

2-2-502. Program Compliance Warning. When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure pass rates, the institution will be provided in writing with a warning regarding the alleged deficiency. The warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established timeframe or be taught out and discontinued or otherwise conditioned.

A program compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation. The time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement or licensure pass rates. In no event will the good cause extension exceed one year.

Title II, Chapter 3, Council Actions -Introduction

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the

Council may take are described in this chapter. Procedures available to institutions to challenge those actions and the maximum time frames for achieving final disposition of those actions by the Council also are explained. There are four general areas of Council actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

If the Council determines that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to

bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed the following:

- (a) twelve months, if the longest program is less than one year in length;
- (b) eighteen months, if the longest program is at least one year, but less than two years in length; and
- (c) two years, if the longest program is at least two years in length.

The above time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in completion or placement rates. In no event will the good cause extension exceed one year.

OPTIONS

- I. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
- II. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
- III. Recommend a different approach to policy issue as stated below:
- IV. Remove from further consideration.

MOTION: Vote to approve the proposed policy presented and publish in the Memorandum to the Field
MOVED: Shafer
SECONDED: Edwards
ACTION: Passed

VIII. TEACH OUT POLICY (602.24(C)(I) FC/8.16/3

The primary mechanism for assuring the orderly and satisfactory closure of an institution are the sections of the *ACICS Accreditation Criteria* that pertain to teach-out and campus closures. The Council has the opportunity to fortify its standards regarding campus closures and clarify, through revisions to its policies and procedures, the requirements of member institutions confronting the cessation of educational operations.

MOTION: **Vote to approve the proposed policy and publish in the Memorandum to the Field**

MOVED: **Edwards**

SECONDED: **Blake**

ACTION: **Passed**

**IX. NOTIFICATION PROCEDURES TO DOE FOR TITLE IV -APPENDIX G
(602.27(A)(1)(6-7) FC/8.16/4**

Implied and expressed in the U.S. Department of Education's requirements for recognition of ACICS as a reliable authority on quality and integrity is a responsibility to exert vigilance and diligence in reviewing an institution's utilization of federal student aid funds provided through Title IV of the Higher Education Act. ACICS has an opportunity to revise and fortify its policies and procedures regarding the review of Title IV practices in response to changing expectations and external dynamics.

MOTION: **Vote to approve the proposed policy and publish it in the Memorandum to the Field**

MOVED: **Fateri**

SECONDED: **Bennett**

ACTION: **Passed**

X. ADMONISHMENTS OF PROGRAMS, INSTITUTIONS FC/8.16/5

ISSUE: The admonition or admonishment of an institution or program by the Council for an issue of performance or effectiveness that does not rise to the level of a finding worthy of a deferral or Council action creates an ambiguous category of decision that dilutes the potency of the accreditation process and undermines the Council's effective accreditation review accomplished in a timely manner.

OVERVIEW:

When a review of a program or institution by a site visit team or the Council results in a finding that may not clearly reflect performance or effectiveness that is out of compliance with Council standards, the reviewers have the option to issue an admonishment (admonition) and require subsequent evidence from the institution that it has remedied the issue. While the option to issue an admonishment instead of a finding of apparent deficiency affords the reviewers and the institution some flexibility, it also diminishes the decisiveness of the

accreditation process and unnecessarily extends the interval for achieving and demonstrating compliance.

Admonishments as an alternative to either: a) a finding of apparent deficiency worthy of a deferral or adverse Council action; or b) no finding of deficiency, are not frequently used by ACICS site reviewers or the Council. The agency's program of accreditation is most potent and defensible when it is achieving accreditation determinations that either reflects compliance or a finding of apparent deficiency requiring a school response. The gray area of "admonishment" adds complexity and ambiguity to the decision information provided to the institution; it also may have the unintended effect of extending the interval of time by which the deficiency is remedied: an admonishment may be continued pending receipt of information on an open ended basis; after the response to the admonishment is provided, the Council may decide the issue rises to the level of a finding and defer a decision pending receipt of further information; after the deferral response is received the Council may act to clear the finding, require the institution to demonstrate compliance within a maximum interval prescribed by the Council but not to exceed the maximum timeframe established under Department regulations; or the Council may take immediate adverse action. The accumulated lapse of time represented by those steps, in aggregate, may unnecessarily delay the prescription of clear accreditation requirements to the institution, and delay the effective remedy of the deficiencies. Those outcomes are contrary to the intent and purpose of the Council's accreditation program, and do not reflect decision making that is in the best interests of the student's educational experience.

CRITERIA

Sections 2-3-100,2-3-101 and Appendix B of the Criteria contain references to the admonishment option that must be amended in order to address the issues raised above.

The proposed revisions to the relevant sections of the ACICS Accreditation Criteria are provided below: New material is underlined ; material to be deleted is ~~struck through~~:

2-3-100- Accreditation Granted

If an institution is found to be in compliance with the *Accreditation Criteria*, ACICS may grant accreditation for a specific period of time from a minimum of one year to a maximum of six years. The length of the grant shall be at the discretion of ACICS. A grant of accreditation for less than six years is not a negative action and, therefore, is not appealable.

The Council will not grant accreditation for a full six-year term if the grant is awarded following any hearing resulting from a previous action to deny accreditation.

~~2-3-101. *Admonition.* The Council may judge an institution to be generally in compliance with the criteria, but it also may wish to call the institutions attention to one or more deficiencies that are not serious enough to preclude a grant of accreditation but that nonetheless must be corrected. In these cases, the institution will be awarded a grant of accreditation but will be admonished to correct the deficiencies. An admonition is an instruction to an institution either to initiate some prescribed practice or to refrain from some proscribed activity. An admonition does not condition the grant of accreditation, but failure to respond to it could result in a subsequent negative action.~~

Appendix B: Procedures and Guidelines for Unannounced Visits

Visit Procedures

The purpose of this visit is to review records, interview students and staff, and, if applicable, review previously cited problem areas and verifies responses to previous requests for information, such as complaints and adverse information received from third parties admonishments. The team may consist of a staff member, an experienced evaluator, or both. Expect the team to spend the full day at your institution.

OPTIONS

- V. Vote to approve the proposed policy and publish it in the Memorandum to the Field.
- VI. Vote to approve the proposed policy with amendments and publish it in the Memorandum to the Field:
- VII. Recommend a different approach to policy issue as stated below:
- VIII. Remove from further consideration.

MOTION: Vote to approve the proposed policy and publish in the Memorandum to the Field

MOVED: Bennett

SECONDED: Swartzwelder

ACTION: Passed

STANDING COMMITTEE REPORTS

BUSINESS PRACTICES COMMITTEE AGENDA

Tuesday, April 5, 2016

1:00PM – 3:00PM

Committee Members

Mr. Luis Llerena, Chair
Mr. Richard Bennett
Dr. Fardad Fateri
Mr. Jay Fund
Dr. Ruth Shafer
Dr. Edward Thomas

Staff Liaisons

Ms. Perliter Walters-Gilliam – Primary Liaison
Ms. Jan A. Chambers – Secondary Liaison

Others:

Ms. Anne Bennett
Mr. Cathy Kouko
Mr. Chad Hartman
Mr. Ian Harazduk
Ms. Katie Morrison
Ms. Latoya Boyd
Ms. Linda Lundberg
Ms. Niana Moore
Mr. Maurice Wadlington
Mr. Quentin Dean
Ms. Terrasia Harris
Mr. Jake Lynn (Public Relations Consultant)

I. CALL TO ORDER

Meeting called to order by Chair Llerena at 1:02 p.m.

II. OLD BUSINESS

1. AT-RISK INSTITUTION GROUP (ARIG) PROCEDURES

ISSUE

The Council has initiated a new process to gather further information about whether an institution is in compliance with Council standards in between the routine renewal of accreditation process through a review of “at-risk factors” at an institution.

OVERVIEW

Special Visits

ACICS has a number of different factors to determine whether an institution is at-risk of compliance issues. These factors include: (a) student achievement actions; (b) financial review actions; (c) adverse information; (d) complaints; (e) extensive substantive change actions; (f) enrollment growth monitoring,

(g) past performance on on-site evaluation visits, among others. ACICS monitors these actions individually as well as collectively. As part of this collective review, ACICS formalized a process for determining whether an institution is at-risk and therefore requires a Special visit. Any individual factor or a combination thereof can trigger this visit.

Key Review Areas

In each of these visit types (and anytime ACICS is on-site), the procedures would call for at least an experienced specialist and an ACICS staff member to review key issues at an institution, such as (a) campus effectiveness; (b) admissions/recruitment activities; (c) student files review (i.e. SAP); (d) faculty files (i.e. qualifications); (e) academic quality; (f) data integrity review; and possible other items that are triggered by ACICS actions.

ARIG Procedures

(See Procedural Guidelines addendum)

CRITERIA

- **2-1-808. Financial Review**
- **2-1-809. Student Achievement Review**
- **2-2-102. Effect of Extensive Substantive Change**
- **2-3-700. Complaints and Adverse Information**
- **2-1-805. Unannounced Visits**

Staff Harazduk summarized the purpose and progress of ARIG. He provided a Procedural provided an overview of special visits, key review areas, and ARIG Procedural Guidelines (Appendix A).

Commissioner Fateri questioned if the campus or ACICS would incur the cost of a special visit if ARIG determines that one is necessary. Staff Harazduk stated that the campus would incur the cost.

Discussion ensued after Commissioner Fateri asked if the Business Practices Committee (BPC) would receive a report regarding ARIG's reviews. The committee was informed by Staff Harazduk and Gilliam that staff (ARIG) will make the determination if a visit will be scheduled (that is, an investigative action, beyond reports, is needed); however, the Council will determine the appropriate action regarding the visit outcome. Commencing in December 2016, the BPC committee will receive reports on at-risk visits that were conducted between Council meetings.

MOTION AMENDED

MOTION: Continue with the at-risk institution group as currently formulated, with reports on activity provided to the Committee.
MOVED: Shafer
SECONDED: Bennett
ACTION: Passed

2. REPORT ON COMPLAINTS

Staff Gilliam summarized the complaints activity for the year so far. Commissioner Bennett questioned the average processing time, specifically if closing duplicate complaints lowered the average closing time. Staff Gilliam confirmed that this is a possibility and stated that staff would work with the IT department to see if there is a way to discount for duplicates and also delineate closed cases versus “no action” cases. It was also noted that given that a number of cases are being investigated by the At-Risk Institutions Group (ARIG) the processing time will be increased. Further, responses are also being evaluated by a third party reviewer for thoroughness and to provide additional expertise. This will impact processing time. However, those cases that do not indicate a potential violation of standards are closed relatively quickly.

Current Statistics from January - August

Average Processing Time: January 1, 2016 - August 3, 2016

Complaint 28.5855855856 days

Percentage closed and open: January 1, 2016 - August 3, 2016

Of the 178 issues opened, 111 were closed.



Source Distribution: January 1, 2016 - August 3, 2016

Student	47
Former Student	61
Faculty	9
Former Faculty	35
Parent	2
Administrator	4
Anonymous	1
Other	15
Total	174

Category Breakdown: January 1, 2016 - August 3, 2016

Equipment	4
State Regulatory Violation	19
Books or Instructional Materials	5
Career Services	4
Financial Aid	19
Admissions	11
Faculty Qualifications	19
Advertising and Catalog Discrepancies	7
Facilities	1
School Policy	12
Placement	1
Other	63
Total	165

Of the 67 open cases:

1. Waiting for school response - 5
2. Waiting additional information (from complainant) - 5
3. Under staff review – 29
 1. Initial Review - 14
 2. Response Review – 15
4. Under ARIG Consideration - 19
5. Site Visits Completed – 9

Review of Special Visit Reports

Staff Harazduk reported that three institutions discussed during the April 2016 BPC meeting (Laurus College, American College for Medical Careers, and UEI College) are currently under file review. American College for Medical Careers and the Phoenix, Arizona campus of UEI College were visited in the Spring 2016 visit cycle and Laurus College is under a compliance warning following their visit in Winter 2016.

The two campuses of Broadview University – West Jordan and Salt Lake City – were visited as a result of financial stability concerns stemming from the Financial Review Committee in April. Further, four additional institutions were subject to additional investigations, via an unannounced visit in the spring:

1. American College of Commerce and Technology
2. Brown Mackie College (Atlanta campus)
3. Northwestern Polytechnic University
4. Virginia University of Oriental Medicine

Staff Harazduk briefly summarized each visit, noting that the reports and responses are in file review for Council deliberation and action at this meeting. Prior to the discussion about UEI College, Commissioner Fateri recused himself from the conversation and left the room.

Review of Complaints by Campus Report

Staff Gilliam presented the Complaints by Campus Report (Appendix B) and shared that the number of complaints, by campus and institution, are included in ARIG's review. Commissioners Fateri and Shafer asked if there is a rubric to measure the significance of each complaint. Staff indicated that ARIG currently utilizes a rubric and beginning December 2016, staff will give BPC a comprehensive report that identifies the campus, type of complaint, and action taken by ARIG. Staff Harazduk stated that the Department of Education/Title IV is interested in the agency's complaint procedure and institutions that are determined to be at-risk will be reported to their respective states.

3. REPORT ON ADVERSE INFORMATION

Staff Dean presented the Report on Adverse Information (Appendix C) and highlighted those cases that included updates. Staff Gilliam shared that given the recent departure of Mr. Anthony Bieda, who was responsible for managing adverse information, this function will be transitioned to be part of the extensive review currently in place for complaints with changes in reporting and pursuit of investigative actions through ARIG.

Current Statistics 2016:

Open Adverse: 63 cases

Closed Adverse: 2 cases: MJI (withdrew its accreditation), Wright Career College (closed)

Because it developed over the last week, the MedTech College case is not included in the packet but was presented by Staff Gilliam and Harazduk.

The USDOE has taken the action to deny the Recertification Application to Participate in the Federal Student Financial Assistance Programs for another MedTech institution under the same ownership but different accrediting body (COE). This denial was hinged on discrepancies identified with placement data reported to COE and others. Given that this institution is under same ownership, there is concern that a similar action may be taken against the MedTech institution accredited by ACICS. ARIG has already made an assessment of the situation, having consulted with Mr. Gary Puckett at COE and executive leadership concerning taking additional investigative actions while awaiting the requested PVP records. The institution has shared with ACICS its response to the USDE and its intent to contest the

denial. Reports of this investigation will be shared with the Committee at its next meeting. Staff Dean also shared that the Financial Review Committee has also taken an action against Medtech.

Additionally, the following adverse cases in the report were highlighted:

1. American College of Commerce and Technology (ACCT)

Staff Gilliam summarized the concerns of the State Council of Higher Education of Virginia (SCHEV) which is moving ahead with a decision to revoke ACCT's license to operate in the state. The concerns are hinged on faculty qualifications, record-keeping, and overall academic quality (given the issues with faculty qualifications and students' English language skills throughout the programs). Through interactions with Ms. Sylvia Rosa-Casanova at SCHEV, it was shared that the institution has requested a hearing but the state anticipates that one will take place until some time in September (once a hearing officer takes the case) and if the hearing officer takes a full 90 days to submit his opinion, SCHEV would not render a final decision until January 2017.

Staff Morrison, who conducted the limited announced visit provided some insight on the ACICS' team concerns, which corroborated some of SCHEV's and the current recommendation from IRC to show-cause the institution. This recommendation was based on ACICS' concern with state's continued pursuit for a revocation of license and the impact. An action will be taken by the full Council this week on this case.

2. Education Management Corporation (EDMC)

The Corporation is currently on financial show cause and the hearing concluded this morning. Hence, the hearing panel will be making a recommendation to the Council this week. Consideration is being given to hosting full onsite evaluation visits in the Winter 2017, rather than the currently assigned Fall 2017, travel cycle.

3. Career Education Corporation (CEC)

Staff Dean also shared that the FRC reviewed CEC's recent disclosure to shareholders and the SEC and the subsequent action taken by the committee, which will be discussed by the full Council later this week. Staff Harazduk shared that all CEC campuses are currently being taught out and ACICS has been informed and apprised as the activities.

Commissioner Fateri asked about the consistency with at-risk visit teams, specifically regarding the interaction of the teams with the campus. Staff Gilliam assured the Committee that procedures will be put into place and training provided to the travel staff to ensure consistency in the evaluation of, and interaction with, the campuses identified for more investigation. This is necessary as more of these visits are deemed necessary.

Staff Harazduk discussed streamlining the usage of the term "adverse" to align more with the Department of Education's definition. Staff stated that the items presented in the Report on Adverse Information may not all be adverse actions but appears to be edifying information provided by various outside sources.

Additional discussion ensued regarding the Committee's involvement in the actions taken on complaints and adverse. Staff Harazduk discussed BPC recommending action based upon visits from the previous visit cycle and committee will review and make recommendations regarding the at-risk visit files.

4. RECRUITMENT ACTIVITIES REVIEW

ISSUE

ACICS' has strengthened its quality assurance and quality enhancement activities related to recruitment activities on an ongoing basis following substantial scrutiny of recruiting practices stating that ACICS-institutions have been engaged in misleading or misrepresentation activities by the Department of Education staff report, state attorneys general, federal agencies, and other external sources.

OVERVIEW

At the May Council meeting, the Council finalized a new policy, which placed the burden of recruitment oversight on the institution. ACICS will then review and determine whether the oversight practices in place for recruitment practices are occurring and are appropriate. The following discusses ongoing procedural enhancements following the policy change.

ACICS plans to publish its guidelines related to recruitment practices (which have been collected from the *Criteria* standards):

- All prospective students are presented with current and accurate information regarding courses and programs, services, tuition, terms, and operation policies (Section 3-1-412(a))
- Reliable information about the performance of the institution, including student achievement, is made available to prospective students (Section 3-1-704)
- The transfer of credit policy, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution, is made available to prospective students (Section 3-1-413)
- The institution shall not recruit prospective students through means that are unethical or subject to public criticism (Section 3-1-410)
- The institution shall not knowingly admit ill-prepared applicants (Section 3-1-410)
- The institution shall not offer monetary incentives to prospective students to visit, enroll in, attend, or complete a program (Appendix C, Advertising #6)
- The institution shall not present material that leaves false, misleading, or exaggerated impressions with respect to the institution, its personnel, its courses or services, or the occupational opportunities for graduates (Appendix C, Advertising)
- The institution shall not make guarantee or similar claims regarding job placement or salary for graduates (Appendix C, Advertising #6)
- The institution shall not disclose inaccurate or misleading information about the institution's accreditation status or an accreditation action given to the institution (Section 3-1-703)

Prior to establishing this policy, ACICS surveyed a few institutions regarding their admissions and recruitment practices. ACICS has now expanded that survey and has results (handout) about the variety of measures in which institutions oversee their recruiting personnel, which will help in crafting a best practices document on recruitment practices.

ACICS has also reviewed the survey data and determined that the following approaches would be necessary to determine whether the institution has an effective oversight program for its recruiting personnel:

- Reviewing the documented recruitment oversight policy
- Reviewing documented activities of oversight practices
 - i. Admission representative reviews
 - ii. Admissions training meeting minutes and materials
 - iii. Review standardized recruitment materials (Power points, videos, documents, etc.)
 - iv. Student surveys following admissions process, and/or
 - v. Listening to recorded calls, shops
- Targeted interview questions to admission directors, representatives, students
- Observation of admissions process
- Additional questions to the ACICS student survey related to recruiting practices

The Council also needs to consider in which instances it would be appropriate for further oversight of recruiting practices occur. If concerns are raised about the recruiting practices of an institution whether through, adverse, complaints, or an ACICS review, then a heightened review including secret shoppers will need to be instituted.

CRITERIA

Section 3-1-412(a): An institution shall ensure that any person or entity engaged in admissions or recruitment activities on its behalf is communicating current and accurate information regarding courses and programs, student achievement disclosures (See Section 3-1-704), services, tuition, terms, and operating policies. The institution must maintain documentation that demonstrates that it systematically monitors its recruitment activities.

Staff Harazduk presented a case for a need to strengthen ACICS’ quality assurance and quality enhancement activities related to recruitment activities on an ongoing basis. There has been substantial scrutiny of recruiting practices stating that ACICS-institutions have been engaged in misleading or misrepresentation activities by state attorneys general, federal agencies, and other external sources.

Discussion ensued regarding the development of a policy that requires any institutions which utilize secret shoppers to submit the shopper’s results to the agency, during or independent of an evaluation visit. Commissioner Fateri suggested that teams listen in on live and/or recorded calls while on-site. The committee discussed the utilization of phone shops by third party vendors and the cost of phone and in-person shops.

The use of a third-party secret shopping agency will be determined by risk (complaints, adverse information, USDE or state reports, etc.) and employed to conduct an independent review of recruitment activities. The number of shops conducted will also be determined based on the level fo risk, size and scope of the institutions, etc. Staff Walters-Gilliam suggested that staff develop and pilot various procedures in the Fall 2016 cycle and will report the findings in the December 2016 Council meeting. However, information about the use of independent, third-party secret shoppers will be sent out in the next Memorandum to the Field so that institutions are informed about this additional tool being used to evaluate the recruitment activities.

- MOTION: Accept the proposed procedural changes, including the use of an independent Secret Shopping firm, for publication in the Memorandum to the Field.
- MOVED: Shafer
- SECONDED: Fund
- ACTION: Passed

III. NEW BUSINESS

NONE

IV.

ADJO

URMEMT

MOTION: Adjourn the Meeting at 3:21 p.m. EST.

MOVED: Fateri

SECONDED: Bennett

ACTION: Adjourned

APPENDICES

Appendix A

“At-Risk” Institution Group (ARIG) Procedural Guidelines

Group:

The group consists of the following ACICS staff members and their specific role:

- Chair/Visits – Ian Harazduk, Associate Vice President
- Complaints and Adverse – Jan Shelton, Senior Accreditation Coordinator and/or Perliter Walter-Gilliam, Associate Vice President
- Student Achievement Review/Enrollment Growth – Terron King, Senior Manager, Institutional and Program Review
- Financial Review and Adverse – Katy Fisher, Manager, Accounting/Institutional Finance

Purpose:

The expressed purpose of ARIG is to review the interim information/actions received for institutions and determine the investigatory action that will take place. The goal is to provide the Council with the necessary information by which to make an informed decision about a campus or institution.

Scope of Review:

The items for which the group compiles information is for complaints, adverse information, student achievement review, finance review, enrollment growth monitoring, and the most recent comprehensive visit. The ARIG report lists all ACICS-accredited institutions and compiles all of the actions/information as well as the retention and placement rates of the campus and the cohort default rates of the institution. The report allows the group to see each action against each campus and institution (a main and its branch campuses).

Meeting:

The group will meet following each Council meeting, since new actions will have been taken against institutions at that meeting. The group will also meet on an as needed basis (likely at least once a month) as new information is received (particularly related to complaints and adverse information).

Process:

The group members have been assigned because of their experience and daily responsibilities of handling one of the interim review items. Each group member discusses each case within their purview and based on the other actions and information on the report and about the case, the committee determines the appropriate investigatory action. The group is not authorized to take any specific non-compliant actions against an institution (only the Council, the decision-makers, can take actions against an institution).

Each at-risk factor has its own mechanism for determining severity (Complaints and Adverse = 1-5 rating; Financial = FRC matrix; SAR = Due Process Table; Extensive Substantive Change = ESC Rubric; Enrollment Growth = Y/N for Monitoring). The group will determine on a case-by-case basis

dependent on the type and severity of a particular at-risk factor as well as the multiplicity of factors which investigatory action is necessary.

Investigatory Actions:

The group has a variety of investigatory actions to which it can review an “at-risk” institution:

- Handle the case through the specific interim review process by which it arose (i.e. the complaint process, adverse process, etc.).
- Heighten its monitoring by requiring by a response to all concerns raised. This individual response will be reviewed at the Council level
- Direct a special visit to the institution to review the overall effectiveness of the campus/institution and a focused review of the specific issues of the case. This review can be announced or unannounced.

Each of these investigatory actions is not mutually exclusive. The group may require the institution to provide a response and then upon review of that response, direct a heightened response or special visit.

Disposal of Case:

Each action/information will remain on the report until the case is effectively closed. All investigatory findings and reports will be reviewed per the Council File Review process and an action in line with the Council Action Process (i.e. compliance warning, show-cause, withdrawal by suspension, etc.) will be issued to the campus/institution similar to the application review process.

Appendix B

Business Practices Committee August 2016

Complaints by Campus Report

Name	City	State	Count
Career Point College - Spencer Lane Branch	San Antonio	TX	11
Bristol University	Anaheim	CA	7
Laurus College	San Luis Obispo	CA	7
West Virginia Business College	Nutter Fort	WV	6
American College For Medical Careers	Orlando	FL	6
Radians College	Washington	DC	6
Unidentified Institution	Various		5
Instituto de Banca y Comercio	Hato Rey	PR	5
Hondros College	Westerville	OH	5
Virginia College	Birmingham	AL	5
MDT College of Health Sciences, Inc.	Highland Heights	OH	5
ITT Technical Institute	Corona	CA	5
Westwood College-Denver North	Denver	CO	5
Virginia College	Huntsville	AL	4
Fortis Institute	Erie	PA	4
Ambria College of Nursing	Hoffman Estates	IL	4
Art Institute of New York City	New York	NY	4
Computer Systems Institute	Chicago	IL	4
Living Arts College @ School of Communication Arts	Raleigh	NC	4
Southern States University	San Diego	CA	4
PITC Institute	Wyncote	PA	4
Brightwood College	Houston	TX	3
Daymar College	Nashville	TN	3
Stone Academy	West Haven	CT	3
American Institute	West Hartford	CT	3
Harrison College	Indianapolis	IN	3
City College	Fort Lauderdale	FL	3
Taylor Business Institute	Chicago	IL	3
Elmira Business Institute	Elmira	NY	3
Florida Career College - Miami	Miami	FL	3
Everest University - Tampa	Tampa	FL	3
Lincoln Technical Institute	Paramus	NJ	3
City College	Altamonte Springs	FL	3
Fortis College	Orange Park	FL	3
ITT Technical Institute	Lathrop	CA	3
ITT Technical Institute	Liverpool	NY	3
ITT Technical Institute	Troy	MI	3

Brightwood College
 Stratford University
Name
 Brown Mackie College - Atlanta
 Medtech College
 Virginia College
 Jose Maria Vargas University
 American Institute
 UEI College
 ITT Technical Institute
 Brown Mackie College - Boise
 ITT Technical Institute
 Broadview University-West Jordan
 Miller-Motte Technical College
 Mildred Elley-New York City
 Global Health College
 Dewey University- Hato Rey Campus
 Everest University - Brandon
 MBTI Business Training Institute
 Bryan University
 MDT College of Health Sciences, Inc., dba ATS Institute of
 Technology
 EDIC College
 Lincoln University
 Miller-Motte College
 Miami-Jacobs Career College
 Miller-Motte Technical College
 Texas Health and Science University
 Eastwick College
 Fortis College
 Branford Hall Career Institute
 Florida Technical College
 Empire College
 Everest University - North Orlando
 Santa Barbara Business College
 Fortis College
 Charter College
 Career Point College
 American University In Bosnia and Herzegovina
 Miller-Motte Technical College
 Everest University - Pinellas
 Sanford-Brown College-Chicago
 ITT Technical Institute
 Florida Technical College
 Everest College
 Everest College

McAllen	TX	3
Falls Church	VA	3
City	State	Count
Atlanta	GA	3
Indianapolis	IN	3
Lubbock	TX	3
Pembroke Pines	FL	3
Clifton	NJ	3
Phoenix	AZ	3
Phoenix	AZ	3
Boise	ID	3
Huntington	WV	3
West Jordan	UT	3
Columbus	GA	3
New York	NY	3
Alexandria	VA	3
Hato Rey	PR	2
Tampa	FL	2
Santurce	PR	2
Topeka	KS	2
Chicago	IL	2
Caguas	PR	2
Oakland	CA	2
Wilmington	NC	2
Dayton	OH	2
Lynchburg	VA	2
Austin	TX	2
Ramsey	NJ	2
Ravenna	OH	2
Branford	CT	2
Lakeland	FL	2
Santa Rosa	CA	2
Orlando	FL	2
Bakersfield	CA	2
Norfolk	VA	2
Anchorage	AK	2
San Antonio	TX	2
Tuzla		2
Clarksville	TN	2
Largo	FL	2
Chicago	IL	2
Youngstown	OH	2
Orlando	FL	2
Newport News	VA	2
Henderson	NV	2

Name	City	State	Count
Stautzenberger College	Maumee	OH	2
Pioneer Pacific College	Wilsonville	OR	2
Charter College-Lynnwood	Lynnwood	WA	2
Northwestern Polytechnic University	Fremont	CA	2
ITT Technical Institute	Richmond	VA	2
ITT Technical Institute	St. Rose	LA	2
Brightwood Career Institute	Philadelphia	PA	2
Everest University - Jacksonville	Jacksonville	FL	2
Sanford-Brown College	Orlando	FL	2
Long Island Business Institute	Flushing	NY	2
Silicon Valley University	San Jose	CA	2
ITT Technical Institute	Springfield	VA	2
Virginia College	Pensacola	FL	2
West Virginia Junior College	Bridgeport	WV	2
Miami-Jacobs Career College	Sharonville	OH	2
ITT Technical Institute	Chantilly	VA	2
American University of Health Sciences	Signal Hill	CA	2
California International Business University	San Diego	CA	2
Digital Media Arts College	Boca Raton	FL	2
ITT Technical Institute	Swartz Creek	MI	2
ITT Technical Institute	Maumee	OH	2
ITT Technical Institute	Tampa	FL	2
California University of Management and Sciences San Diego Branch	San Diego	CA	2
Brown Mackie College - Indianapolis	Indianapolis	IN	2
Santa Barbara Business College	Rancho Mirage	CA	2
Miller-Motte College	Raleigh	NC	2
Sentara College of Health Sciences	Chesapeake	VA	2
Southern Technical College	Port Charlotte	FL	2
Redstone College	Broomfield	CO	2
Florida Career College - Boynton Beach	Boynton Beach	FL	2
Miller-Motte College	Jacksonville	NC	2
Laurus College	Oxnard	CA	2
Florida Career College - Kendall, Florida	Miami	FL	2
Florida Technical College	Pembroke Pines	FL	2
Beckfield College	Florence	KY	1
Everest University - Pompano Beach	Pompano Beach	FL	1
American National University	Louisville	KY	1
Jones College	Jacksonville	FL	1
Daymar College	Owensboro	KY	1
Penn Commercial Business/Technical School	Washington	PA	1
West Virginia Business College	Wheeling	WV	1
American Educational College	Bayamon	PR	1
Spencerian College	Louisville	KY	1
Trumbull Business College	Warren	OH	1

Name	City	State	Count
Harris School of Business	Cherry Hill	NJ	1
Delta School of Business & Technology	Lake Charles	LA	1
Brookline College	Tempe	AZ	1
Detroit Business Institute-Downriver	Riverview	MI	1
Southern Technical College	Fort Myers	FL	1
Ohio Business College	Sheffield Village	OH	1
Lansdale School of Business	North Wales	PA	1
Bryan University	Springfield	MO	1
Cambria-Rowe Business College	Johnstown	PA	1
The Art Institutes International Minnesota	Minneapolis	MN	1
Key College	Dania Beach	FL	1
Mildred Elley	Pittsfield	MA	1
College of Court Reporting	Hobart	IN	1
Instituto de Banca y Comercio	Manati	PR	1
McCann School of Business & Technology	Hazle Township	PA	1
Lincoln Technical Institute	Edison	NJ	1
City College	Gainesville	FL	1
Brookline College	Phoenix	AZ	1
Gallipolis Career College	Gallipolis	OH	1
Bryan University	Los Angeles	CA	1
Fortis College	Richmond	VA	1
Ohio Valley College of Technology	East Liverpool	OH	1
Sanford-Brown College	Tampa	FL	1
American National University	Danville	VA	1
McCann School of Business & Technology	Pottsville	PA	1
Beal College	Bangor	ME	1
Mountain State College	Parkersburg	WV	1
Forrest College	Anderson	SC	1
Brightwood Career Institute	Pittsburgh	PA	1
Brightwood College	Sacramento	CA	1
Sage College	Moreno Valley	CA	1
New York Institute of English and Business	New York	NY	1
Professional Business College	New York	NY	1
Ridley-Lowell Business & Technical Institute	Binghamton	NY	1
Berks Technical Institute	Wyomissing	PA	1
Tucson College	Tucson	AZ	1
IBMC College	Fort Collins	CO	1
Professional Golfers Career College	Temecula	CA	1
Lincoln Technical Institute	Brockton	MA	1
Hondros College	Fairborn	OH	1
Stratford University	Newport News	VA	1
Virginia College	Florence	SC	1
Ohio Medical Career College	Dayton	OH	1
Everest College	Woodbridge	VA	1
Name	City	State	Count

Florida Technical College	Deland	FL	1
Branford Hall Career Institute	Southington	CT	1
Sanford-Brown College	Jacksonville	FL	1
Sullivan College of Technology and Design	Louisville	KY	1
ITT Technical Institute	Albany	NY	1
ITT Technical Institute	Indianapolis	IN	1
ITT Technical Institute	Harrisburg	PA	1
ITT Technical Institute	Hialeah	FL	1
ITT Technical Institute	Everett	WA	1
ITT Technical Institute	Richardson	TX	1
ITT Technical Institute	San Antonio	TX	1
ITT Technical Institute	San Bernardino	CA	1
ITT Technical Institute	Spokane Valley	WA	1
ITT Technical Institute	Strongsville	OH	1
ITT Technical Institute	Fort Wayne	IN	1
ITT Technical Institute	Westminster	CO	1
ITT Technical Institute	Torrance	CA	1
ITT Technical Institute	Tucson	AZ	1
ITT Technical Institute	Greenfield	WI	1
ITT Technical Institute	Henderson	NV	1
The Art Institute of Phoenix	Phoenix	AZ	1
Art Institute of Fort Lauderdale	Fort Lauderdale	FL	1
Brightwood College	Beaumont	TX	1
Brightwood College	Chula Vista	CA	1
Brightwood College	San Diego	CA	1
Branford Hall Career Institute	Amityville	NY	1
ITT Technical Institute	Wilmington	MA	1
Le Cordon Bleu College of Culinary Arts	Pasadena	CA	1
Miller-Motte Technical College	Charleston	SC	1
Lincoln Technical Institute	Philadelphia	PA	1
Lincoln Technical Institute	Philadelphia	PA	1
Brooks Institute	Ventura	CA	1
Virginia College	Mobile	AL	1
Le Cordon Bleu College of Culinary Arts	Orlando	FL	1
McCann School of Business & Technology	Dickson City	PA	1
Brookline College	Albuquerque	NM	1
Court Reporting Institute of St. Louis	Clayton	MO	1
Miller-Motte Technical College	Chattanooga	TN	1
Everest College	Dallas	TX	1
National College	Knoxville	TN	1
Southern Technical College	Orlando	FL	1
Sanford-Brown College	Atlanta	GA	1
Sanford-Brown College	Fort Lauderdale	FL	1
Sanford-Brown College	Houston	TX	1
Name	City	State	Count
Everest University - Orange Park	Orange Park	FL	1

American National University	Kettering	OH	1
California University of Management and Sciences	Anaheim	CA	1
Le Cordon Bleu College of Culinary Arts	Austin	TX	1
Miller-Motte College	Cary	NC	1
American National University	Indianapolis	IN	1
IBMC College	Cheyenne	WY	1
Daymar College	Bellevue	KY	1
	Warrensville		
ITT Technical Institute	Heights	OH	1
Virginia College	Biloxi	MS	1
Miami-Jacobs Career College	Springboro	OH	1
Sanford-Brown College	San Antonio	TX	1
Computer Systems Institute	Skokie	IL	1
College of Business & Technology	Miami	FL	1
ITT Technical Institute	Oklahoma City	OK	1
ITT Technical Institute	Lexington	KY	1
Pinchot University	Seattle	WA	1
East West College of Natural Medicine	Sarasota	FL	1
National College	Memphis	TN	1
Virginia International University	Fairfax	VA	1
Miami-Jacobs Career College	Troy	OH	1
ITT Technical Institute	South Bend	IN	1
Fortis College	Landover	MD	1
National College	Bartlett	TN	1
Medtech College	Greenwood	IN	1
Virginia College	Montgomery	AL	1
Southern Technical College - Auburndale	Auburndale	FL	1
ITT Technical Institute	High Point	NC	1
ITT Technical Institute	Madison	AL	1
Bergin University of Canine Studies	Rohnert Park	CA	1
Virginia College	Greenville	SC	1
Globe University - Sioux Falls	Sioux Falls	SD	1
ITT Technical Institute	Concord	CA	1
Brown Mackie College - Tulsa	Tulsa	OK	1
Texas Health and Science University- San Antonio Campus			
Addition	San Antonio	TX	1
Southern Technical College - Mount Dora	Mount Dora	FL	1
SOLEX College	Wheeling	IL	1
International College of Health Sciences	Boynton Beach	FL	1
Minnesota School of Business - Elk River	Elk River	MN	1
Hondros College	West Chester	OH	1
Florida Technical College	Cutler Bay	FL	1
Southern California Health Institute (SOCHI)	Los Angeles	CA	1
Name	City	State	Count
Broadview University-Orem	Orem	UT	1
Tribeca Flashpoint College	Chicago	IL	1

American National University	Willoughby Hills	OH	1
Miller-Motte College	Fayetteville	NC	1
Brown Mackie College - St. Louis	Fenton	MO	1
PC AGE Career Institute	Jersey City	NJ	1
SAE Institute Atlanta	Atlanta	GA	1
SAE Institute of Technology	North Miami Beach	FL	1
The Art Institute of York - Pennsylvania	York	PA	1
Salter School of Nursing & Allied Health	Manchester	NH	1
Instituto de Banca y Comercio	Bayamon	PR	1
Miller-Motte Technical College	Conway	SC	1
Le Cordon Bleu College of Culinary Arts	Portland	OR	1
Stratford University - Glen Allen	Glen Allen	VA	1
Missouri College	Brentwood	MO	1
Miller-Motte Technical College	Augusta	GA	1
Pinnacle Career Institute	Kansas City	MO	1
Virginia College	Spartanburg	SC	1
Miller-Motte Technical College	Roanoke	VA	1
Virginia University of Oriental Medicine	Fairfax	VA	1
Le Cordon Bleu College of Culinary Arts	San Francisco	CA	1
Le Cordon Bleu College of Culinary Arts Scottsdale	Scottsdale	AZ	1
American College of Commerce and Technology	Falls Church	VA	1
Iglobal University	Annandale	VA	1
Bay Area Medical Academy	San Francisco	CA	1
Unilatina International College	Miramar	FL	1
Columbia College	Fairfax	VA	1
ITT Technical Institute	Philadelphia	PA	1
Pittsburgh Career Institute	Pittsburgh	PA	1

Appendix C

ACICS Council Meeting – August 2016 Business Practices Committee – Adverse Report

Current Statistics 2016:

Open Adverse: 63 cases

Closed Adverse: 2 cases: MJI, Wright Career College

The Council currently tracks 63 open cases, compared to 59 cases in August 2015 and 32 in April 2014 (chart 1).

As of May 2016, the tracking and analysis of adverse information regarding ACICS accredited colleges and schools has been augmented by the establishment and implementation of an At-Risk Institutions Group (ARIG). All subsequent new adverse cases, as well as open adverse cases, will be processed through ARIG for consideration by the Council.

Adverse Characteristics

Inquiries about ACICS colleges and schools by the Office of the Undersecretary (OUS), the FSA division of the Department of Education, Capitol Hill, DC based think tanks and the news media have persisted through the second quarter of 2016. The nature of new adverse inquiries continue to focus on the recruitment and admissions, student achievement data integrity, and the financial stability of institutions (chart 3).

Chart 1. Number of open adverse Apr. 2011-2016:

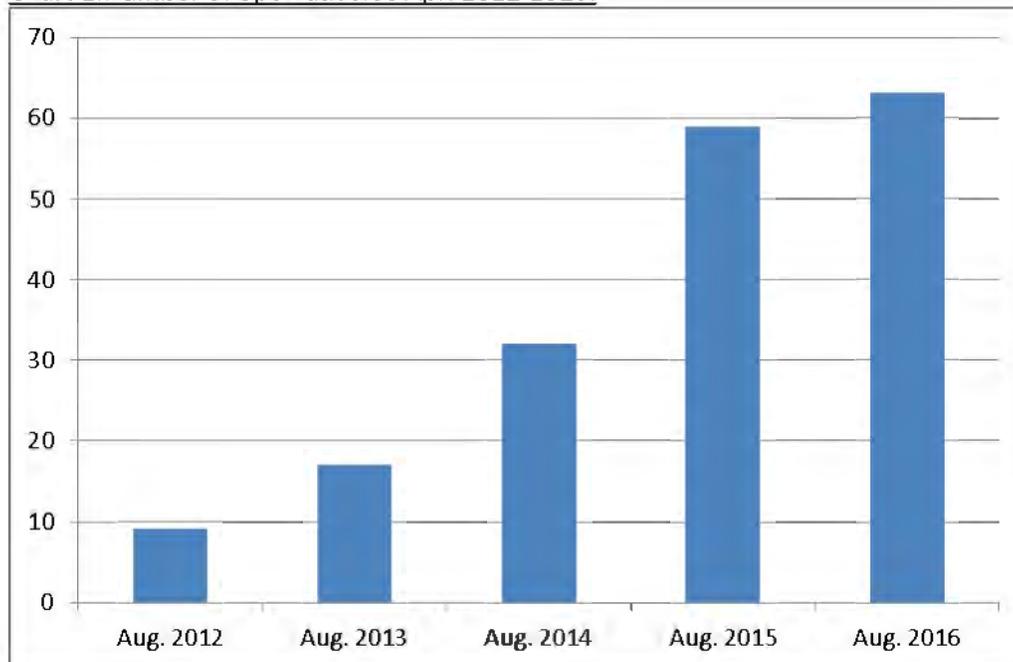


Chart 2. Source of Current, Open Adverse:

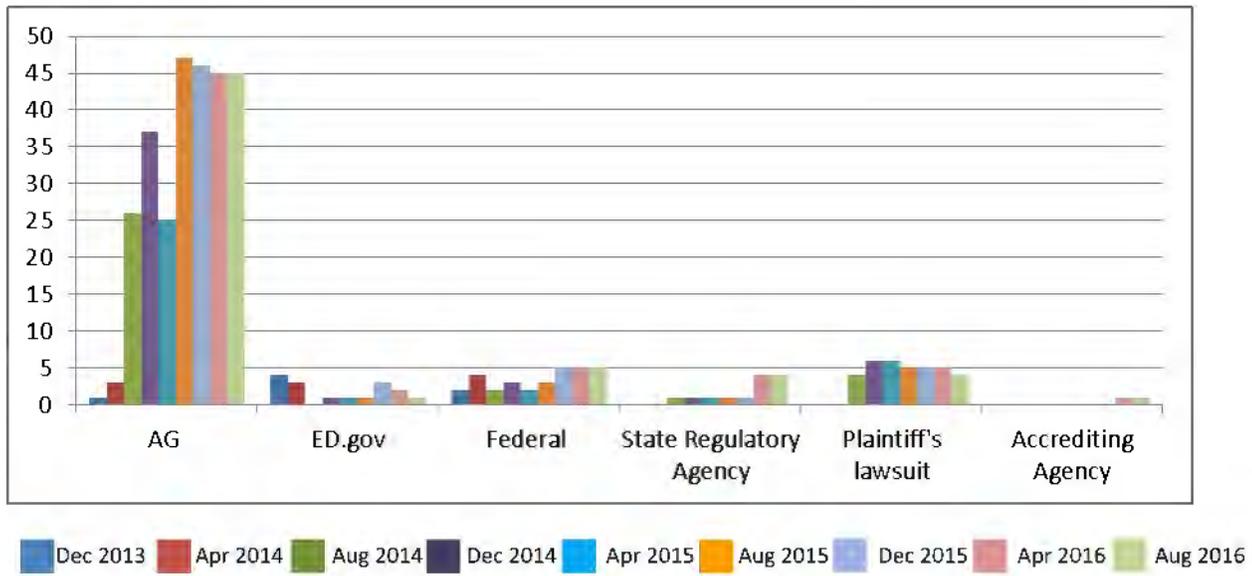
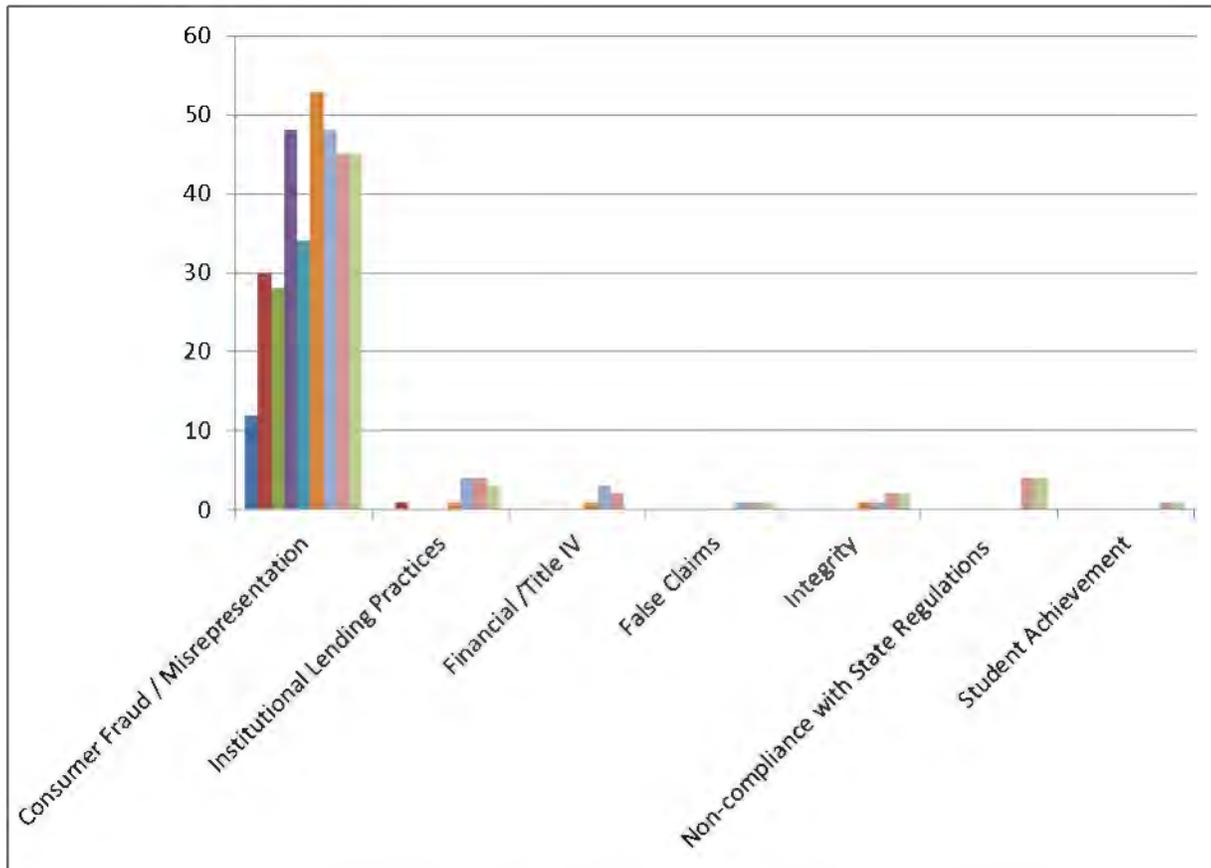


Chart 3. Categories of Current, Open Adverse:



American College of Commerce and Technology (ACCT)

School Name: ACCT

Location: Fall Church, VA

Summary of Issues:

ACCT has been found deficient in its compliance with a number of Virginia State post-secondary education requirements and regulations, based on a site audit earlier this year. The 13 deficiencies include those regarding instructor qualifications, admissions policy, student records maintenance, program quality, on-line programs, fidelity to refund policy and other matters. In addition, the State Council for Higher Education for Virginia (SCHEV) has cited ACCT for two items of concern: 1) The institution may be in violation of federal law regarding its practices for admitting F-1 Visa international students; 2) the Institution has ties to an institution ordered closed by SCHEV (University of Northern Virginia). The organization has been afforded the opportunity by SCHEV to respond to and address the findings in writing.

April 2016 Status:

American College of Commerce and Technology is preparing a comprehensive response to the SCHEV notice and will appear before the agency in April month to participate in a fact finding conference. ACCT will a copy to ACICS for review. ACCT indicates that it intends to “confirm that the institution remains worthy of continued licensure” in Virginia; that many of the observations are based on misunderstandings of institutional policies, federal requirements, and SCHEV standards. ACCT also acknowledged that “some of the observations were caused by certain filing systems at the institution and certain de-centralized recordkeeping processes that contributed to the misunderstandings. ACCT also notes that there is always an opportunity to improve operational activities and therefore the response will describe policies, procedures and practices that were created in response to this report to ensure similar observations will not occur in the future.”

ACCT provided a teach-out plan as requested in the notice of adverse information.

August 2016 Status:

Resolution of this adverse is being processed by the At-Risk Institution Group (ARIG).

Brown Mackie Colleges, EDMC – Arizona Board of Nursing

School Name: Brown Mackie College

Location: Tucson and Phoenix, AZ

Summary of Issues:

The nursing education programs at EDMC's Brown Mackie Colleges in Arizona are under escalated scrutiny and sanctions by the Arizona State Board of Nursing (ABON). Information about the adverse actions taken by ABON came to the attention of ACICS through the news media.

Specifically the institution's Practical Nursing Program at its Tucson campus is subject to a consent agreement for violating the Nurse Practices Act. The agreement requires Brown Mackie Tucson to cease enrolling new nursing students; and to teach-out members of three nursing cohorts. The institution's approval to offer nursing education in Arizona terminates upon the graduation of the last student.

The Consent Agreement demonstrates that Brown Mackie College – Tucson no longer complies with ACICS Accreditation Criteria, Section 1-2-100, Minimum Eligibility: "An institution or entity must satisfy the following: (f) It shall be in compliance with all applicable laws and regulations."

In August ACICS required Brown Mackie to respond and disclose remedies for each of eight deficiencies listed in the Consent Agreement.

December 2015 Status:

Brown Mackie Tucson provided written materials defending its compliance with ACICS standards in August. The materials were reviewed by a nursing specialist evaluator who provided findings and recommendations. Based on those findings, and subsequent information regarding issues with the Phoenix campus of Brown Mackie (nursing education program) derived from documented reviews by ABON, ACICS conducted special visits to both campuses' nursing programs in October. The report on the findings of the nursing evaluator has not been completed; once it is completed, Brown Mackie will be afforded an opportunity to respond; the evaluator report and the institutions response subsequently will be provided for Council review.

April 2016 Status:

As a follow-up to the email sent on November 9, 2015 (see below) Brown Mackie College – Phoenix has mutually agreed to sign a Consent Agreement with Arizona State Board for Private Post-Secondary Education and pay a civil penalty of \$1000. This was following the action by the Arizona State Board of Nursing and the consent agreement signed on November 6, 2015. The agreement stipulates that it is entered into to resolve disputed claims and that nothing in it should be considered an admission of fault or wrongdoing, and that the agreement is intended to "promptly and judiciously resolve" the matter, consistent with the public interest and statutory requirements. Consent order includes \$1,000 civil penalty. No other information available at this time.

August 2016 Status:

EDMC will have the opportunity to address this adverse during its show-cause hearing on Wednesday, Aug. 3, 2016.

California University of Management and Sciences – Former Staff Lawsuit

School Name: California University of Management and Sciences

Location: Anaheim, CA

Summary of Issues:

A former employee of the institution filed a lawsuit in September alleging that students' grades have been altered inappropriately and that the institution has been acting as a diploma mill. The allegations came to the attention of ACICS through online media, and the institution was asked to respond.

December 2014 status:

The institution conducted an internal review through an administrative committee of the allegations regarding student grade modifications and activities related to the “diploma mill” allegation. As a result of the review, an employee was terminated who subsequently filed a lawsuit against the institution. No other update is available at this time.

April 2015 status:

The institution moved to dismiss the first amended version of the complaint. On March 9, the Court sustained the institutions motion and directed plaintiff to amend his complaint and to properly allege these claims. Plaintiff must file his second amended complaint by April 8. Trial has been set in this matter for September 14.

August 2015 status:

Litigation against the institution, CalUMS, and the founder/president/Chair of the Board, Dr. David Park, has been bifurcated. In June, attorneys for Dr. Park (as an individual party to the lawsuit) were successful in asking the court to dismiss Dr. Park from the litigation, including a second amended complaint filed in April. There are no more claims against Dr. Park; however the plaintiffs have appealed the ruling.

CalUMS has filed motions to 1) dismiss the case or 2) deliver a summary judgment/ adjudication; the motions are set for hearing on August 17. A trial date has been set for September, but may be continued until January 2016.

December 2015 status:

The appeal by the plaintiffs of the Court ruling dismissing all claims against Dr. Park is still pending before the California Court of Appeals. The Case against CalUMS has been stayed until resolution of the

appeal; a trial date has been set for March 2016 but may be continued pending the outcome of the appeal of the ruling dismissing all claims against Dr. Park.

April 2016 Status:

The Plaintiff in the case has continued an appeal of the previous judgement which was entered in favor of Dr. David Park. A new trial date has been set for August 2016, pending resolution of the appeal.

August 2016 Status:

This adverse has been referred to the ARIG group.

Career Education Corporation
ACCSC / NY & FL Offices of Attorneys General / USDOE

Name: Career Education Corporation

Location: Various

Summary of Issues: While submitting documents for a subpoena issued by the New York Attorney General's office, Career Education Corporation (CEC) reported findings of improper

placement practices at some of its campuses. They launched an internal investigation to try and discover how the practices affected their reported placement rates. Meanwhile, state investigations were also initiated in Florida and Illinois. All of the State Attorney General activity is based on verification that the schools have not violated various consumer protection laws in the state. The states have subpoenaed documents relating to marketing, advertising, recruitment, placement and student outcomes.

The state initiated investigations led to an inquiry from the Chicago/ Denver School Participation Team of the USDOE, requesting copies of all subpoenaed documents and all adverse information responses.

ACICS was notified that ACCSC opened adverse against their CEC schools and asked for a response to the issues. Subsequently, ten campuses of CEC were show-caused by ACCSC, citing the integrity of their placement practices and employment data.

April 2013 status: CEC continues to provide monthly updates to the School Participation Team, but there has been no update as to when the review will be completed. There has been little to no movement on the state-initiated investigations. None of the states have requested any follow-up information, nor have they alleged any wrongdoing. However, CEC has received notice that the

Attorney General's Office of the state of Massachusetts has opened an investigation into CEC-owned schools in that state, citing the same issues as the others.

CEC submitted a response to the Show-Cause order from ACCSC; this information was reviewed at the Commission's November meeting; CEC is awaiting the results of that review. The show-cause order now encompasses only nine campuses as Le Cordon Bleu Institute of Culinary Arts, Pittsburgh, PA has closed.

August 2013 status: Regarding the inquiry from the school participation team, CEC has continued to provide monthly updates as requested, and the review is ongoing. Regarding the state investigations, CEC has disclosed in its May 6th 10Q report with the Securities and Exchange Commission (SEC) that it has shared the results of its internal investigation of placement rate issues with the New York Attorney General's office. The inquiry remains unresolved. Likewise, CEC disclosed that it continues to cooperate with the inquiry from the Florida Attorney General's office and the Illinois Attorney General's office. Finally, the show-cause order against ten CEC campuses by ACCSC was lifted on December 5th 2012, and reported to ACICS in March, 2013.

December 2013 status: CEC publicly disclosed at the end of August a final agreement with the Attorney General of the State of New York. The two remaining matters, pertaining to the Florida Attorney General's office and the Illinois Attorney General's office, remain open. CEC offers no update except that they continue to cooperate and respond to requests for information as they are received. SEC disclosure by CEC on these issues is as follows:

The Company received from the Attorney General of the State of New York ("NYAG") a Subpoena Duces Tecum dated May 17, 2011 (the "Subpoena"), relating to the NYAG's investigation of whether the Company and certain of its schools have complied with certain New York state consumer protection, securities, finance and other laws. The

documents and information sought by the NYAG in connection with its investigation cover the time period from May 17, 2005 to the present. Pursuant to the Subpoena, the NYAG requested from the Company, and certain of its schools, documents and detailed information on a broad spectrum of business practices, including such areas as marketing and advertising, student recruitment and admissions, education financing, training and compensation of admissions and financial aid personnel, programmatic accreditation, student employment outcomes, placement rates of graduates and other disclosures made to students.

On August 19, 2013, the Company entered into an Assurance of Discontinuance (the "NYAG Settlement") with the NYAG. Under the terms of the NYAG Settlement, without admitting or denying the NYAG's findings, the Company has agreed to pay \$9.3 million into a restitution fund to be distributed to eligible consumers; an additional \$1.0 million for fees, costs, and penalties; and up to an additional \$0.2 million for the costs to administer the restitution claims process. The Company recorded \$10.0 million related to this matter during the second quarter of 2013 when the matter was deemed both probable and estimable. \$10.3 million was paid during the third quarter of 2013 related to this matter. As part

of the NYAG Settlement, the Company has also agreed to, among other things: calculate and disclose placement rates according to agreed upon procedures and retain an independent consultant or audit firm to independently verify and report on such placement rates; provide specified levels of placement assistance to students; provide certain additional training to admissions personnel regarding placement rates; teach out certain programs going forward that do not achieve specified minimum placement rates; provide additional disclosure concerning institutional and programmatic accreditation; and provide additional disclosure concerning transferability of credits to other colleges or universities.

The Florida campuses of Sanford-Brown Institute received a notice on November 5, 2010 from the State of Florida Office of the Attorney General ("FL AG") that it has commenced an investigation into possible unfair and deceptive trade practices at these schools. The notice includes a subpoena to produce documents and detailed information for the time period from January 1, 2007 to the present about a broad spectrum of business practices at such schools. The Florida campuses of Sanford-Brown Institute have responded to the subpoena and continue to cooperate with the Florida Attorney General with a view towards resolving this inquiry as promptly as possible.

The Company received from the Attorney General of the State of Illinois (IL AG") a Civil Investigative Demand ("CID") dated December 9, 2011. The CID relates to the IL AG's investigation of whether the Company and its schools operating in Illinois have complied with certain Illinois state consumer protection laws. Pursuant to the CID, the IL AG has requested from the Company and its schools documents and detailed information on a broad spectrum of business practices, including such areas as marketing and advertising, student recruitment and admissions, education financing, training and compensation of admissions and financial aid personnel, programmatic accreditation, student employment outcomes, placement rates of graduates and other financial and organizational information. The documents and information sought by the EL AG in connection with its investigation cover the time period from January 1, 2006 to the present. The Company is

cooperating with the IL AG's office with a view towards resolving this inquiry as promptly as possible.

April 2014 status: CEC continues to cooperate and fulfill requests for information from the AGs in Florida and Illinois. No other update regarding these two open inquiries was provided. However, CEC has been served several investigative orders since December 2013 by AGs in 13 states regarding various issues of consumer protection and disclosure. The time period covered by these inquiries and investigations goes back as far as 2006. CEC indicates that it will continue to cooperate with all of these authorities to resolve the matters.

August 2014 status: CEC continues to cooperate and respond to requests for information with a view towards resolving these inquiries promptly. In the institution's most recent public filing with the SEC, it noted that the Attorney General of Connecticut is serving as the point of contact for inquiries received from the attorneys general of Arkansas, Arizona, Connecticut, Idaho, Iowa, Kentucky, Missouri, Nebraska, North Carolina, Oregon, Pennsylvania and Washington (January 24, 2014); Illinois (December

9, 2011); and Tennessee (February 7, 2014). In addition, the Company has received inquiries from the Attorneys General of Florida (November 5, 2010), Massachusetts (September 27, 2012) and Colorado (August 27, 2013). The inquiries are civil investigative demands which relate to compliance with certain state consumer protection laws, focusing on the Company's practices relating to the recruitment of students, graduate placement statistics, graduate certification and licensing results, and student lending activities, among other matters. Information sought covers time periods as early as 2006 to the present.

December 2014 status:

Since August, an additional state-Minnesota-has opened an inquiry into CEC's operations through an Attorney General investigative order. CEC indicates it continues to cooperate with requests for information. A summary of the sources of inquiry and the bases for these inquiries follows:

"The Attorney General of Connecticut is serving as the point of contact for inquiries received from the attorneys general of the following 16 states: Arkansas, Arizona, Connecticut, Idaho, Iowa, Kentucky, Missouri, Nebraska, North Carolina, Oregon, Pennsylvania, Washington (January 24, 2014); Illinois (December 9, 2011); Tennessee (February 7, 2014), Hawaii (May 28, 2014) and New Mexico (May 2014). In addition, the Company has received inquiries from the attorneys general of Florida (November 5, 2010), Massachusetts (September 27, 2012), Colorado (August 27, 2013) and Minnesota (September 18, 2014). The inquiries are civil investigative demands or subpoenas which relate to the investigation by the attorneys general of whether the Company and its schools have complied with certain state consumer protection laws, and generally focus on the Company's practices relating to the recruitment of students, graduate placement statistics, graduate certification and licensing results and student lending activities, among other matters. Depending on the state, the documents and information sought

by the attorneys general in connection with their investigations cover time periods as early as 2006 to the present."

April 2015 status:

The company has recently met with representatives of the multi-state AG coalition to review these issues. No other update is available at this time.

August 2015 status:

CEC continues to cooperate with these open inquiries. No resolution of any of these investigations has occurred yet. With the Connecticut AG serving as the point of contact for attorneys general of Arkansas, Arizona, Connecticut, Idaho, Iowa, Kentucky, Missouri, Nebraska, North Carolina, Oregon, Pennsylvania, Washington, Illinois, Tennessee, Hawaii, New Mexico, and Maryland. CEC is also responding to received inquiries from the AGs of Florida, Massachusetts, Colorado and Minnesota. Over the past several months CEC has participated in several meetings with the AGs about CEC's business and to engage in a dialogue towards a resolution of these inquiries.

The civil investigative demands (CIDs) relate to whether the Company and its schools have complied with state consumer protection laws and focus on the recruitment of students, graduate placement statistics, graduate certification and licensing results and student lending activities.

December 2015 status:

CEC has responded to an August 20, 2015, Civil Investigative Demand from the U.S. Federal Trade Commission (“FTC”) regarding “whether unnamed persons, partnerships, corporations, or others have engaged or are engaging in deceptive or unfair acts or practices in or affecting commerce in the advertising, marketing or sale of secondary or postsecondary educational products or services, or educational accreditation products or services.” The CID requires CEC to provide information regarding a broad spectrum of its business practices and subsidiaries for the time period of January 1, 2010 to the present. CEC indicates it intends to cooperate with the FTC, and will provide its responses to the FTC’s subpoena if requested.

April 2016 Status:

Representatives of CEC continue to meet with representatives of the multi-state AG group in an effort to resolve the inquiries. CEC indicates in its most recent public disclosure to the Securities and Exchange Commission (SEC) that it cannot “reasonably estimate” the range of impacts on the company or what remedies if any might be imposed. In addition CEC indicates that it is cooperating with the FTC to resolve its inquiry, and that it cannot “reasonably estimate” the range of impacts on the company or what remedies if any might be imposed by the FTC.

August 2016 Status:

CEC indicates that the office of the Attorney General of the State of Connecticut continues as the lead agency for a multi-state civil investigative demand of whether “CEC and its schools have complied with certain state consumer protection laws, and generally focus on the Company’s practices relating to the recruitment of students, graduate placement statistics, graduate certification and licensing results and student lending activities, among other matters.” CEC indicates it continues to cooperate with a view towards resolving these inquiries “as promptly as possible.” CEC has met with representatives of the Multi-State AGs and engaged in a dialogue towards a resolution of these inquiries.

In a recent disclosure to share owners and the Securities and Exchange Commission (SEC), CEC has indicated “At the conclusion of any of these matters, the Company or certain of its schools may be subject to claims of failure to comply with state laws or regulations and may be required to pay significant financial penalties and/or curtail or modify their operations. Other state attorneys general may also initiate inquiries into the Company or its schools.”

CEC’s participation in federal student aid programs is provisional currently and extends through December 31, 2016. Each CEC institution must apply for recertification by September 30, 2016 in order to continue its eligibility to participate in Title IV Programs. CEC acknowledges that it “cannot predict whether, or to what extent, any of these inquiries or future

resolutions of these inquiries might impact our Title IV eligibility. Depending on the circumstances of any resolution of these inquiries, ED may revoke, limit, suspend, delay or deny the institution's or all of the Company's institutions' Title IV eligibility, or impose fines. If any of the foregoing occurs, our business, reputation, financial position, cash flows and results of operations could be materially adversely affected.”

The institution further indicated that it “cannot reasonably estimate a range of potential monetary or nonmonetary impact these investigations might have on the Company because it is uncertain what remedies, if any, these regulators might ultimately seek in connection with these investigations.”

In addition, the institution has acknowledged that it continues to receive “informal requests from state Attorneys General and other government agencies relating to specific complaints they have received from students or former students which seek information about the student, our programs, and other matters relating to our activities in the relevant state. These requests can be broad and time consuming to respond to, and there is a risk that they could expand and/or lead to a formal inquiry or investigation into our practices in a particular state.”

Regarding the Federal Trade Commission (FTC) issue, the institution indicates the investigation into its advertising, marketing or sales regarding “deceptive or unfair acts or practices” is in its early stages; that CEC continues to cooperate with the inquiry in order to resolve the issues promptly; and that it cannot estimate potential monetary or non-monetary impact on the company’s ongoing operations.

Computer Systems Institute

School Name: CSI

Location: Chicago

Summary of Issues:

The Department (ED.Gov) has taken actions to decertify CSI’s participation in federal student aid programs based on a series of inquiries by the Office of the Inspector General. The findings of the OIG include placement data integrity and other issues regarding the sufficiency of CSI’s capacity to administer federal student aid.

April 2016 Status:

The institution was ordered to show cause why its grant of accreditation should not be suspended. It will appear in person to defend its compliance with ACICS standards at the April 2016 Council meeting.

August 2016 Status:

The Council acted to withdraw CSI’s accreditation by suspension in April 2016; the institution has appealed the decision to the Review Board; a hearing is scheduled for September 2016.

Daymar College/ National College - Kentucky Attorney General's Office

School Name: Daymar College/National College

Location: Kentucky

Summary of Issues: The Kentucky Attorney General's launched an investigation into Daymar Colleges in that state, citing misrepresentation, admission of students not meeting requirement, falsification of grades etc. They also launched an investigation into National College, citing misrepresentation of placement rates based on a calculation that National was using on their website.

April 2012 Status: Daymar has filed a Motion to dismiss, which will be heard in court May 16. The Kentucky AG office has not provided any information on the specific complaints from which these allegations originated. National College did not respond to staff's request for a status update.

August 2012 status: On June 13, a judge overruled Daymar's Motion to Dismiss. Subsequent to this, Daymar and the Kentucky AG agreed to engage in mediation. A tentative mediation date has been set for September 20. Per the Vice President of Legal and Regulatory Affairs at National College, "There are two matters pending between National College and the Attorney General of Kentucky. In the first matter the AG issued a Civil Investigative Demand which the college believed exceeded his authority in the first place, and was unreasonable in scope in any case. Only one of these issues has been addressed by the court to date, and that ruling is under appeal. In the second matter the AG has alleged that the college violated the Kentucky statute on consumer protection by publishing an employment rate which was calculated differently than ACICS calculates placement rates. The college denies that there was any violation of the consumer protection statute or that the proposition that the only employment calculation the college may publish must mirror the ACICS placement rate formula has any merit whatsoever. That matter is in the early stages of discovery.

December 2012 status: Daymar - The September 20 mediation session was rescheduled for October 23. Daymar officials met with the AG's staff and exchanged information which they believe will lead to the resolution of their issues. They are in continued discussions with the AG office, but no meetings have been scheduled at this time. National College- There have been no substantive updates in the matter. Discovery is still ongoing and National College denies they have committed any violations of the Kentucky Consumer Protection Act.

April 2013 status: No information has been received from Daymar regarding these adverse matters since last fall. Regarding National College, the litigation is still in the discovery phase; there is ongoing communication between the institution and the AG; no other new information at this time.

August 2013 status: Following discovery which ended in March, Daymar executed a deposition in April involving a representative of the Kentucky Attorney General's office. Since then the parties have negotiated a prospective settlement. No settlement has been announced at this time. Likewise,

National College has continued to exchange discovery requests with the Kentucky AG's office, and the process is now at the phase of scheduling depositions. It continues to assert that it has not violated the relevant state statute regarding consumer fraud, and that it will defend itself in that regard.

December 2013 status: Daymar Colleges and the Kentucky AG's office agreed to settle these matters through mediation process. The parties held a mediation session in August of 2013, but failed to reach a settlement at that time. National College has responded to discovery requests from the Attorney General's office, and the discovery process is ongoing, including discovery from the Attorney General's office in response to National College's discovery

requests. Depositions are pending. National College continues to assert that it has not violated the Kentucky Consumer Sales Practices Act and is vigorously defending this action.

April 2014 status: In spite of efforts by Daymar Colleges to reach a negotiated settlement with the Kentucky AG, both parties concluded that they could not reach settlement under the proposed terms. Settlement negotiations ended in January, and the litigation continues. Daymar "remains committed to vigorously defending" against these claims.

More than 2 years ago, National College was served with an investigative demand by the Kentucky AG. The institution cooperated in discovery for an extended period of time. In January the Court directed the Attorney General to appear and show-cause why the matter should not be dismissed for lack of prosecution. In February the AG argued that the case should be permitted to proceed. The Court ruled that the matter would remain on the docket. National College continues to assert "that it has not violated the Kentucky Consumer Sales Practices Act" and is defending against this action.

August 2014 status: Regarding Daymar Colleges, the institution has taken the deposition of Office of Attorney General witness Della Justice and presented several Daymar witnesses for deposition. In the coming months Daymar will present witnesses for deposition and prepare responses to numerous discovery requests. Daymar remains committed to defending against these claims.

Regarding National College, the institution is responding to additional discovery requests from the Attorney General's office of Kentucky, and is itself seeking supplemental discovery from the Attorney General. Depositions have been postponed and are yet to be rescheduled. The College continues to assert that it has not violated the Kentucky Consumer Sales Practices Act and is defending the action by the Attorney General.

December 2014 status:

Regarding National College, the college has requested that the Court schedule the trial at its earliest opportunity, however no trial date has been set. The college is responding to additional discovery requests from the Attorney General's office, and the court has directed the Attorney General to provide supplemental discovery responses. Depositions have been postponed and are yet to be rescheduled. The College continues to assert that it has not violated the Kentucky Consumer Sales Practices Act and is defending itself.

Regarding Daymar, the Court dismissed Count V of the original complaint which alleged Daymar required students to purchase books and supplies from Daymar and prevented students from purchasing books and supplies from other vendors. Daymar had denied this allegation. Daymar will continue to present witnesses for deposition and prepare responses to numerous discovery requests in defending against all remaining claims.

April 2015 status:

Regarding National College, the court has ordered that a mediation occur no later than March 31, 2015 and set the matter for jury trial on September 14, 2015. Mediation was scheduled for March 25, 2015 but was postponed at the request of the AG. The college's responses to the additional discovery requests will be completed this month. Pursuant to the court's order the AG has provided supplemental discovery responses to the college. Depositions have been postponed and are yet to be rescheduled.

Daymar continues to prepare responses to numerous additional discovery requests by the Kentucky AG and to present witnesses for depositions. The institution indicates it will continue to defend against all remaining claims and pursue a "speedy, equitable" resolution to the litigation."

August 2015 status:

Daymar College continues to negotiate a resolution to this litigation. No other updates are available at this time.

American National University (formerly National College) requested the court to schedule the trial at its earliest opportunity. The court ordered that mediation occur no later than March 31, 2015 and set the matter for jury trial on September 14, 2015. The mediation, originally scheduled for March 25, 2015, was postponed at the request of the Attorney General and took place June 29, 2015. No agreement was reached.

In July, at a Status Conference, the court extended the discovery deadline to October 6, 2015 and rescheduled the trial for February 2016. The parties were directed to submit an agreed-upon scheduling order setting additional discovery deadlines and are in the process of negotiating those dates. The College continues to assert that it has not violated the Kentucky Consumer Sales Practices Act and is defending this action.

December 2015 status:

American National University (formerly National College) indicates that it engaged in mediation with the Kentucky AG in June 2015; no agreement was reached. A trial in the matter was scheduled by the

court for February 4 and February 8-10, 2016. However, based on a motion by the AG, the Court granted a continuance. A new trial date has not been set; the parties have been directed to propose a new schedule. ANU indicates that the new trial date will be sometime after July 1, 2016.

Daymar: The institution and the KY AG have reached an agreement that resolves three years of litigation between the state and the college. The agreement requires Daymar to pay \$1.2 million to the AG's office, for distribution to certain students who attended Daymar between 2006 and 2011. It also stipulates that Daymar will forgo \$11 million in institutional debt owed by former students.

A court-appointed monitor will review Daymar's compliance with the agreement for the next two years. The monitor may employ secret shoppers to pose as prospective students during the recruitment process, review complaints, visit campuses, observe admission and financial services training and interview Daymar students and employees. Also, the agreement requires that Daymar must offer a refund period for students, disclose total amount of tuition, median debt for people who complete their education, completion rate, median earnings and a warning about the limitation of the ability to transfer credits.

As part of the agreement Daymar admitted no wrongdoing. Daymar changed its policy regarding textbooks and now includes the price of books in tuition. Daymar has not provided formal notification to the Council of the contents or terms of this agreement.

April 2016 Status:

Daymar: The institution has not provided the contents or the terms of the agreement to ACICS in spite of a formal written request. No other updates are available at this time.

American National University: The litigation continues to move slowly due to numerous discovery disputes involving motions to compel by both parties and most recently a decision by the U.S. Department of Education not to intervene in an issue related to notification requirements pursuant to FERPA. A trial date has been set for October 2016.

August 2016 Status:

Daymar has settled its dispute with the Kentucky Office of the Attorney General.

Regarding American National University, no update has been provided at this time. The institution will be contacted and required to provide the update requested in July, 2016.

Globe University and Minnesota School of Business

School Name: Globe University and Minnesota School of Business

Location: Minneapolis, MN

Summary of Issues: The Minnesota Attorney General has issued a Civil Investigative Demand (CID) derived from lawsuits filed by former employees of the institution. The salient issues are the academic and placement practices of the institution.

August 2013 status: Proactively, Globe has notified ACICS and other agencies of the scrutiny by the Minnesota AG. It has indicated its commitment to placement reporting that is in compliance with standards and reflects integrity.

December 2013 status: Globe received an extension of time to respond to the complaint. Globe has been negotiating with the plaintiffs, but no formal response has been filed with the court. Globe's enrollment agreements, signed by each of the plaintiffs, requires students to pursue internal dispute resolution, and if unsuccessful, to submit the matter to arbitration. Globe asserts that if they are not able to resolve the matter amicably without further litigation, each of the plaintiffs will be required to pursue arbitration individually.

In August 2013, a Washington County jury found Globe liable for a whistleblower complaint. The judgment against Globe has been stayed pending post-trial motions. Globe has filed motions for a new trial and judgment. A hearing was scheduled on these motions on November 15, 2013; the judge has 90 days to rule on those motions. Should the judge deny the motions, Globe intends to appeal.

April 2014 status: Regarding the lawsuit by former students, Globe's enrollment agreement requires students to pursue an internal dispute resolution process, and if unsuccessful, to submit the matter to arbitration. Globe has agreed to participate in mediation. To date, Globe has participated in two mediation sessions. The mediator opined that the arbitration clause in the Globe enrollment agreement would be upheld by the court. Globe continues to participate in mediation. It has filed no formal response with the court.

Regarding the whistleblower lawsuit, in February the court denied Globe's motions for a new trial and upheld the damages awarded in the jury's verdict. The judgment has not been entered and Globe indicates that it intends to request a stay pending appeal. Globe indicates that its schools "are fully compliant with applicable federal and state laws, regulations established by the US Department of Education, and the requirements of our accreditors."

August 2014 status: Regarding the whistle blower complaint: In June, Globe filed an appeal brief with the Minnesota Court of Appeals. Subsequently, the plaintiffs have filed a response brief. A hearing date has not been set.

Regarding the litigation by former students: In May, the plaintiffs voluntarily dismissed the Class Complaint. The parties are exploring informal resolution of the claims.

Furthermore, the Minnesota Attorney General has filed a suit against Globe, a copy which has been provided to ACICS. Globe is in the process of reviewing the complaint.

December 2014 status:

Adverse information against Globe University Inc. and the Minnesota School of Business derived from four different sources continues to generate scrutiny and publicity. The adverse information is related to a whistleblower complaint from a former employee, a class action lawsuit on behalf of former

students, an inquiry opened by the Minnesota Attorney General, and a notification from the U.S. Department of Defense.

The whistleblower complaint, which led to an adverse decision against Globe is under appeal. A ruling is expected mid-January. The Class Action lawsuit was dismissed in May 2014; Globe agreed to an amended complaint and is working toward informal resolution with the complainants. Beginning with an inquiry from the Minnesota Attorney General in mid-2013, Globe has been providing information regarding its recruiting and marketing practices. The AG filed a complaint against the institution in July 2014 on this topic; Globe filed its response in August and discovery is underway. The AG investigation was the basis for notice from the DoD regarding the possible suspension or termination of Globe and MSB's participation in federal tuition assistance programs. Based on Globe's response to this notice the DoD has continued the institutions participation on probationary status for six months.

April 2015 status:

Adverse information against Globe University Inc. and the Minnesota School of Business has continued to generate scrutiny and publicity. The adverse information is related to a whistleblower complaint from a former employee, a class action lawsuit on behalf of former students, an inquiry opened and expanded by the Minnesota Attorney General, and a notification from the U.S. Department of Defense.

The Minnesota Court of Appeals has affirmed the district court ruling in favor of former employee. The Minnesota Supreme Court has refused to review the case, exhausting the appellate remedies of the institution. The judgment stands in favor of the former employee.

The substance of the litigation regarding admissions and student services practices of the institution will be the basis for further inquiry by ACICS.

No mediation or arbitrations have been scheduled in the amended class action complaint initiated by students. This matter has been relatively inactive since November 2014.

Globe continues to contest its probationary status with the Department of Defense (DoD). Globe has asked DoD to reconsider its decision because allegations in the lawsuit referenced as a basis for the decision have not been proven, and Globe has asked why it has been placed on probation "while similar schools with similar or worse allegations have not."

Finally, the Minnesota Attorney General (AG) has amended the complaint against Globe adding allegations regarding placement statistics and the institutional loan program, accusing the institution of violating state law by offering unlicensed college loans to thousands of students and charging "usurious interest rates" of up to 18 percent. The AG has asked the courts to invalidate those loans, known as Educational Opportunities and Student Access loans, and to order the company to reimburse students for all payments on them since 2009. Globe indicates it intends to petition the court to dismiss the most recent allegations. Globe's legal team continues to push for cooperation from the AG. The litigation is in the discovery phase; a mediation is scheduled for May 12, 2015.

August 2015 status:

In June, Globe participated in mediation regarding an amended class action complaint initiated by five students. The mediation was not successful, and a second mediation was scheduled for July 2015. Globe continues in a probationary status with the Department of Defense (DoD), and has not received a response to its request by DoD to reconsider its decision.

In March the Minnesota AG amended the complaint against Globe adding allegations regarding placement statistics and Globe's institutional loan program. Globe has completed the discovery phase of the litigation and participated in mediation on May without success. Globe and the AG intend to file motions for summary judgment. The Court has scheduled the hearing for summary judgment arguments on September 1, 2015. A decision from the judge regarding the motion for summary judgement is expected by December. A trial date has been set for April 2016.

December 2015 status:

Globe agreed to accept service of an amended class action complaint initiated by five students. The institution has participated in three separate mediation sessions with no resolution; the amended complaint has not been filed in court.

Globe remains on probationary status with the Department of Defense in Minnesota (DoD) and has received no response from DoD.

Regarding the Minnesota Attorney General (AG) amended complaint, both parties filed motions for summary judgment. Oral arguments were heard by the judge in September 2015. The judge

is expected to rule on those motions on or before December 30, 2015. The scheduling order requires a second settlement conference in January 2016. A trial date has been set for April 2016.

April 2016 Status:

Globe University has been engaged in mediation regarding the class action lawsuit from former students. The parties have stipulated and agreed to extend the filing deadline for the case to December 1, 2016. No resolution has been reached. Regarding the institution's probationary status with the Department of Defense (DoD), Globe is pursuing the reconsideration of its status.

Regarding the Minnesota Attorney General (AG) amended complaint, both sides filed motions for summary judgment. In December 2015 the judge denied the AG's motion in its entirety, and granted Globe's motion on 2 of the 4 counts; a copy of the redacted order was sent to ACICS. The AG requested the judge reconsider his ruling on each of the summary judgement motions, and the judge denied both requests. In February 2016, the AG filed to appeal the summary judgement ruling, and the Minnesota State Court of Appeals has agreed to hear the AG's appeal. The parties have participated in another mediation session and have continued to attempt to reach a resolution with no success. The trial on the remaining 2 counts of the case commences on April 4, 2016 and is scheduled for 4 weeks.

August 2016 Status:

The institution's probationary status with the Department of Defense has been challenged through a formal request for reconsideration; Globe has not received a response to its request. Regarding issues with the Minnesota Attorney General, the claims dismissed by the trial court were appealed to the Minnesota State of Appeals on June 16, 2016. Court has 90 days to make a ruling. In addition, issues regarding alleged violations of state consumer protection laws were presented at trial that concluded April 26, 2016. A ruling is expected by September 10, 2016.

In addition, issues of financial stability encountered by the Council's Financial Review Committee (FRC) and subject of a show-cause directive will be reviewed by a hearing panel at

the August Council meeting. These issues are indirectly related to the Globe inquiry but have relevance because of the common ownership of Globe and the show-cause institution, Broadview University in Utah.

Harris College of Business / Premiere Education Group – NY Times

School Name: Harris College of Business

Location: Linwood, New Jersey

Summary of Issue: News media reports from February 2014 described litigation filed against Harris College of Business by former employees contending that school officials "routinely misled students about their career prospects, and falsified records to enroll them and keep them enrolled." The complaint is an amended version of a qui tam / False Claims Act lawsuit brought by the same individuals in 2011 but undisclosed publically. After formal investigations, both Federal and State prosecutors declined to prosecute the allegations under federal and state whistle blower statutes. The individuals then decided to pursue litigation through civil action, which prompted the public disclosure and coverage by the news media.

April 2014 status: ACICS reviewed the issues cited in the litigation that may be material to accreditation standards and compliance. Harris was asked to prepare a response to five specific areas (summarized below). In general, Harris developed and provided a comprehensive response, in collaboration with legal counsel, which enumerates the sequence of events leading up to the filing of the lawsuit. Exhibits and other supporting documentation were provided to substantiate the claims in the narrative. Harris indicated it is "cautiously optimistic" that its motion to dismiss the lawsuit will result in "total or at least partial dismissal" of the complaint.

With regard to the specific issues of interest to ACICS:

1. Harris denies the allegation it provided "misleading information to prospective students." The institution conveyed examples of information provided to incoming students. It indicated that it has established a system of controls "to insure compliance with all company, accreditor and regulatory requirements." Specifically, students receive and must sign

a student orientation outline acknowledging they were informed about services offered by the schools' externship/career services; no guarantee of employment or industry certification upon graduation; and no guarantee of transferability of credits.

2. The institution denies that it falsified records of students regarding satisfactory academic progress ("SAP") and federal student aid eligibility. Harris requires its Director of Education to complete a report that tracks students who are at risk of being dropped due to poor attendance. In addition, Harris' attendance documentation includes daily class attendance by the course instructor; recordation of the class attendance documentation by the registrar; and review of attendance records by the Director of Education in order to coordinate contacting absent students. Harris campus officials meet to review disbursements to ensure students are meeting SAP. Harris requires a

Regional Registrar to complete audits of the attendance records of the Linwood Campus of Harris School of Business; the records are reviewed by the Corporate Registrars.

3. Harris denies that it provided misleading information regarding professional certifications and examination eligibility, specifically as it relates to professional certification in the Professional Medical Assistant Program. The Harris catalog "does not, nor has it ever, included any statements that could even be misconstrued as promising students certification." The catalogs state that Harris is accredited by ACICS, "to award diplomas," not certification. Since 2008, Harris has utilized a stand-alone acknowledgment form for enrollees in the Professional Medical Assistant Program:

"Harris School of Business is accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). Upon graduation from the Professional Medical Assistant program (PMA) I understand that I am eligible to take the Registered Medical Assistant (RMA) exam proctored by the American Medical Technologists and the National Certified Medical Assistant exam proctored by the National Center for Competency Testing (NCCT)."

4. Harris notifies applicants of the possibility that a criminal conviction may preclude them from obtaining certain externships or employment. However, in some of the states in which it operates, corrections law expressly provides a proprietary institution may only "discriminate" and/or "screen out" potential applicants based on their criminal history in extremely limited circumstances.
5. Harris denies that its practices conflict with its published standards. Through its corporate parent, Premier Education, Harris routinely performs operational audits (secret shopping) to ensure that enrollment practices comply with its published admissions standards as set forth in the catalog. Harris also offers a campus ombudsman and employee compliance/relations hotline as a resource to students and employees

August 2014 status:

The institution continues to deny any wrongdoing or intentional violation of any federal, state or accreditor requirements, and continues to defend itself. That motion has been fully briefed by the Parties; and the United States has submitted a "Statement of Interest" concerning the motion. Premier has also filed a motion seeking to modify certain court orders so that it is given access to documents and information it believes may be useful in its defense that remain under seal with the court. Given the pendency of a motion to dismiss that could result in the dismissal of the action, discovery (the exchange of evidence) has been stayed.

The parties are awaiting the Court to schedule oral argument on Premier's motion to dismiss. Premier has also commenced a defamation suit against one of the *LaPorte* plaintiffs for making false and defamatory statements. Premier intends to pursue its claims against that *LaPorte* plaintiff.

December 2014 status:

Premier was successful in its request for its dismissal of the complaint in the *LaPorte* action. Every claim against Premier was dismissed with prejudice and the case is closed. Plaintiffs may seek to appeal the dismissal of their claims.

(The Court granted Premier's motion, dismissing all of the primary claims against it, "with prejudice," which means that the plaintiffs may not attempt to revive the dismissed claims against Premier by amending the complaint again. Two (2) ancillary claims brought by two (2) of the seven (7) plaintiffs for alleged "retaliation" were dismissed "without prejudice," and plaintiffs were given a fourteen (14) day deadline to seek permission from the Court to attempt to replead only those claims. The plaintiffs did not seek the Court's permission to replead the retaliation claims in the allotted time so the Court has dismissed those claims "with prejudice".)

April 2015 status:

Plaintiffs in the *LaPorte* case have filed an appeal of the dismissal order of the court.

In addition, the institution has provided details of the provisions of the consent judgement that settled its dispute with the Massachusetts Attorney General's office. Among other issues, the court found no wrongdoing on the part of the institution: "Defendants deny any and all allegations of wrongdoing and any liability for the purported claims asserted in the Complaint, but nonetheless consent to the entry of this final judgment in order to avoid the time, burden, and expense of contesting such liability." The AG consented to this language.

The other provisions of the judgement are:

1. Salter College catalog specifically addressed representations regarding certification exams:

CERTIFICATIONS, LICENSING, STATE & NATIONAL EXAMS

Students are responsible for pursuing and obtaining certification, licensing, as well as participating in state and national examinations. The college makes every attempt to provide

students with accurate information pertaining to test dates, requirements and examination fees. Students are not certified in any way upon program completion. Several programs are designed to prepare students to take various certifications; however, Salter College cannot guarantee students will pass the examinations. In some cases, field experience may be necessary to successfully pass examinations.

2. Regarding employment guarantees, the judgment also requires the school's website provide the following disclosures:

THE SCHOOL HAS NO EXISTING AGREEMENT WITH EMPLOYERS TO PROVIDE JOBS TO STUDENTS AND DOES NOT GUARANTEE EMPLOYMENT. MANY OF THE JOB LISTINGS PROVIDED BY THE SCHOOL ARE COMPILED FROM PUBLIC SOURCES. THE SCHOOL MAY ALSO RECEIVE DIRECT REQUESTS FROM EMPLOYERS OR REFERRALS FOR JOB LISTINGS

FROM GRADUATES WORKING IN THE FIELD, INSTRUCTORS, STAFF MEMBERS, EXTERN PROVIDERS, ETC.

3. Regarding admissions policy, the judgment requires the school's website provide the following disclosure:

THE SCHOOL IS AN OPEN ADMISSIONS SCHOOL AND ADMITS ALL STUDENTS WHO MEET THE ADMISSION CRITERIA AS SET FORTH IN THE CATALOG.

4. With respect to certification, the judgment requires the school's website provide the following disclosure:

THE CERTIFICATE OR DEGREE YOU OBTAIN FROM THIS SCHOOL UPON GRADUATION IS NOT THE SAME AS LICENSURE OR CERTIFICATION FOR EMPLOYMENT, WHICH MAY BE REQUIRED FOR SOME OCCUPATIONS, EMPLOYERS, OR STATES. THE COST OF ANY LICENSURE OR CERTIFICATION OR THE COST OF ANY EXAMINATION FOR LICENSURE OR CERTIFICATION IS NOT INCLUDED IN THE TUITION COST OF THE PROGRAM AND IS ONLY INCLUDED IN THE TOTAL PROGRAM COST IF IT IS SPECIFICALLY ITEMIZED ON YOUR ENROLLMENT AGREEMENT.

The school's website provides the required disclosures at the bottom of each page. The school also provides these disclosures to students in writing prior to enrollment, as required by the judgment. The judgment also requires the school to provide "certain services for current and former students of the school, which are designed to enhance the students' ability to effectively obtain placement in fields related to their education at the school." The judgment also states that "[s]uch services shall be on such terms and timing as are mutually agreed upon by [the School] and the Attorney General." The school has complied with this requirement.

In addition to providing a career development course as part of every program and the usual

services provided by the school's career services department, the school offers students and alumni the opportunity to attend a career counseling seminar. The school held the seminars for its students and alumni at its Massachusetts-based campuses between January 14 through 16, 2015. An additional seminar was held February 17, 2015 at the school's campus in Tewksbury, Massachusetts.

August 2015 status:

A recent decision by the U.S. Supreme Court has the effect of remanding the *LaPorte* action from the Third Circuit Court of Appeals back to the District Court for the District of New Jersey.

All parties have agreed that the District Court must now consider the other arguments Premier's counsel made in favor of dismissing the *LaPorte* case. The matter was recently

returned to the District Court and the assigned judge will soon issue an order setting forth a briefing schedule. Premier's attorneys are preparing to submit briefs which will renew the additional arguments made in favor of dismissing the case in its entirety. These arguments include plaintiffs' failure to allege any actual violation of Title IV regulations, that the complaint has not been pleaded with the required specificity, and that the allegations in the complaint have already been "publically disclosed" and investigated by the federal government.

Premier has also argued that *LaPorte* must be dismissed because plaintiffs allege regulatory violations which are not "conditions of payment", a prerequisite for False Claims Act liability. A federal appeals court validated Premier's position by dismissing False Claims Act claims against a career school that were similar to the claims in this case.

Premier notes that *LaPorte* action has been brought solely by private parties. The Department of Justice had declined to intervene in the action after reviewing the allegations by the former employees and receiving numerous documents from Premier.

December 2015 status:

Based on a U.S. Supreme Court decision regarding the process related to a False Claims Act case, a federal appellate court decision dismissing the *LaPorte* action has been set aside. The Supreme Court's decision was completely unrelated to the substantive allegations of the *LaPorte* action, which Premier claims are without merit. The Supreme Court's decision requires remanding the *LaPorte* action from the Third Circuit Court of Appeals back to the District Court for the District of New Jersey.

Premier indicates that its arguments in favor of dismissal are meritorious. Premier will notify ACICS of the outcome of its motion to dismiss the *LaPorte* action and of any other pertinent updates in the matter.

April 2016 Status:

Harris School of Business continues to contest the appeal of the former favorable court decision by the state of New Jersey. One of the key issues will be argued in front of the New Jersey Supreme Court in

April. The institution notes that the state Department of Justice has declined to intervene in the matter after reviewing the allegations and numerous documents.

August 2016 Status:

No update has been received by ACICS in this matter; the institution will be contacted and required to provide an update.

Herguan University, Sunnyvale, CA – SEVP/ICE

School Name: Herguan University

Location: Sunnyvale, CA

Summary of Issues: The former chief executive of Herguan University (HU) pleaded guilty to visa fraud in the U.S. District Court, for "submitting nearly 100 false documents to the Department of Homeland Security." The Court finding raises issues about the institution's compliance with ACICS *Accreditation Criteria*, Section 2-1-202, Integrity. To address those issues, HU was requested to demonstrate that the systemic and familial relationship issues derived from the Court finding have been remedied.

In addition, HU's eligibility to participate in the admission and enrollment of foreign national students has been put on hold by the federal Student and Visitor Exchange Program (SEVP) of Immigration and Custom Enforcement (ICE) as a result of the court finding against the former CEO.

August 2015 status:

HU indicates that the former CEO has not served in a management capacity since 2012 and has no equity stake in the institution. Because of his fluency in Mandarin Chinese, the executive leadership of HU occasionally consults with him in order to "translate important university business to his father and mother." The former CEO is the son of the owners of the institution.

HU argues that the policies and practices of admitting and matriculating foreign national students that led to the incidences of visa fraud are not issues with the University and staff, only with the former CEO. HU argues that the University has not been accused of any wrong doing by SEVP, only the former CEO was personally accused of wrong doing. Furthermore, HU argues that its normal admissions or matriculation processes were not part of the issue leading to the indictment. HU was unaware of any allegations that student records were incomplete or erroneous, or that policies and procedures or work of other staff were insufficient.

After the arrest of the former CEO, HU changed its process so that only authorized and designated personnel could sign verifications of student enrollment. HU's administrative leadership has directed staff and students to "Do everything according to law, regulation, standards."

HU has submitted an appeal to SEVP regarding its withdrawal of the University's I-17 permission to accept foreign students. HU is seeking an injunction in court for maintaining the I-17 until the appeal has been decided. As of May, SEVP has lifted the deadline for Herguan University to process foreign students.

December 2015 status:

The current status of the adverse information regarding HU involves two issues: the criminal sanctions against the institutions former CEO, and the institutions legal ability to continue to enroll international students under federal immigration regulations. In the first regard, the former CEO was convicted of violating federal law and was sentenced to prison. He also was ordered by the court to pay financial restitution. His eligibility for continued affiliation with ACICS colleges or schools is under review by the full Council under the provisions of 2-3-1000, Debarment.

Regarding HU's certification to enroll international students through the 1-17 program, the SEVP has notified the institution of its intent to withdraw the certification. The institution indicates that it intends to appeal the withdrawal. However, HU has been directed to develop and submit a teach-out plan addressing the contingency that it loses the ability to enroll international students. The teach-out plan and the status of HU's appeal of the withdrawal will be provided for review by the Executive Committee, and by the BPC in April 2016.

April 2016 Status:

Herguan is waiting for SEVP to make a decision regarding the institutions eligibility to continue to serve international students through the DHS student visitors program. In the event SEVP withdraws Herguan's certification, it intends to continue to enroll students and has submitted a teach-out summary for ACICS review.

August 2016 Status:

No update has been received by ACICS in this matter; the institution will be contacted and required to provide an update.

ITT Technical Institute, Carmel IN - CFPB

School Name: ITT Technical Institute

Location: Carmel IN

Summary of Issue: In February, 2014, the Consumer Finance Protection Bureau (CFPB) filed a lawsuit against ITT Educational Services Inc. alleging that the company engaged in "predatory lending by pushing its students into high-cost private loans likely to default, and misled students about their job prospects following graduation." The public allegations produced an immediate and prescriptive letter

from the Senate Assistant Majority Leader to ACICS regarding its oversight of the institution and its operations. ACICS has an obligation to provide an update to the Congressional office following the Council's review of the adverse information.

April 2014 status: In response to the allegations, some of which have relevance to the institution's compliance with accreditation standards, ITT will file information with the Southern District of Indiana within the next 60 days. ITT indicates that the complaint is without merit, and intends to "vigorously contest the CFPB's theories in court."

August 2014 status: At a corporate level, the institution continues to respond to open adverse inquiries at the state and federal levels. A summary of those individual inquiries follows:

ITT Technical Institute, Phoenix, AZ, The Breckinridge School of Nursing and Health Sciences entered into a Consent Agreement with the Arizona State Board of Nursing earlier this month. The program has been placed on probation for three years.

ITT Technical Institute, Louisville, KY- ITT Technical Institute filed a motion to dismiss the lawsuit in January with the Jefferson County Court. A resolution is still pending.

ITT Technical Institute, Indianapolis, IN- ITT Technical Institute filed a motion to dismiss the Consumer Federal Protection Bureau's lawsuit in April, with the Southern District of Indiana. A resolution of that motion is still pending.

December 2014 status:

The primary focus of third party adverse information regarding ITT Educational Services Inc. (ESI) is the financial viability of the enterprise given the required disclosure of the dimensions of the PEAK student lending program. ESI has received numerous requests for information from ACICS regarding its audited FY2013 financial statement, and its ability to meet federal and accreditation financial viability ratios. (Council will review this information through the financial review committee.)

In addition, ACICS has continued to track the status of the following issues at individual campuses and the corporate level:

- ITT Technical Institute, Phoenix, AZ- Breckinridge School of Nursing and Health Sciences entered into a Consent Agreement with the Arizona State Board of Nursing in July. ITT indicates that it remains in compliance with the provisions of the Consent Order.
- ITT Technical Institute, Louisville, KY -ITT Technical Institute filed a motion to dismiss the lawsuit in January 2014 with the Jefferson County Court. Resolution of that motion is pending.
- ITT Technical Institute, Indianapolis, IN- ITT Technical Institute filed a motion to dismiss the Consumer Financial Protection Bureau's lawsuit in April 2014 with the Southern District of Indiana. Resolution of that motion is pending.

- ITT Technical Institute, Rancho Cordova – A previous adverse was closed in August 2014 after the institution received notice from the California Board of Registered Nursing (CBRN) that the warning status on its nursing program had been vacated. However, due to difficulties retaining qualified faculty, program leadership, and sufficient access to clinical opportunities, ITT notified

CBRN in November of its intent to teach-out and voluntarily terminate its Associate of Science degree program in Nursing. The anticipated program end date is June 6, 2015.

April 2015 Status:

ITT Technical Institute, Phoenix, AZ-The Breckinridge School of Nursing, remains in compliance with the consent agreement with the Arizona State Board of Nursing in July 2014.

ITT Technical Institute, Louisville, has filed a motion to dismiss the lawsuit, and the resolution of that motion is still pending.

ITT Technical Institute, Indianapolis, filed a motion to dismiss the Consumer Financial Protection Bureau's lawsuit. Recently, the court granted the motion in part, and denied the motion in part.

August 2015 status:

A court hearing is scheduled for September 11, 2015 on enforceability of the enrollment agreement that is the basis for litigation brought by Mr. Rodford Seabolt against ITT Technical Institute. The institution denies the allegations and intends to “continue to defend vigorously against the allegations made in the complaint.”

Regarding the complaint by the CFPB against ITT Technical Institute for “unfair, deceptive and abusive acts and practices” for six months in 2011, including failure to comply with the federal Truth in Lending Act that requires “certain disclosures to be made in writing to consumers in connection with the extension of consumer credit,” and “failing to disclose a discount that constituted a finance charge,” the institution’s motion to dismiss the CFPB Litigation was denied in part by the Court and granted in part. Specifically, the court dismissed the CFPB’s claim under the Truth in Lending Act. ITT has filed a notice of appeal to the federal circuit court seeking dismissal of the remaining aspects of the complaint.

Regarding investigations brought by state attorneys general:

- ITT had removed the New Mexico Litigation to the U.S. District Court for the District of New Mexico, but upon the AG’s request, the matter was remanded to state court. The complaint alleges, among other things, that ITT “engaged in a pattern and practice of exploiting New Mexico consumers by using deceptive, unfair, unconscionable and unlawful business practices in the marketing, sale, provision and financing of education goods and services in violation of New Mexico's Unfair Practices Act.” No investigation is pending at this time.

- Beginning in January 2014 and through June 2015, ITT has been in receipt of civil investigative demands from attorneys general of Arkansas, Arizona, Colorado, Connecticut, Hawaii, Idaho, Iowa, Kentucky, Maryland, Minnesota, Missouri, Nebraska, North Carolina, Oregon, Pennsylvania, Tennessee, Washington and the District of Columbia under the authority of state consumer protection statutes. The Kentucky AG has been designated as the point of contact for the multi state group. The inquiries relate to students and practices, including marketing and advertising, recruitment,

financial aid, academic advising, career services, admissions, programs, licensure exam pass rates, accreditation, student retention, graduation rates and job placement rates, as well as other aspects of ITT's operations. The company indicates that it is cooperating with the attorneys general.

- The Office of Illinois Attorney General has indicated that is an interested party to the multi state attorney general group. No other action has been taken by the Illinois Attorney General.

Regarding conditions placed on ITT by the Florida Commission on Independent Education primarily due to the delayed submission of the 2013 audited financials, CIE has continued the provisional license for all Florida campuses until December 2015. The institution is required to submit a roster of current and prospective students, teach-out plans, retention plans, monthly progress reports, profit and loss statements for each Florida campus, and audited financial statements for ITT Educational Services, Inc. The institution is also required to provide CIE with copies of any dispositive motions filed by any party and their appeals, and any court orders in the CFBP and SEC cases within ten days of their filing or rendering; provide CIE with any correspondence to or from the U.S. Department of Education within 10 days of sending or receipt.

Regarding ITT's litigation against the California State Approving Agency for Veterans Education (CSAAVE), the state courts have granted a stay, temporarily lifting the suspension of approval of veterans' educational program benefits to students enrolled at ITT campuses in California. The suspension precluded ITT campuses from future enrollment or re-enrollment of veterans or their dependents intending to utilize the GI Bill Programs' education benefits to pay in whole or in part for their enrollment. The basis for the suspension was that "the campuses did not fully comply with the financial stability standards for accreditation published by ACICS." ITT submitted information from ACICS to CSAAVE regarding financial stability standards and requirements for ITT's accreditation, however, CSAAVE refused to lift the suspension order, prompting the institution to seek relief through the courts. Pending the court's adjudication of ITT's petition on August 21, CSAAVE's suspension of approval of ITT's courses for enrollment by veteran students is lifted. The court ordered that CSAAVE and CalVet shall not issue any further notice to ITT's veteran students about the suspension, and that CSAAVE and CalVet shall notify the public of the lifting of the suspension.

Finally, regarding the status of the action brought by the SEC against ITT's corporate parent for accounting issues and disclosures regarding the institutional student lending program, the SEC filed a civil enforcement action against ITT, CEO Kevin M. Modany and CFO Daniel M. Fitzpatrick in U.S. District Court in May. Among other assertions, the complaint alleges that the defendants engaged in a fraudulent scheme and course of business and made various false and misleading statements to our

investors relating to the CUSO Program and the PEAKS Program. ITT had been responding to discovery requests from SEC staff since February 2013; staff made a preliminary determination in August 2014 to recommend that the SEC file an enforcement action against ITT. The institution then presented evidence as to why such an enforcement

action should not be taken and explained that any perceived shortcomings were “acts taken in good faith.”

Remedies sought by the SEC include 1) a finding that each of the defendants committed the alleged violations; 2) an injunction permanently restraining and enjoining each of the defendants from violating, directly or indirectly, the laws and rules alleged in the complaint;

3) an order that Modany and Fitzpatrick be permanently prohibited from acting as an officer or director of any public company; 4) disgorgement of any and all ill-gotten gains, together with pre- and post-judgment interest, derived from the improper conduct alleged in the complaint; 5) civil money penalties in an amount to be determined by the court, plus post-judgment interest; 6) an order that Modany and Fitzpatrick reimburse ITT for all bonuses, incentive-based and equity-based compensation, and/or profits realized from their sale of ITT stock pursuant to Section 304 of the Sarbanes-Oxley Act of 2002. ITT indicates its intention to defend against the allegations in the SEC complaint.

December 2015 status:

ITT has reported to the Department that it has fully reconciled Title IV disbursements for all of its main campuses for the currently open award years.

Regarding prior award years, ITT performed activities intended to reconcile its accounts with those of the Department. When ITT discovered that “those activities were not completed properly or completely,” it released from employment the individuals who were previously responsible for the proper reconciliation of the accounts, and initiated the review and reconciliation of the student account balances for each year. ITT claims that no students were negatively impacted by the reconciliation activity, as no student loan balances were increased for any closed award year. The institution claims that the total amount of adjustments made to reconcile student accounts were not material to the overall amounts disbursed for each closed award. ITT indicates that the Department’s Internal Controls Division, has confirmed that ITT is now fully reconciled for all prior years.

ITT acknowledges that prior to August 27, 2015, it did not have a written policy specifically related to the reconciliation of Title IV accounts. Subsequently, ITT indicates it has drafted new procedures designed to address the Department’s findings; the drafts have been submitted for ED’s review and approval.

ITT acknowledged that it requested the Department to reopen prior closed award years wherever an adjustment was required for student disbursement amounts. ITT has completed reconciliation issues for prior years; is reporting all reconciliation activity for the current award years on a monthly basis. ITT

claims “there will not be any further reconciliation issues that our institution cannot immediately address.”

Regarding the new Civil Investigate Demand (CID) issued by the Department of Justice (DOJ), ITT claims it has no explanation for the basis of the action. When the government completes its investigation and makes its intervention decision, the lawsuit will be unsealed and ITT will be served with the complaint.

Regarding ITT’s alleged violations of incentive compensation regulations, the institution indicates that it “no longer adjusts the compensation of representatives and financial aid coordinators even in part based on the number of students they enroll or assist in obtaining financial aid.”

April 2016 Status:

New information derived from the news media and other sources was encountered by ACICS during the first quarter of 2016. The four new issues: 1) Instructional materials of insufficient quality; 2) lack of monitoring satisfactory academic progress; 3) academic credit transferability; 4) sufficiency of academic counseling and guidance; 5) admissions and recruitment. Based on the information, ACICS required ITT to provide responses to each of the areas of alleged deficiency, develop and provide a teach-out plan for review by Council, and to continue to provide periodic updates regarding the institution’s financial status in response to previous adverse information requests. ITT indicates in its response to ...

The first issue:

“Without specific information about particular textbooks which may have typographical errors, I am limited in my ability to conduct any further inquiry. However, as a general practice, all instructional materials are routinely monitored for any inaccuracy or inconsistency, and such instances are promptly remediated.”

The second issue:

“ ITT attendance requirements for all students are clearly set forth in the student catalog. Student participation is at the discretion of each individual student. However, where participation is designated as a component of the grading rubric for a course, individual students who do not participate in class would be at a disadvantage in receiving credit compared to their peers who would actively participate.”

The third issue:

“ITT institutions have articulation agreements with certain institutions, and these agreements are disclosed to current and prospective students on our website. In recognition of this reality (difficulty of transferring academic credit between any two institutions) our institutions strive to ensure that all students are aware of this possibility prior to enrollment.”

The fourth issue:

“ITT institutions provide employment assistance and document such activity. We do not guarantee employment or the starting salary of our graduates. We describe the career services that we provide to current students and graduates in the school catalog. Accordingly, we are unable to respond to a general, unsubstantiated claim that certain students may have been excluded from employment opportunities due to the source of their credential. We specifically do not make any representations to current or prospective students about their ability to obtain gainful employment following graduation.”

The fifth Issue:

“Significantly, students are required to sign and date this form, and the following disclosure is provided immediately above where the student must sign:

Students and graduates may utilize the school's career employment services. However, these statistics are for information purposes only and the school DOES NOT make any promise or representation whatsoever to any student or graduate.

If an instructor were to determine that a student was not academically prepared or otherwise competent to pursue a postsecondary education, it would not be inappropriate to advise the student accordingly.

Teach-Out Plan Due to Declining Enrollment Numbers:

“In the event our institution elects to curtail or suspend operations at any ITT Technical Institute campus, we will continue to apprise ACICS of these decisions consistent with our demonstrated ability to successfully execute a institutional teach-out plan. During the last two years, we have received submitted 10 campus closure plans for ACICS approval, and have successfully closed each campus.

“In each prior instance, our decision to close a campus was made after careful consideration and deliberation, and a comprehensive plan was submitted to ACICS to help ensure that we would effectively protect the interests of our students during the transition period prior to closing the campus (as well as to satisfy the requirement that all member campuses submit a formal Teach-Out Plan for approval upon the occurrence of any event outlined in the Section 2-2-300 of the *Accreditation Criteria*). Based upon our prior history of effective execution, any decision to close additional campuses will follow our established process and methodology.”

August 2016 Status:

ITT Technical Institute has provided information to the Council in response to a show-cause directive and will be afforded an opportunity to explain the basis for this adverse case before a hearing panel of the Council on August 4, 2016.

ITT Technical Institute Louisville, KY

School Name: ITT Technical Institute

Location: Louisville, KY

Summary of Issues: Three plaintiffs, former students in the Nursing program at ITT Technical Institute, Louisville, KY, filed suit in September, 2013 in the Circuit Court. The plaintiffs allege that ITT committed fraud, fraudulent inducement, negligence, negligent hiring, supervision and retention, breach of contract, violations of the Kentucky Consumer Protections Act. The plaintiffs also allege unjust enrichment, discrimination, willful, intentional, malicious and oppressive conduct, civil conspiracy and forgery in connection with their education at the Breckenridge School of Nursing and Health Sciences, ITT Technical Institute.

December 2013 status: ITT denies these allegations and intends to vigorously defend the action. ITT's institutional Enrollment Agreement provides that all student-originated disputes are subject to arbitration. ITT will move to dismiss the matter or alternatively, stay the litigation and compel the matter to arbitration.

April 2014 status: The Breckenridge School of Nursing and Health Sciences @ ITT Technical Institute in Louisville, KY, has filed a motion to compel arbitration in this matter. A hearing on the motion was held in March. A ruling from the court anticipated within 60 days.

August 2014 status: See corporate.

December 2014 status: See corporate.

April 2015 status: See corporate.

August 2015 status: See corporate.

December 2015 status: See corporate.

Michigan Jewish Institute

School Name: Michigan Jewish Institute (MJI)

Location: West Bloomfield, MI

Summary of issues:

A former employee has filed a lawsuit against Michigan Jewish Institute (MJI), for wrongful termination. Among the allegations in the complaint is a statement that MJI perpetrated "in statements to the Department of Education regarding "an elaborate staging - to give appearance of a University"... in anticipation of scheduled audits of (MJI)." Specifically, the former employee in his complaint alleges the staging was in advance of a team visit by ACICS.

April 2015 Status:

MJI has filed a motion to dismiss the complaint. The Judge has issued an order allowing the Plaintiff to amend his complaint by February 2015. Once served, MJJ shall have 21 days to respond. MJJ alleges that their ability to rebut the complaint is hampered by "vague allegations... that lack critical details, such as the who, what, where, why, or when." MJJ denies undertaking any efforts to deceive or mislead representatives of the U.S. Department of Education or any other body.

August 2015 status:

The action brought against MJJ by a former employee was dismissed by the court; the plaintiff's time interval to appeal the decision has expired. MJJ has been notified that the adverse file on this matter has been closed.

New Adverse:

In July, facilities of Michigan Jewish Institute (MJJ) were visited by agents of the Office of The Inspector General, U.S. Department of Education. Information provided through public sources indicates the institution's paper records and computer resources were confiscated. The purpose of the visit was ambiguous, as well as the extent to which the event disrupted or continues to disrupt the institution's education programs. In addition, the institution's participation in the Federal Student Aid program was conditioned in the same timeframe (Heightened Cash Monitoring 2); the basis for the conditioning was "lack of administrative capability." The institution is developing a response to the new adverse information.

December 2015 status:

MJJ has had no substantive interaction with the Department of Education Office of Inspector General (OIG) regarding the status of the review. MJJ has been in contact with OIG to request certain records that were taken off site in July. MJJ has not received any additional requests for information or documents from OIG.

Regarding MJJ's transition to HCM2, the institution has engaged a consultant to help it prepare and review its reimbursement requests. The institution has prepared several hundred student files for submission to ED. MJJ expects to be able to send a significant reimbursement request to ED by the end of December. A test file sent to an ED payment analyst was found to be complete and in order, based the response from MJJ. MJJ indicates that ED has placed no new or additional conditions on its participation in federal student aid programs.

MJJ also wishes to inform the Council that it has secured a financing commitment from a third party lender that will ensure MJJ has sufficient cash flow to meet its current financial obligations until ED begins to make payments to MJJ pursuant to its reimbursement requests.

April 2016 Status:

MJI was notified of decertification for Title IV participation by the Department in February 2016 and ACICS opened a new adverse, including show cause directive for the April 2016 meeting and a teach-out plan. The three issues of concern were fiduciary responsibility to manage Title IV funds; administrative capacity to administer Title IV funds; and misrepresenting placement performance to ACICS.

The show cause hearing in writing will produce a recommendation to the Full Council this week. MJI elected not to submit a teach-out plan as required by the adverse letter from ACICS.

August 2016 Status:

MJI notified ACICS of its voluntary withdrawal of accreditation effective July 31, 2016. ACICS has acknowledged the withdrawal in writing, and has directed the institution to remove all references to ACICS from its marketing, student documentation and online materials immediately. In addition, ACICS directed the institution to inform its students of the withdrawal of accreditation.

SAE Institute – Placement Data Integrity Issues, Raised by Previous Accreditor

School Name: SAE Institute

Location: New York, NY

Summary of Issues:

Over a period of several years two programs at the New York campus fell short of placement standards set by SAE's former accreditor. On that basis, the programs were directed to cease enrollment and to demonstrate a capacity to meet placement standards before resuming operation. Those conditions were intact when the campus withdrew its accreditation from the previous agency and established accreditation under ACICS.

April 2016 Status:

As required by the previous accreditor, SAE has suspended enrollment for the two programs in question. It has also provided evidence to ACICS that at the time of its withdrawal of accreditation, the campus was in good standing.

August 2016 Status:

No update is available from the institution at this time. SAE will be required to provide an update to ACICS in August 2016.

School Name: Spencerian College

Location: Louisville and Lexington, KY

Summary of Issues: The Attorney General of Kentucky has filed a lawsuit claiming that Spencerian College violated the Kentucky Consumer Protection Act, by providing unfair, false, misleading and deceptive information to consumers about job placement rates, graduation success and Spencerian operations in general. Specifically the complaint alleges discrepancies between placement rates reported to ACICS and those advertised by Spencerian.

April 2013 Status: Spencerian responded in February denying the claims. Discovery has commenced by Spencerian and the Attorney General. The institution anticipates litigation will require at least 18 months to resolve.

August 2013 Status: The litigation continues in the discovery stage. Spencerian College is producing volumes of data and documents in response to the interrogatories of the Kentucky Attorney General. The discovery process is anticipated by Spencerian College to continue for at least another three months.

December 2013 status: Counsel for Spencerian College and the Kentucky Attorney General's Office are currently in the process of trying to resolve certain discovery issues which have arisen with respect to the applicability of FERPA regulations to certain documents/data requested to be produced. No additional information is available at this time.

April 2014 status: Discovery continues in the lawsuit brought by the Kentucky AG, resulting in a voluminous number of documents and data. The document production by Spencerian will involve "the production of hundreds of thousands of documents and data." Counsel for Spencerian and the Kentucky AG's Office continue to work on certain discovery issues regarding the applicability of FERPA regulations to certain documents and data. Spencerian indicates it will defend the lawsuit and denies the claims that it violated the Kentucky Consumer Protection Act.

August 2014 status: The Lawsuit against Spencerian by the Kentucky Attorney General continues to be in the initial discovery stage. The institution is preparing answers to interrogatories and accumulating a voluminous number of documents/data requested; discovery is not yet completed. Counsel for Spencerian College and the Kentucky Attorney General's Office continue to try to resolve certain discovery issues which have arisen with respect to the applicability of FERPA regulations to certain documents/data requested to be produced. The FERPA issues have been narrowed, but no final agreement with respect to FERPA notifications has been reached. No other additional information is available.

December 2014 status:

The institution indicates that it continues to cooperate with the Attorney General in the discovery stage. Spencerian has produced more than 100,000 documents and continues to receive requests for more information. Issues have arisen in discovery regarding the applicability of FERPA regulations that have not been resolved. No additional information at this time.

April 2015 status:

The lawsuit continues in the initial discovery stage, during which Spencerian College has submitted well over 100,000 documents to the KY AG. Spencerian College and the AG continue to try to resolve certain discovery issues with respect to the applicability of FERPA regulations to certain documents and data requests. There remain additional discovery issues with FERPA implications which have not been resolved.

August 2015 status:

Spencerian College and the Kentucky AG continue to negotiate discovery with respect to the applicability of FERPA regulations to certain documents/data requested. The FERPA issues have been narrowed, and FERPA notifications have been sent to Spencerian graduates. Additional discovery issues with FERPA implications have not been resolved.

December 2015 status:

The litigation continues to be in initial discovery. Spencerian College has responded to interrogatories from the Kentucky Attorney General by providing well over 100,000 documents. Counsel for Spencerian and the Kentucky AG are negotiating the resolution of certain discovery issues related to FERPA regulations. FERPA notifications have been sent to Spencerian graduates. However, additional discovery issues with FERPA implications have not been resolved.

April 2016 Status:

Litigation continues to be in the discovery stage. Spencerian College has submitted answers to Interrogatories and well over 100,000 documents in response to requests. Counsel for the College and the AG's Office continue discuss certain discovery issues with respect to the applicability of FERPA regulations to certain documents/data requested. The FERPA issues have been narrowed, and notifications have been sent to Spencerian graduates. There remain, however, additional discovery issues with FERPA implications which have not been resolved.

August 2016 Status:

No additional information has been provided by the institution at this time. ACICS will require an update in August 2016.

School Name: Wright Career College

Location: Overland Park, KS

Summary of Issues: Based on news media reports ACICS learned that Wright Career College is subject to a lawsuit by nearly 200 former and current students alleging the institution “purposefully enticed prospective students to enroll and apply for student loans they cannot pay back through a systematic, deceptive marketing scheme.”

December 2014 status:

The lawsuit is the only active lawsuit currently on file against the College. It was originally filed in November 2013. After some of the original plaintiffs graduated from the College, plaintiffs’ legal counsel moved to amend the lawsuit to name an additional 194 students. The complaint does not specify with any particularity what misrepresentations were made by whom, to whom or when. Instead, the complaint alleges generally that the *College* engaged in a “systematic, deceptive marketing scheme . . . through its publications, televised ads and enrollment ‘advisors’” and made “fraudulent misrepresentations and omissions about federal financial aid, the true cost of attending WCC [the College], the value of WCC’s [the College’s] accreditations, the quality and reputation of its academic programs, and the employment prospects and career placements services its graduates can expect.”

The college asserts that the claims are “completely without merit.” The college indicates that it is likely the Court will narrow the claims and number of plaintiffs after pre-discovery and post-discovery, and that this case will not be resolved without a trial. The college also indicates it has communicated the lawsuit to students and staff, and intends to defend itself against the claims.

April 2015 status:

The court has granted motions by the college to dismiss several claims, including those relating to negligent hiring/retention, accounting, punitive damages, and civil conspiracy. The Court also ruled that Plaintiffs were barred from using alleged misrepresentations regarding “nuances of the educational process,” and alleged fraudulent statements that the program was “adequate” and instructors were “experienced in their respective fields.” Further, the plaintiffs voluntarily withdrew 29 parties from the lawsuit. As a result, 166 plaintiffs remain. The plaintiffs have been ordered to respond to a written questionnaire no later than April 20.

August 2015 status:

Litigation Developments: Plaintiffs in the litigation against Wright Career College have filed a Third Amended Complaint, to which WCC has responded. In compliance with the Court’s order, each plaintiff has responded under oath, to a written questionnaire regarding background information about themselves, their education at the College, and their claims. These responses represent “the first meaningful opportunity” that WCC has had to assess the basis of the claims. No other meaningful

discovery has occurred. The parties are currently conferring on a proposed schedule which would set out the deadlines for the selection of the bellwether plaintiffs and the deadlines for discovery.

December 2015 status:

Derived from court filings and actions since August, the litigation brought by Stephanie Ayala now includes 169 plaintiffs. Plaintiffs sought permission to file a Fifth Amended Complaint, which was denied by the Court. Wright College indicates that “the Court made clear that there is no cause of action based upon quality of education.” In addition, the Court ordered the parties each to select six bellwether plaintiffs. The twelve cases will proceed through discovery with six being set for individual trials. The first trial will be of a student selected by Plaintiffs; the second will be of a student selected by the College. The trials will continue to alternate in that manner. Scheduling orders have not yet been entered in the twelve cases.

In addition, Wright Career College is facing litigation by eight former Surgical Technology students who claim “they were promised that they would be taught certain skills that would allow them to become certified surgical technologists, that they were not taught those skills, and that they have been unable to find employment as a result.”

In August, the college requested the court dismiss two of the Plaintiffs' claims because they had previously filed identical claims which had been dismissed with prejudice in federal court. In November, the Court entered an order converting the Motion for Judgment on the Pleadings to a Motion for Summary Judgment and giving the college thirty days to provide additional support for the motion. Because of the pending Motion, no discovery has been conducted and no scheduling order has been entered.

April 2016 Status:

Regarding the lawsuit by Ms. Ayala, the institution and the plaintiffs have chosen bellwether cases that will go to trial beginning in May 2017. Discovery has begun in preparation for the trial. Regarding the lawsuit by Ms. Martin, the institution has filed a motion for summary judgement that would dismiss the action. It is currently pending, and the case is set for trial in October 2016. No discovery has commenced at this time.

August 2016 Status:

The institution has closed.

Everest College – Audit Findings by Virginia Higher Education Council (SCHEV)

School Name: Everest College

Location: Chesapeake, VA

Summary of Issues:

Based on an audit by the staff of SCHEV in January 2016, the institution was found to be out of compliance with nine requirements of the state of Virginia. Those issues related to catalogue disclosures, course work completed in residence, faculty qualifications, administrator availability, and fidelity to enrollment agreements.

April 2016 status:

Information provided in writing by Everest College to SCHEV in February was deemed sufficient to address all of the issues raised in the audit. Everest was notified of its satisfactory resolution of the findings on March 23, 2016; SCHEV required no further action.

August 2016 Status:

The case has been referred to the At-Risk Institution Group (ARIG) for further review. In addition, Zenith Education Group has provided information to the Council that will be reviewed during the show-cause hearing on Wednesday, August 3, 2016.

EDUCATION ENHANCEMENT AND EVALUATION COMMITTEE MINUTES

Thursday, August 18, 2016

4:00 PM – 6:00 PM

Committee Members

Ms. Julie Blake, Chair

Ms. Michelle Edwards

Mr. Jay Fund

Dr. Adriene Hobdy

Dr. Deborah Jones

Dr. Rafael Ramirez-Rivera

Dr. Edward Thomas

Staff Liaisons

Dr. Terron King – Primary Liaison

Ms. Terrasia Covington – Secondary Liaison

Other

Commissioner Luis Llerena

Commissioner Fardad Fateri

Ms. Latoya Boyd

Ms. Jan Chambers

Ms. Susan Greer

Mr. Ian Harazduk

Mr. Chad Hartman

Ms. Cathy Kouko

Ms. Linda Lundberg

Ms. Niana Moore

Ms. Katie Morrison

Ms. Samantha Shellum

Ms. Shaniqua Smith

Mr. Maurice Wadlington

Ms. Perliter Walters-Gilliam

Ms. Karly Zeigler

I. CALL TO ORDER

Chair Blake called the meeting to order at 4:00 PM., August 18, 2016.

II. OLD BUSINESS

COMMITTEE: EEE/8.16/1

DATE: August 18, 2016

SUBJECT: Defining Basic Records

STAFF: Ms. Terrasia Covington

ISSUE

Policies regarding records maintenance and retention require clarification; specifically, defining what the Council regards as “basic” records.

OVERVIEW

In reference to **Section 3-1-303(f)(g) and Glossary**, there is confusion in the field regarding the requirements for records retention. Specifically, it is not clear which records must be protected and maintained and for how long. One approach may be to require the institution to have a policy for record retention and for the Council to provide general guidelines.

The Council directed the staff to conduct research on student records. The Council suggested reviewing and receiving guidance from AACRAO (particularly on the retention of student records). The Council also suggested that upon this review the *Criteria* language will need to be updated. Specifically, the language should define the “basic” record for protection (to include the academic record, financial aid record, application materials, and counseling [for purposes of accreditation and program reviews]). There should be a separate definition for the basic record as it deals with maintenance, which should include the permanent academic record.

In addition, the Council noted that some agencies, such as States and Title IV, have their own standard for records retention policies and ACICS should have a flexible enough policy to accommodate those rules.

Section 3-1-303. Records.

(f) All ~~basic~~ records and reports pertaining to students shall be safely protected. Records shall be stored consistently in a manner that provides protection against misuse, misplacement, damage, destruction, or theft.

Acceptable methods of protecting records from theft, fire, water damage, or other possible loss include electronic records management systems and software, appropriately fire-rated file cabinets (that can be and are locked when not being used); a central location such as a vault, the entirety of which is protected; ~~and microfilmed records, computer disk, backup tape,~~ printout records, or other hard copies of records protectively stored off the premises.

(g) Certain basic records shall be maintained by the institution for a specified period of time. The institution shall adopt and publish a policy on the responsibility and authority of the institution to properly maintain and retain such records. At a minimum, the policy should address the following document retention requirements:

1. ~~Transcripts~~ Academic records should shall be kept maintained indefinitely permanently (see *Record, Permanent Academic* in Glossary);
2. ~~Admissions data and other advisement records should shall~~ be kept for at least five years from graduation or the last day date of attendance (see *Record, Admissions and Advisement* in Glossary);
3. Financial aid records shall be maintained according to the record retention policies and guidelines established by the funding source (see *Record, Financial Aid* in Glossary).

The institution shall comply with its published policy on records maintenance and retention.

Glossary of Definitions

Record, Admissions and Advisement. Official documents of admissions data, counseling, and advising. Such documents include but are not limited to, applications for admission or readmission (for matriculants), admission letters, denial and waitlist notifications, aptitude/assessment test scores, military records, degree audit records, transfer credit evaluations, transcripts reflecting degrees earned from other institutions, and counseling and advising correspondence.

Record, Permanent Academic. ~~The Official documents on which is listed the courses attempted, grades and credit earned, and status achieved by a student of the student's scholastic progress.~~ Such documents include, but are not limited to, official transcripts; final grade reports detailing each course code, course title, and final grades for a given year and term; and any documented change to final grades.

Record, Financial Aid. Official documents regarding any grant, scholarship, or loan offered to assist the student in meeting college expenses. Documentation may vary depending upon the funding source (e.g. state or federal programs, high schools, foundations, or corporations).

Record, Student. A record (electronic or hard-copy) which is comprised of, at a minimum, a student's admissions and advisement, permanent academic, and financial aid records. ~~A file which may contain the following: a record of the student's scholastic progress, the extracurricular activities, personal characteristics and experiences, family background, secondary school background, aptitudes, interests, counseling notes, etc.~~

OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.

2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Ramirez moved to accept option 1 as proposed.

SECONDED: Commissioner Jones moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting]

NEW BUSINESS

COMMITTEE: EEE/8.16/2

DATE: August 18, 2016

SUBJECT: Library, Instructional Resources and Technology

STAFF: Dr. Terron King

ISSUE

The following proposed revisions to the Accreditation Criteria for Library, Instructional Resources and Technology are being recommended:

- Revision of outdated technology language.
- Revision of language to allow for a centralized library budget for multiple campuses.
- Addition of language requiring campuses to have a physical library resource center on-site or within close proximity to the institution.

OVERVIEW

The Library, Instructional Resources and Technology sections of the Accreditation Criteria were one of the focus areas of ACICS' 2014 Systematic Review. This item was discussed during the 2015 Policy Meeting and an ad hoc committee was created to work with staff on the revision of the language to bring back to the February 2016 Policy Meeting for further discussion.

CRITERIA

3-1-800 – Library Resources and Services

The adequate provision of library resources and information services, appropriate to the academic level and scope of an institution's programs, is essential to teaching and learning. It is incumbent upon all member institutions to assess the level of library resources needed in relation to their programs and to provide a range of support to meet these needs. The size of collections and the budget allowed for library resources and services do not ensure adequacy. The quality, relevance, accessibility, availability, and provision of support services ultimately will determine the adequacy of an institution's efforts. In assessing library resources and services, ACICS requires that an institution, at a minimum, shall:

- (a) ~~develop an adequate base of library resources~~ provide students access to a physical learning resource center on-site or within close proximity to the institution;
- (b) ~~(a) develop an adequate base of library resources~~ to ensure academic success and to meet instruction and research needs as appropriate;
- (c) ~~(b) ensure~~ up-to-date means to access these resources;
- (d) ~~(c) develop a continuous assessment strategy for library resources and information services~~ that includes staff and faculty;
- (e) ~~(d) provide adequate staff to support~~ assessment, library development, collection, organization, and accessibility;
- (f) ~~(e) ensure that library services are provided to all learners, including those at nonmain campuses~~ and those online; and
- (g) ~~(f) provide training and encouragement for students and faculty to utilize library resources as an integral part of the learning process~~ and as life-long learners.

3-2-200 – Instructional Resources, Materials

The instructional resources, audiovisual teaching equipment, and instructional materials shall be adequate to serve the needs of the institution's educational programs. The resources shall include current print or digital titles, periodicals, professional journals, and/or full-text online resources appropriate for the institution's educational programs. There shall be evidence that appropriate instructional resources, equipment, technology, and materials are utilized to support the educational objectives.

3-2-201. References. The institution shall have available and easily accessible to faculty and students standard print, digital, or online reference works appropriate to the curriculum. Major consideration will be given to the diversity of the collection including variety of volumes books, periodicals, online resources and information technology readily available to students and faculty, ~~reeency~~ their currency of publications, appropriateness, and relevance to the programs offered by the institution.

3-2-204. Budget. Budget allocations and expenditures for instructional resources, equipment, and materials may be centralized and shall be sufficient to meet the needs and fulfill objectives of the institution's programs.

3-3-402, 3-4-402, 3-5-402, 3-6-702, 3-7-702. Budget. An annual library budget, appropriate to the size and scope of the institution and the programs offered, ~~shall~~ may be central be established and the allocation expended for the purchase of ~~books, periodicals,~~ library equipment, print and/or digital books, periodicals, and other resource and reference materials.

3-3-403. Function. The library function is shaped by the mission and the educational programs of the institution. Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings. The resources shall include the study, reading, and information technology facilities necessary to make the educational programs effective. The ultimate test of the library's adequacy is determined by the extent to which its resources support all the courses offered by the institutions.

3-4-403, 3-5-403. Function. The library function is shaped by the mission and the educational programs of the college. Appropriate reference, research, and information resources must be made available to provide basic support for curricular and educational offerings and to enhance student learning.

3-6-703. Function. The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students should discover information in a variety of formats with an appropriately supporting information technology infrastructure.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, ~~as appropriate,~~ information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to ~~make~~ enhance the effectiveness of the educational programs effective.

3-7-703. Function. The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students demonstrate the

ability to define problems, access, evaluate, and analyze a variety of resources, and use retrieved information ethically.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, ~~as appropriate,~~ information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to ~~make~~ enhance the effectiveness of the educational programs ~~effective~~.

3-3-404. Use and Accessibility. In evaluating the use of library resources by students, consideration shall be given to accessibility and to methods used by the faculty to encourage the use of these resources by students. Records of physical and/or online circulation and inventory shall be current and accurate.

Physical and/or online library materials and services must be available at times consistent with the typical student's schedule in ~~both day, and evening,~~ and online programs. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. If online resources are utilized, an appropriate number of terminals and/or wireless access shall be provided for student use. Interlibrary agreements are not substitutes for an institution's library, but rather a means to supplement the institution's holdings in limited areas. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students.

3-4-404, 3-5-404, 3-6-704, 3-7-704. Use and Accessibility. The faculty should inspire, motivate, and direct student usage of the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online resources including full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online resources including full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in ~~both day, and evening,~~ and online programs. If online or computer based resources are ~~computer software~~ is utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the nature of the participating library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online resources including full-text reference materials appropriate for the offerings of the institution.

3-3-405. Holdings. The institution shall have available and easily accessible standard physical and/or online reference works, professional journals, and current periodicals appropriate to the curriculum. Consideration also

shall be given to supplementary library resources contracted by the institution and online resources available to its student body.

3-4-405, 3-5-405. Holdings. A collegiate library shall contain up-to-date physical and/or online resources including full-text titles appropriate for the size of the institution and the breadth of and enrollment in its educational programs. The library collection shall include holdings on the Humanities, Arts, Social Sciences, and Sciences, including mathematics; magazines and essential professional journals and periodicals; ~~and, when appropriate, online data networks and retrieval systems, CD-ROMs, and interactive research systems~~ that support all of the course offerings of the institution.

3-6-705. Holdings. The library shall support the academic programs and the literacy, intellectual, and cultural development of students, faculty, and staff; shall provide current and appropriate physical and/or online, full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; ~~shall provide, when appropriate, on-line data networks and retrieval systems, CD-ROMs, and interactive research systems;~~ and shall be capable of supporting an understanding of the methods and principles of scholarly research and how to use information ethically and/or scholarly research at the graduate level.

3-7-705. Holdings. The library shall support the academic programs and the intellectual and cultural development of students, faculty, and staff; shall provide current and appropriate physical, digital, and/or online full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; ~~shall provide, when appropriate, physical and/or on line, full text data networks and retrieval systems, CD-ROMs, and interactive research systems;~~ and shall be capable of supporting scholarly research at the ~~graduate~~ doctoral level.

3-4-401, 3-5-401. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one who holds a bachelor's or master's degree in library or information science or a comparable program, or state certification to work as a librarian, where applicable, or, for foreign institutions, who holds a bachelor's or master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE) or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

During library hours that are scheduled and posted, there shall be a trained individual on-site who is assigned to oversee and to supervise the library and to assist students with library and information services. This individual shall be competent and technologically literate to use and to aid in the use of the online and computer based library technologies and resources.

3-6-701, 3-7-701. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one with special qualifications to aid students in research and who holds a M.L.S. degree or the equivalent, or, for foreign institutions, who holds a master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE) or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in annual documented professional growth activities.

There shall be a professionally trained individual on duty for sufficient hours, as published by the institution, to support the programs and to assist students with library functions and research. This individual shall be competent both to use and to aid in the use of the physical, computer based, digital and online library technologies and resources.

Appendix H- Principles and Requirements for Nontraditional Education

Resources and Equipment

(b) The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If the majority of a student's classes are online, these resources must include at a minimum access to a virtual library collection of program-related books, journals, and periodicals, and access to virtual library and information technology services.

OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Ramirez moved to accept **option 2** as amended

SECONDED: Commissioner Edwards moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting

If applicable:

AMENDMENT: Commissioner [Last Name] proposed the following amendment to option [X]:
[Amendment]

MOVED: Commissioner [Last Name] moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner [Last Name] moved to second the motion

COMMITTEE: EEE/8.16/3

DATE: August 18, 2016

SUBJECT: **Faculty Field Preparation**

STAFF: Dr. Terron King

ISSUE

The following proposed revisions to the Accreditation Criteria for Faculty Field Preparation are being recommended:

- Revision of dated fields of preparation for faculty to provide membership with current examples of field preparation.
- Revision of language to replace “academic term” to address institutions offering modules within an academic term.

OVERVIEW

Faculty sections of the Accreditation Criteria were one of the focus areas of ACICS’ 2014 Systematic Review. This item was discussed during the 2015 Council meetings and staff was directed to bring it back to the February 2016 Policy Meeting for further discussion.

CRITERIA

3-2-102. Field Preparation. Assignments requiring more than three preparations in different fields (e.g., allied health, business, criminal justice ~~secretarial studies, business administration, data processing~~) shall not be given to an instructor at any given time ~~during one academic term~~.

OPTIONS

1. Consider for proposed policy change the abovementioned language for consideration in August 2016.
2. Make no changes.

RECOMMENDATION: Option 1

MOVED: Commissioner Edwards moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner Thomas moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting]

If applicable:

AMENDMENT: Commissioner [Last Name] proposed the following amendment to option [X]:
[Amendment]

MOVED: Commissioner [Last Name] moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner [Last Name] moved to second the motion

COMMITTEE: EEE/8.16/4

DATE: August 18, 2016

SUBJECT: Workshop Attendance Timeframe

STAFF: Ms. Perliter Walters-Gilliam/Ms. Katie Morrison

ISSUE

There is currently a restriction of the timeframe for which attendance at a workshop will be accepted during the evaluation cycle.

OVERVIEW

The intent of this requirement is to ensure that the membership, for each reevaluation cycle, is adequately informed on policy and procedural changes that may affect the review. Historically, the “self-study” was interpreted as the application for a new grant. However, this has since been revised and updated to include the submission of a number of documents at different times up until the actual visit.

Further, recognizing the unpredictability of personnel change, attendance at a workshop up until the visit itself has been accepted. Further, if this requirement was not met, a finding would be issued and attendance after the fact would be needed. This conflicts with the original intent of the workshop attendance. Both policy and procedural changes may be necessary to resolve the ongoing confusion.

This item was moved from the April 2016 to August 2016 meeting agenda.

CRITERIA

2-1-100 – Accreditation Workshop Requirements

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials self-study. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, and representatives of centrally controlled institutions are required to attend. Currently accredited centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.

OPTIONS

5. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
6. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
7. Recommend a different approach to policy issue as stated below:
8. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Thomas moved to accept option 1 as proposed.

SECONDED: Commissioner Edwards moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting

If applicable:

AMENDMENT: Commissioner [Last Name] proposed the following amendment to option [X]:
[Amendment]

MOVED: Commissioner [Last Name] moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner [Last Name] moved to second the motion

COMMITTEE: EEE/8.16/5

DATE: August 18, 2016

SUBJECT: Transfer of Credit (TC) & Admission of International Students /
Catalog Requirements for Disclosure of TC Policies and Agreements

STAFF: Ms. Perliter Walters-Gilliam/Ms. Katie Morrison and Ms. Niana Moore

ISSUE

- 1) The evaluation and acceptance of transfer of credit must only be from accredited institutions or those recognized as institutions of higher education (international). This is currently not clear in the language and neither is the expectation that foreign transcripts must be evaluated for equivalency prior to accepting said credits. The Criteria also does not identify provisions in place to ensure that the transcripts of international students seeking admission indicate the equivalent of graduation from high school.
- 2) There have been questions as to whether campuses should be required to disclose their transfer of credit policy, articulation agreements, and contracts or agreements in their catalog.

OVERVIEW

- 1) With the increase and sophistication of diploma mills, it is important that the Council communicates its emphasis on academic quality via the expectations of academic coursework being considered for transfer into one of its institutions. Implicitly, the campus should conduct its own assessment of the validity of coursework already completed for alignment with its own program outcomes, and the equivalency of foreign credentials with high school graduation for the admission of international students. However, with additional clarity in the language, all institutions, including those not currently accredited, will be informed of this explicit requirement. This item was moved from the April 2016 to August 2016 meeting agenda.
- 2) Operationally, it is often difficult to determine whether an institution must have an item noted within its catalog when the requirement simply states that these policies or procedures are to be made public. In order to provide clarification, the recommendation is to explicitly state that these particular items must be included in a campus' catalog, and such information listed in Appendix C. The proposed revision of criteria in regards to this item was accepted for consideration in August by the BPC committee at the April meeting, and has been mingled with the proposed criteria revision for item (1), as they both affect Section 3-1-413.

CRITERIA

3-1-411. Admissions. The admissions policy shall conform to the institution's mission, shall be publicly stated and shall be administered as written. The following minimums apply:

- (a) The requirements for students admitted to programs leading to a certificate, diploma or degree shall include graduation from high school or its equivalent, or demonstration of the student's ability to complete the program under the ability-to-benefit classification as specified under standard 3-1-303(b) and (c), as provided for by governing laws. Foreign transcripts of international students seeking admission must be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to validate equivalency with graduation from high school and eligibility to enter college or university in the United States.
- (b) It is the responsibility of the institution to maintain student records which reflect the requirements for admission of all students.

- (c) Institutions are not precluded from admitting, under different requirements, students who are beyond the age of compulsory school attendance or who may be otherwise specifically circumstanced, such as:
- (i) having financial sponsorship through contractual agreements with public or private organizations
 - (ii) having identifiable needs requiring remedial instruction as a supplement to the regular curriculums
 - (iii) participating in innovative postsecondary programs specially described to ACICS; or
 - (iv) being enrolled in individual courses not leading to an academic credential.

3-1-413. *Transfer of Credit.* An institution shall evaluate and consider awarding proper academic credit for credits earned only at institutions that are either accredited by agencies recognized by the United States Department of Education, or recognized by the respective government as institutions of higher education, for internationally-based institutions. The institution shall establish and adhere to a systematic method for evaluating and awarding academic credit for those courses that satisfy current program course requirements, including an evaluation of all foreign transcripts by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES), prior to the evaluation and award. Written policies and procedures must clearly outline the process by which transfer of academic credit is awarded. The institution shall ~~make-~~ publicly disclose in its catalog its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and if applicable, a list of institutions with which the institution has established articulation agreements.

In addition, the institution must ~~provide notification to students as to~~ disclose in its catalog these articulation agreements and the transferability of the credits in the programs that are offered.

Appendix C:

Add the following items under “At a minimum, the catalog must contain the following items”:

- A statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and, if applicable, a list of institutions with which the institution has establish articulation agreements (See Section 3-1-413).
- A statement on the transferability of the credits in the programs that are offered (See Section 3-1-413).
- A description of the contracts or agreements and the services to be provided, if the institution has entered into an agreement with an accredited institution, an agreement with an unaccredited institution, or an international partnership agreement (See Sections 2-2-504, 2-2-505, and 2-2-507 for additional information).

OPTIONS

1. Vote to approve the proposed policy presented above and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Edwards moved to accept option 1 as proposed

SECONDED: Commissioner Ramirez moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting

If applicable:

AMENDMENT: Commissioner [Last Name] proposed the following amendment to option [X]:
[Amendment]

MOVED: Commissioner [Last Name] moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner [Last Name] moved to second the motion

COMMITTEE: EEE/8.16/6

DATE: August 18, 2016

SUBJECT: Glossary Definition of Externship

STAFF: Ms. Perliter Walters-Gilliam/Ms. Katie Morrison

ISSUE

There is a need to clarify the expectation of the supervision of faculty of the externship course and not the development of the agreement

OVERVIEW

In an attempt to clarify its intent that the externship course be supervised by a faculty member (and not staff), the Council inadvertently made a change that reads as though the faculty should supervise the agreement and not the experience. This item was moved from the April 2016 to August 2016 meeting agenda.

CRITERIA

Externship. A supervised-practical experience, under the supervision of a faculty member, that is the application of previously studied theory. ~~Under the supervision of a faculty member, a~~ A written agreement shall be

developed that outlines the arrangement between the institution and the externship site, including specific learning objectives, course requirements, and evaluation criteria.

OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.

2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:

3. Recommend a different approach to policy issue as stated below:

4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Edwards moved to accept option 1 as proposed

SECONDED: Commissioner Blake moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting

If applicable:

AMENDMENT: Commissioner [Last Name] proposed the following amendment to option [X]:
[Amendment]

MOVED: Commissioner [Last Name] moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner [Last Name] moved to second the motion

COMMITTEE: EEE/8.16/7

DATE: August 2, 2016

SUBJECT: Mission Statement

STAFF: Ms. Katie Morrison

ISSUE

Institutional missions have been presented for review and approval with objectives as part of the mission statement versus separating out the objectives or specifically stating the objectives.

OVERVIEW

This item was moved to the EEE committee agenda (from IEC) after the April 2016 meeting. The Council reviewed the current criteria at the April meeting to determine if revision would be required to satisfy its intent for the structure and function of a mission statement and objectives, and voted to accept the following revised language.

CRITERIA

3-1-100 – Mission: Purpose and Objectives

Every institution must have a mission which is its specific purpose for existing. The mission must include a mission statement and a set of objectives which together accomplish the purpose of the institution. ~~This mission, together with a set of objectives to accomplish it, must be summarized in a mission statement.~~ The objectives should be devoted substantially to career-related education and should be reasonable for the program of instruction, mode of delivery, and facilities of the institution.

Institutions may exhibit a variety of missions, ranging from those which have a singleness of purpose to those which are multi-purpose.

OPTIONS

1. Vote to approve the proposed policy presented above and publish it in the Memorandum to the Field.
 2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
 3. Recommend a different approach to policy issue as stated below:
 4. Remove from further consideration.
-

RECOMMENDATION: Option 1

MOVED: Commissioner Blake moved to accept option 1 as proposed

SECONDED: Commissioner Edwards moved to second the motion

ABSTENTION: *If applicable* Commissioner [Last Name] abstained from the discussion and voting]

If applicable:

AMENDMENT: Commissioner [Last Name] proposed the following amendment to option [X]:
[Amendment]

MOVED: Commissioner [Last Name] moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner [Last Name] moved to second the motion

COMMITTEE: EEE/8.16/8

DATE: August 18, 2016

SUBJECT: **Learning Site Definition**

STAFF: Ms. Karly Zeigler

ISSUE

Learning sites with 50% or greater of a program and located in different marketing areas, impacts the ability of ACICS and the school to adequately report student outcomes from that specific location.

OVERVIEW

The current definition of a learning site does not restrict distance from the managing campus or the percent of a program to be offered at the learning site. Currently learning sites have been approved in states separate and apart from the managing campus with a full program of study and administrative staff services provided via online methods.

Accountability: Is there sufficient accountability of student achievement and financial outcomes when students of programs that are offered at a learning site are rolled-up into the managing campuses rates?

Expectations: Are member institution's meeting residential student expectations if the support services are offered via online or remotely through a kiosk format? Can expectations be met if member institutions are required to fully disclose how each administrative support role would be made available to a prospect student prior to enrollment and in the catalog?

CRITERIA

State current *Accreditation Criteria* with track changes or edits made by underlining new content and strikethrough of content that would be deleted.

1-3-103. Learning Site. A learning site is a classroom extension of a main ~~campus~~ or branch campus that is ~~apart from the managing location~~ within five miles of the managing campus; ~~offers less than 50% of a program of study;~~ and maintains academic quality by ~~is capable of providing~~ providing sufficient academic and administrative oversight ~~providing and~~ access to all student services and instructional resources; ~~and maintaining required to academic quality.~~ Learning sites that are greater than five ~~miles~~ miles from the managing campus and offer student

transportation to the managing campus; or are used for delivery of distance education activity or collaborative arrangements with other entities for specific on-site educational activity must be approved by the Council on a case-by-case basis and are subject to a quality assurance visit as specified by the Council. All learning sites are subject to an onsite evaluation visit during the managing campus renewal of accreditation evaluation visit.

OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Ramirez moved to accept option [X] as [proposed or as amended]

SECONDED: Commissioner Edwards moved to second the motion

ABSTENTION: *If applicable* Commissioner Jones abstained from the discussion and voting]

Commissioner Blake motioned for adjournment which was seconded by Commissioner Edwards. The Committee session adjourned at 5:35 PM.

FINANCIAL REVIEW COMMITTEE MINUTES

Tuesday, August 2, 2016

1:00 PM – 4:00 PM

Committee Members

Mr. John Euliano, Chair

Mr. Richard Bennett

Ms. Julie Blake

Dr. Fardad Fateri

Dr. Lawrence Leak

Mr. Roger Swartzwelder

Commissioners

Mr. Jay Fund

Staff Liaisons

Ms. Katy Fisher – Primary Liaison

Mr. Quentin Dean – Secondary Liaison

Mr. Jeff Olszewski – VP Liaison

Others

Mr. Ian Harazduk

Ms. Anne Bennett

I.

CALL TO

ORDER

Chair Euliano called the meeting to order at 1:01pm on Tuesday, August 2, 2016.

II.

OLD

BUSINESS

A. Consent Agenda for Institutions Directed to Submit Quarterly Financial Reports

1. (10128) Bryan University, Topeka, KS – 0 points
2. (10306) Daymar College, Owensboro, KY – 2 points
3. (10469) Duluth Business University, Duluth, MN – 1 point
4. (11200) Eagle Gate College, Murray, UT – 0 points
5. *(10190) EDIC College, Caguas, PR – 3 points
6. *(10602) Empire College, Santa Rosa, CA – 1 point
7. (10431) International College of the Cayman Islands – 1 point
8. (10845) Key College, Dania Beach, FL – 1 point
9. (10950) Lincoln Technical Institute, Edison, NJ – 1 point
10. (171290) Niels Brock Copenhagen Business College, Denmark – 1 point
11. (12651) Pioneer Pacific College, Wilsonville, OR – 1 point
12. (23874) University of Antelope Valley, Lancaster, CA – 1 point

The mission of the Financial Review Committee ("FRC") is to monitor the financial stability of accredited institutions in order to ensure they maintain sufficient financial resources to deliver a quality education to their students.

MOTION: Accept Consent Agenda and direct institutions #2, 7, 8, and 9 to continue on Quarterly Financial Reporting

MOVED: Bennett

SECONDED: Leak

ACTION: Approved

MOTION: After discussion, direct institutions #3, 5, and 6 to continue on Quarterly Financial Reporting

MOVED: Euliano

SECONDED: Fateri

ACTION: Approved

MOTION: After discussion, remove institutions #1, 10, 11, and 12 from financial reporting

MOVED: Swartzwelder
SECONDED: Bennett
ACTION: Approved

MOTION: After discussion, remove institution #4 from financial reporting
MOVED: Swartzwelder
SECONDED: Leak
RECUSED: Blake
ACTION: Approved

B. Consent Agenda for Institutions Directed to Submit Financial Improvement Plans

1. (73857) Bay Area College of Nursing, Inc., Palo Alto, CA – 3 points
2. (12400) Colorado Heights University, Denver, CO – 0 points
3. (40730) Missouri College, Brentwood, MO – 0 points
4. (11332) Ridley-Lowell Business & Technical Institute, Binghamton, NY – 3 points
5. (11303) Ridley-Lowell Business & Technical Institute, New London, CT – 1 point
6. (10357) Salter College, West Boylston, MA – 0 points
7. (10657) Southern Technical College, Fort Myers, FL – 1 point
8. (20720) Southern Technical College, Orlando, FL – 2 points

MOTION: Accept Consent Agenda and direct institutions #1, 2, 3, 4, 5, 7, and 8 to continue on Financial Improvement Plan reporting
MOVED: Swartzwelder
SECONDED: Leak
ABSTAINED: Bennett
ACTION: Approved

MOTION: After discussion, remove institution #6 from financial reporting
MOVED: Blake
SECONDED: Bennett
ACTION: Approved

C. Institutions Directed to Submit Financial Improvement Plans

1. (19459) Brooks Institute, Ventura, CA – 5 points
2. (22465) Jose Maria Vargas University, Pembroke Pines, FL – 6 points
3. *(11096) Taylor Business Institute, Chicago, IL – 5 points

MOTION: Direct institutions to continue on Financial Improvement Plan reporting
MOVED: Euliano
SECONDED: Blake
ACTION: Approved

D. Institutions Subject to Change in Review Status

Institutions directed to Continue on Quarterly Financial Reporting

1. (28284) SAE Institute of Technology, Los Angeles, CA – 8 points
2. *(32108) SAE Institute of Technology, N. Miami Beach, FL – 0 points
3. (245680) SAE Institute of Technology, Nashville, TN – 0 points

Institutions directed to Continue on Financial Improvement Plan reporting

1. (20292) California International Business University, San Diego, CA – 13 points
2. (10934) Fortis Institute, Erie, PA – 1 point
3. (16005) Fortis College, Orange Park, FL – 1 point
4. (10770) Fortis College, Norfolk, VA – 4 points
5. (11328) New York Institute of English and Business, New York, NY – 4 points
6. (22447) Pinchot University, Seattle, WA – 10 points
7. (28864) Tribeca Flashpoint College, Chicago, IL – 7 points

Institutions directed to submit a Financial Improvement Plan (previously on Quarterly Financial Reporting)

1. *(16303) MDT College of Health and Science, Highland Heights, OH – 4 points – request additional information with regard to quarterly reports in comparison to the audited financial statements.
2. (11105) National Latino Education Institute, Chicago, IL – 6 points

Institutions directed to submit a Financial Improvement Plan (previously directed to Show-Cause)

1. (27446) Broadview University, West Jordan, UT – 4 points
2. (70534) Pittsburgh Career Institute, Pittsburgh, PA – 12 points

Institutions removed from Financial Reporting

1. (60173) Bay Area Medical Academy, San Francisco, CA – 0 points
2. (40343) Charter College, Canyon Country, CA – CLOSED
3. (10355) Instituto de Banca y Comercio, Hato Rey, PR – 1 point
4. (27636) Millennia Atlantic University, Doral, FL – 0 points
5. (10647) Schiller International University, Largo, FL – 0 points
6. (23864) Southern States University, San Diego, CA – 0 points

7. +*(11180) Wright Career College, Overland Park, KS – CLOSED

MOTION: Accept directives in Item D. above
MOVED: Euliano
SECONDED: Leak
ACTION: Approved

Institutions directed to show cause for financial instability

1. *(15728) Bristol University, Anaheim, CA – Financial Show-Cause directed in 08/15, Accreditation denied 03/18/16

MOTION: Direct Bristol University to show cause at the December 2016 meeting of the Council
MOVED: Swartzwelder
SECONDED: Bennett
ACTION: Approved

2. (21231) Medtech College, Indianapolis, IN – 7 points

MOTION: Direct Medtech College to show cause at the December 2016 meeting of the Council
MOVED: Swartzwelder
SECONDED: Leak
ACTION: Approved

3. (33239) Radians College, Washington, DC – 0 points

MOTION: Direct Radians College to show cause at the December 2016 meeting of the Council
MOVED: Swartzwelder
SECONDED: Leak
ACTION: Approved

Career Education Corporation (QFR directed in 04/16)

1. +(48705) Le Cordon Bleu College of Culinary Arts, Scottsdale, AZ – 4 points
2. +(19019) Le Cordon Bleu College of Culinary Arts, Pasadena, CA – 7 points
3. +(48280) Le Cordon Bleu College of Culinary Arts, San Francisco, CA – 4 points
4. +(38375) Le Cordon Bleu College of Culinary Arts, Portland, OR – 1 points
5. +(21352) Le Cordon Bleu College of Culinary Arts, Austin, TX – 2 points

Career Education Corporation (CQFR directed in 04/16)

6. +(10798) SBI Campus-An Affiliate of Sanford-Brown, Melville, NY – 13 points
7. +(15768) Sanford-Brown Institute, Jacksonville, FL – 13 points
8. +(11161) Sanford-Brown College, Tampa, FL – 7 points
9. +(20950) Sanford-Brown College, Atlanta, GA – 13 points
10. +(20968) Sanford-Brown College, Dallas, TX – 7 points
11. +(11132) Sanford-Brown College-Chicago, Chicago, IL – 8 points
12. +(70523) Sanford-Brown College, Mendota Heights, MN – 8 points

MOTION: Direct institutions continue on Quarterly Financial reporting and request additional information with regard to a potential loss of Title IV funds
MOVED: Euliano
SECONDED: Leak
ACTION: Approved

Financial Show-Cause Directive Hearings

1. (27446) Broadview University, West Jordan, UT – 4 points

The hearing panel recommends vacating the financial show-cause directive, placing the institution on compliance warning and continuing the financial reporting at the Financial Improvement Plan level.

Delta Career Education Corporation

1. (11194) McCann School of Business and Technology, Pottsville, PA – 3 points
2. (12392) Tucson College, Tucson, AZ – 16 points
3. (114473) Berks Technical Institute, Wyomissing, PA – 1 point
4. (10911) Miller-Motte Technical College, Clarksville, TN – 0 points
5. (10317) Miller-Motte Technical College, Lynchburg, VA – 0 points

The hearing panel recommends vacating the financial show-cause directive and placing the institution on financial reporting at the Financial Improvement Plan level.

Education Management Corporation

1. +(32159) The Art Institute of York – Pennsylvania, York, PA – 1 point

2. (16231) The Art Institute of Fort Lauderdale, Fort Lauderdale, FL – 0 points
3. (10751) The Art Institutes International Minnesota, Minneapolis, MN – 10 points
4. (16235) Art Institute of New York City, New York, NY – 7 points
5. (16228) Art Institute of Phoenix, Phoenix, AZ – 3 points

The hearing panel recommends continuing the financial show-cause directive and placing the institution on probation.

1. (70534) Pittsburgh Career Institute, Pittsburgh, PA – 12 points

The hearing panel recommends vacating the financial show-cause directive and placing the institution on financial reporting at the Financial Improvement Plan level.

Zenith Education Group, Inc.

1. (11177) Everest Institute, Pittsburgh, PA – 19 points
2. (10219) Everest College, Colorado Springs, CO – 13 points
3. (10748) Everest College, Springfield, MO – 14 points
4. (11101) Everest College, Thornton, CO – 16 points
5. (11314) Everest College, Newport News, VA – 16 points
6. +(24720) Everest College, Seattle, WA – 16 points
7. (11333) Everest College, Henderson, NV – 14 points
8. +(10678) Everest College, Portland, OR – 16 points
9. +(10564) Everest College, Bremerton, WA – 14 points
10. (10679) Everest University, Orlando, FL – 16 points

The hearing panel recommends continuing the financial show-cause directive and placing the institution on probation.

E. Financial Adverse Information Update

Staff provided an update on the financial adverse report and will provide further updates at the next meeting.

III. NEW BUSINESS

A. Consent Agenda for Institutions Directed to Submit Quarterly Financial Reports

1. (235912) Brightwood College, Dayton, OH – 1 point
2. (170949) Brightwood College, Broomall, PA – 1 point
3. (10164) Brightwood College, Houston, TX – 1 point
4. (10418) Coleman University, San Diego, CA – 3 points
5. (20271) Court Reporting Institute of St. Louis, Clayton, MO – 3 points
6. (73849) EMSTA College, Santee, CA – 2 points
7. (44818) Felbry College – School of Nursing, Columbus, OH – 3 points
8. (10898) Globe University, Woodbury, MN – 1 point
9. (10399) Metro Business College, Cape Girardeau, MO – 3 points
10. (11103) Minnesota School of Business, Richfield, MN – 1 point
11. (11116) Prince Institute – Southeast, Elmhurst, IL – 3 points
12. (10292) Stone Academy, West Haven, CT – 1 point

MOTION: Accept Consent Agenda and direct institutions #5-12 to submit Quarterly Financial Reports

MOVED: Leak

SECONDED: Fateri

ACTION: Approved

MOTION: After discussion, take no action on institutions #1-3

MOVED: Bennett

SECONDED: Blake

RECUSED: Swartzwelder

ACTION: Approved

MOTION: After discussion, direct institution #4 to submit a Quarterly Financial Report

MOVED: Euliano

SECONDED: Bennett

ABSTAINED: Swartzwelder

ACTION: Approved

B. Institutions Subject to Review due to triggers on AFR and/or Audited Financial Statements

1. (21741) American National University, Indianapolis, IN – 3 points
2. (10278) American National University, Salem, VA – 4 points
3. (10683) National College, Nashville, TN – 4 points
4. (10740) Cambria-Rowe Business College, Johnstown, PA – 16 points
5. (11150) Florida Career College – Miami, Miami, FL – 4 points
6. (15661) Spencerian College, Lexington, KY – 7 points
7. (15803) Sullivan College of Technology and Design, Louisville, KY – 3 points

MOTION: Direct institutions #1-4 to submit Quarterly Financial Reports
MOVED: Blake
SECONDED: Leak
ACTION: Approved

MOTION: Direct institution #5 to submit Quarterly Financial Reports
MOVED: Leak
SECONDED: Blake
RECUSED: Fateri
ACTION: Approved

MOTION: Direct institutions #6 and 7 to submit a Financial Improvement Plan
MOVED: Blake
SECONDED: Leak
ACTION: Approved

C. Change of Ownership/Control

1. (22447) Pinchot University, Seattle, WA (Ownership)

No action was taken on these institutions as not all the required information was submitted for review by the FRC.

D. Financial Adverse Information

Staff to provide update on the adverse report at next meeting.

E. Policy Discussion Items

1. FRC 08.16-01 Require submission of Title IV compliance audit annually

ISSUE

As indicated in ACICS's response to the Department ASL Analyst's draft staff report on June 3, 2016, ACICS indicated that it enhanced its review of an institution's compliance with Title IV regulations by reviewing the annual compliance audit and determining whether these actions need to be reviewed by the At-Risk Institution Group (ARIG), as well as conveyed to the Council for accreditation decision purposes. This requires modification to the *Accreditation Criteria*.

OVERVIEW

Compliance issues derived from the administration of federal student aid by member schools is an important aspect of the ACICS program of review and creates the need for the Council to review member institutions' adherence to Title IV compliance requirements in between the routine renewal of accreditation process. An institution that participates in any Title IV, HEA program must at least annually have an independent auditor conduct a compliance audit of its administration of that program. ACICS would require this compliance audit to be submitted at the same time the institution submits its annual financial statement audit. Staff will review the audit and report any adverse findings to the ARIG for consideration.

CRITERIA

2-1-803. Compliance Audits and Audited Financial Statements. Title IV compliance audits and Audited financial statements, certified by an independent certified public accountant, are essential instruments in the determination by ACICS of an institution's compliance with Title IV requirements and financial stability. All Institutions are required to submit audited financial statements within 180 days of the end of their fiscal year. All institutions that participate with Title IV are required to submit the compliance audit within 180 days of the end of their fiscal year.

MOTION: Approve the proposed policy with amendments and publish it in the Memorandum to the Field
MOVED: Bennett
SECONDED: Blake
ACTION: Approved

2. Financial Review Policies – Altman Z-Score

After discussion, staff was directed to apply the Altman Z-Score to institutions with varying levels of financial risk for a three year period and bring this information to the FRC at the December 2016 meeting.

3. Special FRC meeting in September to allow for ample time to review June Submissions

After discussion, staff was directed to bring a detailed plan to the December meeting of the Council that specifies what institutions would be reviewed at the August meeting and September meeting.

IV. ADJOURNMENT

Chair Euliano 3:56pm on Tuesday, August 2, 2016.

**INSTITUTIONAL EFFECTIVENESS COMMITTEE
AGENDA**

**Monday, August 1, 2016
2:00 PM - 5:00 PM**

Committee Members

Ms. Michelle Edwards, Chair
Dr. Adriene Hobdy
Dr. Deborah Jones
Mr. Luis Llerena
Dr. Rafael Ramirez Rivera (absent)
Dr. Ruth Shafer

Staff Liaisons

Mr. Ian Harazduk – Primary Liaison
Mr. Chad Hartman – Secondary Liaison

Other

Commissioner Jay Fund
Ms. Anne Bennett
Ms. LaToya Boyd
Ms. Jan Chambers
Mr. Steven Gelfound
Ms. Terrasia Harris
Dr. Terron King
Ms. Cathy Kouko
Ms. Linda Lundberg
Ms. Niana Moore
Ms. Katie Morrison
Ms. Samantha Shellum
Ms. Perliter Walters-Gilliam
Mr. Maurice Wadlington
Mr. Roger Williams
Ms. Karly Zeigler

I. CALL TO ORDER

Chair Edwards called the meeting to order at 2:04pm on Monday, August 1, 2016.

II. OLD BUSINESS

Effectiveness Plan IEC/8.16/1

Campus
Walters-Gilliam

ISSUE

The current criteria regarding the CEP include policies and procedures, as well as examples, which create confusion in the field concerning the expectations and interpretation of the language, and lack much needed guidance to emphasize the value of the CEP for members' daily operations and evaluation of their own effectiveness.

OVERVIEW

Over the past few years, extensive research was conducted and discussion had which led to several rounds of changes to clarify the composition and elements of the CEP, the first of which being the revision of the definition of *Student Learning Outcomes* in the Glossary. The second round of changes went into effect on July 1, 2016, adding the *level of student satisfaction* as a required element of the CEP; deleting *graduation rate* as a required element but keeping it, in addition to *cohort default rates* and *matrices of financial stability*, as a recommended area for evaluation; and revising all language to remove references to centrally controlled institutions, institutional effectiveness and Institutional Effectiveness Plans (IEP), in order to place the focus on campus-level effectiveness. At the April 2016 meeting, the Council voted to consider for proposed policy change the addition of a supplementary Appendix K on the Requirements and Guidelines for the CEP, and simplification of criteria for the CEP in order to outline the ACICS policy and refer to Appendix K for more explicit guidelines. Since the April meeting, the staff has added additional verbiage under item 6. Student Learning Outcomes (SLOs) to indicate that licensure and certification pass rates, if applicable, are a required student learning outcome. This language is noted between asterisks (*).

CRITERIA

For clarity and to minimize confusion, the current criteria, effective as of July 1, 2016, is below with proposed changes, and the changes and addition of Appendix K, in final form, are provided as an attachment (Attachment A) given the extensive revisions being proposed.

3-1-110 – CAMPUS EFFECTIVENESS

An important indication of the overall effectiveness of an ACICS-accredited institution is the degree to which it meets the mission, objectives, and educational goals it has identified.~~its own predetermined educational outcomes.~~ Each ~~campus of an ACICS-accredited~~ main and branch campus institution,~~consistent with its mission,~~ shall develop and implement a written Campus Effectiveness Plan (CEP) that is consistent with its mission and objectives. The CEP shall ~~identify~~ identify how a campus~~it~~ plans to assess and continuously improve its overall educational operations, programs and processes, and how it plans that addresses its ability to meet the educational and occupational objectives of its programs, taking into consideration its review of all critical organizational functions such as admissions, recruitment, financial aid, and student services. ~~In this document, each campus should attempt to incorporate short-term objectives to be accomplished in order to achieve the mission of the institution as it applies to the campus and its future goals.~~

For the Campus Effectiveness Plan, the following elements, at a minimum, shall be evaluated and reported for achievement of outcomes, at both the campus and program levels:

1. retention rate,

2. placement rate,
3. the level of student satisfaction,
4. the level of graduate satisfaction,
5. the level of employer satisfaction, and
6. student learning outcomes.

Campuses are encouraged to include additional elements in their plans, such as graduation rates, cohort default rates, and matrices of financial stability, which are relevant to improving their overall effectiveness.

3-1-111. *Development of the Campus Effectiveness Plan.* The effectiveness plan for eEach campus shall be described in a written CEP document that complies with Appendix K, “Requirements and Guidelines for the have on file a-Campus Effectiveness Plan (CEP).”-A main and its branches may share aspects of an CEP, such as the mission, but each main and branch campus is expected to have its own-plan for effectiveness that describes the characteristics of the programs offered and of the student-population, describes what types of data will be used for assessment, identifies outcomes, and states how continuous improvement will be made to improve or enhance outcomes at the campus.

For the Campus Effectiveness Plan, the following six elements, at a minimum, will be evaluated for campus institutional effectiveness:-

1. student retention rates;-
2. placement rates;-
3. level of student satisfaction;-
4. level of graduate satisfaction;-
5. level of employer satisfaction;- and
6. student learning outcomes.

In compiling the data needed to assess the six elements, each campus shall identify and describe how the data were collected, the rationale for using each type of data, a summary and analysis of the data collected, and an explanation of how the data have been used to improve educational processes. Baseline data must be identified for each of the six elements.-

For example, the data needed to demonstrate student learning outcomes includes baseline data and data to support that student learning has occurred. Examples of data may include, but are not limited to,- course grades, GPA, CGPA, pre and post tests, entrance assessments, portfolios, standardized tests, professional licensure examinations, and other measures of skill and competency attainment. Placement data should not be used exclusively to validate student learning outcomes.-

Each campus shall publish annual placement and retention goals. In formulating these goals, the campus shall take into account the retention and placement rates from the previous three Campus Accountability Reports and the specific activities that will be undertaken to meet those goals. The activities must demonstrate the campus’ ability to maintain or improve retention and placement outcomes each year.-

Campuses are encouraged to include additional elements in their plans, such as graduation rates, cohort default rates, and matrices of financial stability, which are relevant to improving their overall effectiveness.

3-1-112. *Implementation and Monitoring of the Campus Effectiveness Plan.* EachAll campuses shall establish a process for developing, reviewing, and monitoring the Campus Effectiveness Plan (CEP). Each campus shall document that the specific activities listed in the plan are carried out and that periodic

~~progress reports, are completed at least biannually, related to completion of activities and changes in data and information for each of the elements identified in the CEP are prepared, to ensure that the plan's activities are implemented. Appropriate individuals should be assigned responsibility for implementing and monitoring the Campus Effectiveness Plans.~~

3-1-113. Evaluation of the Campus Effectiveness Plan. ~~Each~~All campuses shall evaluate the CEP~~plan,~~ its goals, and ~~the effectiveness of activities completed at least annually. The annual e~~Evaluation will involve comparison of outcomes with requires the determination of initial baseline rates and goals for each of the elements and a measurement of results after completion of planned activities have occurred. All campuses should adjust their goals accordingly as a result of an evaluation of the Campus Effectiveness Plans. Data for historical outcomes shall be maintained and included in the report to provide a basis for evaluating the achievement of goals for the various elements of operations and campus and program effectiveness over time.

OPTIONS

5. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
6. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:

The amended version moved by the IEC Committee is included below as Attachment A. The amended language discussed during the August 2016 meeting is underlined or ~~struck through~~.
7. Recommend a different approach to policy issue as stated below:
8. Remove from further consideration.

RECOMMENDATION: Option 2

MOVED: Commissioner Shafter moved to accept option 2 as amended

SECONDED: Commissioner Llerena moved to second the motion

ABSTENTION: None

ATTACHMENT A: PROPOSED REVISION TO CEP CRITERIA

3-1-110 – CAMPUS EFFECTIVENESS

An important indication of the overall effectiveness of an ACICS-accredited campus is the degree to which it meets the mission, objectives, and educational goals it has identified. Each ACICS-accredited main and branch campus shall develop and implement a written Campus Effectiveness Plan (CEP) that is consistent with its mission and objectives. The CEP shall identify how a campus plans to assess and continuously improve its overall educational operations and how it plans to meet the educational and occupational objectives of its programs, taking into consideration its review of all critical organizational functions such as admissions, recruitment, financial aid, and student services.

For the Campus Effectiveness Plan, the following elements, at a minimum, shall be evaluated and reported for achievement of outcomes, at both the campus and program levels:

1. retention rate,
2. placement rate,
3. graduation rates,
4. the level of student satisfaction,
5. the level of graduate satisfaction,
6. the level of employer satisfaction,
7. student learning outcomes, and
8. cohort default rates, if applicable

~~Campuses are encouraged to include additional elements in their plans, such as graduation rates, cohort default rates, and matrices of financial stability, which are relevant to improving their overall effectiveness.~~

3-1-111. *Development of the Campus Effectiveness Plan.* The effectiveness plan for each campus shall be described in a written CEP document that complies with Appendix K, “Requirements and Guidelines for the Campus Effectiveness Plan (CEP).”

3-1-112. *Implementation and Monitoring of the Campus Effectiveness Plan.* Each campus shall establish a process for developing, reviewing, and monitoring the Campus Effectiveness Plan (CEP). Each campus shall document that progress reports, completed at least biannually, related to completion of activities and changes in data and information for each of the elements identified in the CEP are prepared.

3-1-113. *Evaluation of the Campus Effectiveness Plan.* Each campus shall evaluate the CEP, its goals, and the effectiveness of activities completed at least annually. The annual evaluation will involve comparison of outcomes with baseline rates and goals for each of the elements measured after completion of planned activities. Data for historical outcomes shall be maintained and included in the report to provide a basis for evaluating the achievement of goals for the various elements of operations and campus and program effectiveness over time.

APPENDIX K Requirements and Guidelines for the Campus Effectiveness Plan (CEP)

This Appendix identifies the Council's requirements for the content of a written Campus Effectiveness Plan (CEP) document. The CEP should provide information about the campus and how it measures and evaluates key elements of its operations in order to continuously improve its overall educational operations and meets its mission and objectives. The Council requires each campus to have a current CEP available that meets the requirements identified in this Appendix.

A main and branch campus may use similar language, format, and general content in CEPs, where appropriate. However, the CEP for each main and branch campus must also include information and data specific to its own campus including the characteristics and demographics of the current student population; the number of students enrolled in each program; campus and program retention and placement rates; results of surveys to determine current student, graduate, and employer satisfaction; student learning outcomes; and any additional elements used to evaluate effectiveness, such as graduation rates, cohort default rates, and matrices of financial stability.

For those campuses offering programs in non-traditional modes of delivery, the distance education plan must be integrated into the CEP and the elements evaluated to include the effect of the modality on overall outcomes. Further, the campus must also incorporate its assessment of faculty satisfaction into its plan.

A. Evaluation of Elements in the Campus Effectiveness Plan (CEP)

The CEP shall, at minimum and at both the campus and program levels, report outcomes for each of the elements listed below. For each element, at the campus and program levels, as appropriate, baseline rates and levels for comparison and goals for the current evaluation period must be identified. A summary and analysis of previous performance, a rationale for the baseline rates and levels, goals, and a listing of activities that will be undertaken to achieve the goals must also be included.

1. Retention rates.
2. Placement rates.

Student retention and graduate placement rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period. The data and information reported for retention and placement rates must demonstrate that the campus is maintaining or improving performance each year or, if that is not the case, then the campus must provide an explanation of mitigating circumstances affecting improved outcomes. In accordance with Section 2-1-809, a specific plan to improve the retention and/or placement rate(s) for each program not meeting current Council standards for retention and/or placement must be included within the CEP.

3. Graduation Rates

Graduation rates are based on scheduled to graduate cohort for each program offered at a campus. The graduation rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period.

4. The level of current student satisfaction.
5. The level of graduate satisfaction.

6. The level of employer satisfaction.

The level of satisfaction for each of the three elements identified above shall be determined and reported at least twice a year. For each of these three elements, the CEP must identify and describe what types of data were used to determine the level of satisfaction, how they were collected, and the target group's response rate. Graduate satisfaction should be evaluated no sooner than 30 days following and within 6 months after graduation and include both placed and non-placed graduates.

7. Student learning outcomes (SLOs).

Measuring and evaluating achievement of the SLOs are among the most important activities available to validate and confirm overall program and campus effectiveness. SLOs should be appropriately selected to reflect the nature of the academic programs offered and must include direct assessments but may also include indirect measurements (see Glossary definitions of **Direct** and **Indirect Assessment**). For campuses that offer programs for which licensure or certification is required to practice in the specific career field, pass rates shall be evaluated as a required student learning outcome.

8. Cohort Default Rates

For those campuses that participate in the Title IV program, the campus must review its cohort default rates. The cohort default rates received from the Department of Education shall be included in the CEP for the most recent three years' worth of data, or, if less than three years' worth of data is available, data for at least one reporting period. Any campus that is required to submit an improvement plan in accordance with Section 2-1-810 must include the plan within the CEP.

B. Implementation and Monitoring of the Campus Effectiveness Plan (CEP)

Each campus shall systematically maintain progress reports on a periodic basis as defined by the campus but no less than two times during the CEP year that document completion of activities and changes in data and information for each of the CEP elements. Activities, as described in the reports, are to be specific and measurable.

In addition to the periodic progress reports, each campus is required to conduct a comprehensive evaluation of its plan at the end of the CEP year and to incorporate the results of that evaluation into the next year's CEP, as appropriate. The next year's CEP should contain a narrative section describing or explaining the consideration and, if applicable, the incorporation of the previous year's outcomes in the formulation of the new document.

NEW BUSINESS

1. Due Process Chart/Appendix for CAR Guidelines **IEC/8.16/2**

Harazduk

ISSUE

In the report for the DOE (See Section 602.20(a)), the staff analyst stated that ACICS was not following DOE requirements because ACICS "deferred" institutions that were below the Council standard for student achievement in "Year 1." In addition, the analyst determined that ACICS did not have a clear

and explicit procedure for initiating immediate adverse action against an institution that had poor student achievement outcomes.

OVERVIEW

In order to clarify any confusion that resulted from the previous Due Process table, the revised table is proposed for the 2016 CAR review cycle.

DUE PROCESS FOR STUDENT ACHIEVEMENT STANDARDS		
<i>Effective 2016</i>		
	Campus and/or Program Status	Council Directed Actions*
Year-1 <u>Current Submission</u>	Campus-Level: <u>Reporting</u>	<ul style="list-style-type: none"> • Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) • Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 • <u>Attendance at ACICS' Retention and Placement Workshop</u>
	Program-Level: <u>Reporting</u>	<ul style="list-style-type: none"> • Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP)
Year-2 <u>Following Year 1</u>	Campus-Level: Compliance Warning	<ul style="list-style-type: none"> • Continue Improvement Plan and inclusion into the CEP following evaluation, analysis, evidence of monitoring and revision, if needed. • Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 • Prepare a contingency plan for campus closing for submission upon request
	Program-Level: Compliance Warning	<ul style="list-style-type: none"> • Continue Improvement Plan and inclusion into the CEP following evaluation, analysis, evidence of monitoring and revision, if needed.
Year-3 <u>Following Year 2</u>	Campus-Level: Withdrawal by Suspension	<ul style="list-style-type: none"> • Implement an ACICS approved Teach-out Plan and Agreement, if applicable • Appealable to the Review Board of Appeals
	Program Level: Termination of Program	<ul style="list-style-type: none"> • Submit a Program Termination Plan for ACICS approval

** It is understood that the Council has the right to take an adverse action or a show-cause directive (probation order) at its discretion if an institution is deemed significantly out of compliance with little chance of coming into compliance within in a reasonable period of time.*

ACICS has defined the procedures for the clause asterisked above, which are as follows:

- If a campus/program is seriously below (Council judgement) standard in their current submission, then the Council will take an Immediate Adverse Action.
- If a campus/program is below 50% in their current submission, then the Council will issue a Probation Order (formerly show-cause)
- If a campus/program is below 50% following Year 1, the Council will take an Adverse Action

Reporting – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates below 60%, it is considered on student achievement review and reporting. The campus and/or program is required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must include the required elements and may be reviewed during any on-site evaluation visit. In addition, for those campuses below 60%, they must attend an ACICS Retention and/or Placement Workshop. If the campus/program has significantly poor student achievement outcomes, then the Council may initiate an immediate adverse action or issue a probation order.

Compliance Warning – The second consecutive year a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates below standards, it will be considered out of compliance and placed on Compliance Warning status. A campus and/or program on Compliance Warning status is required to evaluate, analyze and, if necessary, revise the Improvement Plan implemented while on student achievement review. Council reserves the right to request submission of the evaluation and analysis of the Improvement Plan for Council review. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves into compliance with the applicable standard.

Withdrawal by Suspension or Termination of a Program – If a campus reports three consecutive years of below-standard retention or placement rates, the Council will issue a withdrawal by suspension action. The Council will require the campus to submit it an ACICS-approved teach-out plan. If a program reports three consecutive years of below-standard retention, placement, or licensure pass rates, it will be required to cease enrollment and terminate the program of study.

Probation – The Council reserves the right to issue a probation order against any campus that is materially below the Council standard. This is defined as below 50% for any student achievement indicator in their current submission.

The Council may also issue a probation order for a particular program at a campus. This is defined as below 50% in their current submission for any student achievement indicator.

Immediate Adverse Action – The Council reserves the right to take immediate adverse action if the campus is significantly below the Council standard in its current submission year. An adverse action for a campus is a withdrawal by suspension and for a program is termination of the program.

Established time frames for Compliance – When a campus and or program is determined by the Council to be out of compliance (either on Probation following their current submission or below the standard following Year 1), it

will be required to bring itself into compliance within one year. Failure to bring the campus and/or program into compliance with retention, placement and/or program licensure pass rates within one year will result in implementation of an approved teach-out plan. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance.

Data Collection and Verification – ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council calculates campus and program-level retention and placement rates and program-level licensure examination pass rates where licensure is required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30 and placement is accepted through November 1st of the CAR reporting year.

CRITERIA

Appendix L

OPTIONS

1. Vote to approve the proposed policy presented below and publish it in the Memorandum to the Field.
2. Vote to approve the proposed policy with amendments shown below and publish it in the Memorandum to the Field:
3. Recommend a different approach to policy issue as stated below:
4. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Llerena moved to accept option 1 as proposed

SECONDED: Commissioner Hobdy moved to second the motion

ABSTENTION: None

APPENDIX L Student Achievement Standards and Campus Accountability Reports

INTRODUCTION

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the *Accreditation Criteria* requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under **Section 2-1-801**. Appendix L provides an overview of the Council's student achievement standards and Council actions that will be taken if the student achievement data show out of compliance with these standards.

STUDENT ACHIEVEMENT STANDARDS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure examinations where applicable, and find employment related to their fields.

Campus- Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard*	Benchmark**
Student Retention Rate	60%	70%
Employment or Placement Rate	60%	70%
Program- Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard*	Benchmark**
Student Retention Rate		
<ul style="list-style-type: none"> • Program length equal to or less than one (1) year • Program length equal to or more than one (1) year 	60%	70%
	60%	65%
Employment or Placement Rate	60%	70%
Licensure Pass Rates, where applicable***	60%	70%

* A campus and/or program is determined to be on reporting if they are below the standard for their current submission. However, the Council has the right to take an adverse action or a probation order at its discretion if an institution is deemed significantly out of compliance with little chance of coming into compliance within in a reasonable period of time.

**A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan. Rates falling below Minimum Standard are considered out of compliance and subject to Council action.

***Licensure pass rates apply where a licensure is required for employment. The program is also required to meet applicable licensure agency standards if higher rates are required.

DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY

As required under **Standard 2-1-801** each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before **November 1** annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1st of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness (See **Standard 3-1-203**). In addition to the Council review of data on an annual basis, CAR data is reviewed and verified during an on-site evaluation visit.

STUDENT ACHIEVEMENT MONITORING AND COUNCIL ACTIONS

The Council monitors student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take immediate adverse action once a campus and/or program found out of compliance. The Council will follow the guidelines listed below:

Year Reporting	Campus and/or	Council Directed Actions*
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	Program Status	
Current Submission	Campus-Level: Reporting	<ul style="list-style-type: none"> • Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) • Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 • Attendance at ACICS' Retention and Placement Workshop
	Program-Level: Reporting	<ul style="list-style-type: none"> • Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP)
Following Year 1	Campus-Level: Compliance Warning	<ul style="list-style-type: none"> • Continue Improvement Plan and inclusion into the CEP following evaluation, analysis, evidence of monitoring and revision, if needed. • Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 • Prepare a contingency plan for campus closing for submission upon request
	Program-Level: Compliance Warning	<ul style="list-style-type: none"> • Continue Improvement Plan and inclusion into the CEP following evaluation, analysis, evidence of monitoring and revision, if needed.
Following Year 2	Campus-Level: Withdrawal by Suspension	<ul style="list-style-type: none"> • Implement an ACICS approved Teach-out Plan and Agreement, if applicable • Appealable to the Review Board of Appeals
	Program Level: Termination of Program	<ul style="list-style-type: none"> • Submit a Program Termination Plan for ACICS approval

** It is understood that the Council has the right to take an adverse action or a probation order at its discretion if an institution is deemed significantly out of compliance with little chance of coming into compliance within in a reasonable period of time.*

Reporting – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates below 60%, it is considered on student achievement review and reporting. The campus and/or program is required to show improvement and

must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must include the required elements and may be reviewed during any on-site evaluation visit. In addition, for those campuses below 60%, they must attend an ACICS Retention and/or Placement Workshop.

Compliance Warning – The second consecutive year a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates below standards, it will be placed on Compliance Warning status and found to be out of compliance. A campus and/or program on Compliance Warning status is required to evaluate, analyze and, if necessary, revise the Improvement Plan implemented while on student achievement review. Council reserves the right to request submission of the evaluation and analysis of the Improvement Plan for Council review. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves into compliance with the applicable standard. If the campus/program has significantly poor student achievement outcomes, then the Council may initiate an immediate adverse action or issue a probation order.

Withdrawal by Suspension or Termination of a Program – If a campus reports three consecutive years of below-standard retention or placement rates, the Council will issue a withdrawal by suspension action. The Council will require the campus to submit it an ACICS-approved teach-out plan. If a program reports three consecutive years of below-standard retention, placement, or licensure pass rates, it will be required to cease enrollment and terminate the program of study.

Probation – The Council reserves the right to issue a probation order against any campus that is materially below the Council standard. (This is defined as below 50% for any student achievement indicator in their current submission).

The Council may also issue a probation order for a particular program at a campus. (This is defined as below 50% in their current submission for any student achievement indicator).

Immediate Adverse Action – The Council reserves the right to take immediate adverse action if the campus is significantly below the Council standard in its current submission year. An adverse action for a campus is a withdrawal by suspension and for a program is termination of the program.

Established time frames for Compliance – When a campus and or program is determined by the Council to be out of compliance (either on Probation following their current submission or below the standard following Year 1), it will be required to bring itself into compliance within one year. Failure to bring the campus and/or program into compliance with retention, placement and/or program licensure pass rates within one year will result in implementation of an approved teach-out plan. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance.

Data Collection and Verification – ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council calculates campus and program-level retention and placement rates and program-level licensure examination pass rates where licensure is required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30 and placement is accepted through November 1st of the CAR reporting year.

Please refer to Campus Accountability Report (CAR) Guidelines for details online submission of the annual report, instructions, types of information collected, and calculation formulas.

ISSUE

The Council initiated a new standard in order to provide explicit requirements for its expectations as it relates to the accuracy and verifiability of data collected and submitted by institutions to the Council in fulfillment of its accountability requirements.

In addition, as a procedural measure, on-site evaluation visits in the Spring 2016 cycle included an evaluator with the primary role of verifying reported institutional data (specifically placement data from the most recently submitted CAR).

OVERVIEWData Integrity Standard

The data integrity standard now requires institutions to reflect an accurate and verifiable portrayal of their institutional performance. Therefore, if the Council determines that an institution is not meeting this standard (i.e. has inaccurate placement calculations, then the team would have a finding of Section 3-1-203).

Data Integrity Review

The new standard also states that all data reported to ACICS is subject to review for integrity, accuracy, and completeness. The way ACICS had been reviewing data was through the on-site evaluation visit process, through the PVP for randomly-assigned or selected institutions, and through third-party verification for selected institutions.

ACICS most recently included a data integrity reviewer (DIR) whose primary purpose was to attempt to contact and verify 100% of the placed graduates and review and verify 100% of placement waiver documentation. As a result of this new initiative, there were considerably more findings related to placement classification and verification of the CAR. Nonetheless, ACICS looks to continue to improve this process and conducted a survey of all DIRs and Chairs following this cycle. The feedback received was that this endeavor was time-consuming and there may be improvements such as receiving more recent data and conducting some or all of this work at the office.

Therefore, the proposed plan for the Fall 2016 cycle is to require all institutions receiving a full-team evaluation visit to provide a completed PVP spreadsheet for the months January – June 2016. Then, ACICS will attempt to verify these placements through the automated process of sending e-mails to students and graduates. The team will then receive a report of the graduates who were verified, those who did not reply, (and any in between). The DIR on the visit will then contact the graduates and/or employers that did not respond and attempt to verify those placements.

(Note: As stated in the 2017 CAR Enhancements discussion, this procedure can move forward in the 2017 calendar year and beyond, since ACICS will be requiring all institutions to complete the PVP process).

The DIR will also conduct a full review of licensure pass rates and ensure that the institution is collecting and submitting accurate data to ACICS.

CRITERIA

3-1-203. *Data Integrity.*

All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness.

OPTIONS

1. Continue with the data integrity approach as currently formulated
2. Continue with the approach with the following amendments as shown below:

RECOMMENDATION: Option 1

MOVED: Commissioner Jones moved to accept option 1 as proposed

SECONDED: Commissioner Llerena moved to second the motion

ABSTENTION: None

3. Licensure Exam Pass Rates **IEC/8.16/4** King

ISSUE

The DOE Analyst's report highlighted ACICS' need to address how well graduates of its institutions succeed on licensing exams that are required for employment.

OVERVIEW

2016 CAR-Procedural Changes

1. Institutions will be asked to report the last three years of licensure pass rates published by the licensure agency for any program that requires licensure for employment.
2. Student Achievement sanctions licensure pass rates will be taken on the most current licensure pass rate published by the licensure agency.
3. All institutions offering programs that require licensure for employment will be required to upload documentation published by the licensure agency of its cumulative pass rate during the current reporting period.

2016 and 2017 CAR-Procedural Changes (on-going)

1. Based on information presented in the 2015 and 2016 CAR licensure pass rates, AID has and will continue to compile a list of licensure agencies by state. AID/IT staff has and will reach out to these agencies to discuss the software needed to retrieve institutional licensure pass rates directly from their databases. When ACICS receives licensure pass rate data directly from the licensure body, then it will verify the data from the institution and the licensure body to ensure they match.

Note: As mentioned in the Data Integrity Standard outline, the Data Integrity Reviewer (DIR) beginning in the Fall 2016 will review and verify licensure pass rates during on-site evaluation visits.

CRITERIA

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure pass rates, if applicable. When this review indicates that student achievement is below Council standards, the Council will require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP). If the Council determines the institution is out of compliance with the Council's requirement for student achievement, the Council will issue a compliance warning and require the institution to demonstrate compliance with the next year's CAR submission. This time frame may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., improvement in retention, placement, or licensure pass rates..

OPTIONS

1. Consider the procedural changes outlined for the 2016 and 2017 CAR.
2. Make no changes.

RECOMMENDATION: Option 1

MOVED: Commissioner Llerena moved to accept option 1 as proposed

SECONDED: Commissioner Shafer moved to second the motion

ABSTENTION: None

4. 2016 and 2017 CAR Enhancements (Graduation Rates) **IEC/8.16/5** Harazduk

ISSUE

ACICS needs to enhance its Campus Accountability Report twofold: 1) systematically verify placement information provided by institutions and 2) collect information that would provide graduation rates for programs and campuses. The Council acted in April to move forward with the process of creating a graduation rate.

OVERVIEW

Placement Verification

ACICS's ability to consistency verify the placement information provided by institutions has undergone serious criticism from other oversight agencies included the Department of Education. As one means to enhance its placement verification process, ACICS plans to scale up its current PVP process to all campuses for all months of the 2017 CAR.

This process would require each campus to submit the PVP spreadsheet 30 days following the end of month (i.e. July placements would be submitted at the end of August, etc.). Once the campus submits the form, ACICS will act to verify the placement through its process to send notifications to each graduate

and the employer. This will significantly increase the amount of placements that are verified and ensure this verification occurs in a timely manner. In addition, to ensure that ACICS verifies all placements, the institution will not be able to classify a graduate as placed unless they have been verified through the PVP process.

Graduation Rates

The 2016 CAR will include a few new fields in order to capture a “schedule to graduate cohort” per program. The new fields will include the cohort start date (month and year), the scheduled to graduate cohort (month and year), and any revision to the scheduled to graduate cohort date due to leaves of absence or transfers. With this new field, ACICS can produce a schedule to graduate rate for each of these monthly cohorts, which after 12 months of data will lead to a comprehensive rate for that program over that period of time. ACICS tested the validity of this data with data from a school and was able to come out with consistent result for programs over a 12-month time period.

ACICS also must determine how to utilize graduation rate data once compiled. Since this is a student achievement indicator that ACICS has not utilized before, the recommendation is that we borrow the compliance standards of an agency with similar programs (i.e. ACCSC) until enough data is collected for ACICS to have its own measurable standard.

CRITERIA

N/A

OPTIONS

1. Vote to implement the 2016 and 2017 CAR Enhancements and publish for informational purposes in the Memorandum to the Field.
2. Recommend a different approach to policy issue as stated below:
3. Remove from further consideration.

RECOMMENDATION: Option 1

MOVED: Commissioner Llerena moved to accept option 1 as proposed

SECONDED: Commissioner Hobby moved to second the motion

ABSTENTION: None

5. Request to Submit New Program Applications While on Compliance Warning

Shellum

- Dewey University, Carolina, PR IEC/8.16/6

ISSUE

Should the Council permit **Dewey University, Carolina, PR** to submit a new program application while on probation due to extremely low placement rates reported in the 2014 and 2015 CAR?

OVERVIEW

A request was submitted by **Dewey University, Carolina, PR** for a waiver to Section 2-2-120 of the *Accreditation Criteria* to allow the campus to submit a new program application for a **Preschool Education bachelor's program**. The campus has reported a placement rate of **51%** on the 2015 CAR and a placement rate of **55%** on the 2014 CAR. The campus is currently on probation.

Currently, the institution is approved to offer **Nursing Sciences, Office Systems Administration, Office Systems Administration, Plumbing, Practical Nursing, Refrigeration And Air Conditioning Technician, Preschool Education, Refrigeration And Air Conditioning Technology, Web Technology And Mobile Application Design, Marine Mechanical Technology Service And Maintenance Of Small Vessels, Management Information Systems, Information Technology Specialty, Health Services Management In Medical Billing And Coding, Health Information Technology, Electricity Technology And Photovoltaic System, Electricity And Photovoltaic Systems Technology, Computer Specialist, Computer Information Technology, Child Care And Development, Business Administration In Accounting, Business Administration In Accounting, Automotive Technician Specialized In Transmissions, Automotive Technician Specialized In Motorcycles And Related Vehicles, Automotive Technician Specialized In Engine Performance, Automotive Technician, Automotive Mechanic, Automotive Electronic Specialist, Administrative Assistant, Advanced Cosmetology**. The institution is approved to offer programs at the **bachelor's degree level**.

CRITERIA

Section 2-2-120. INITIATION AND EVALUATION OF CHANGES WITHIN CURRENT SCOPE

All programs and delivery methods must be within the institution's scope of accreditation and receive ACICS approval before recruiting or enrolling students. Programs offered by the institution are appropriately evaluated during the institution's initial grant of accreditation and renewal of accreditation evaluations.

The initiation of a new program, or a change in the overall objective of a currently approved program or in the credential level of an existing program, requires approval prior to implementation. The initiation of courses and programs offered via an online modality also requires approval prior to implementation. An application form and any additional documentation specified by ACICS must be submitted. Programs that have not started within one year of the proposed start date and programs that have been inactive for at least three years must be surrendered as defined in Section 2-2-503, Termination of Programs. Institutions or campuses must have demonstrated compliance with ACICS standards at a lower credential level before requesting a new program at a higher credential level.

Any institution or campus on interim reporting to the Financial Review Committee may be required to obtain prior permission from ACICS for the initiation of any new program. Any institution or campus under a compliance warning, a show-cause directive, a negative action, or in a probation status must obtain prior approval to apply for a new program. Additionally, any institution or campus subject to a comprehensive on-site evaluation as a result of extensive substantive changes must obtain prior permission from ACICS for the initiation of any new program.

OPTIONS:

1. Grant the institution's request for permission to submit a Preschool Education bachelor's degree new program application.
2. Deny the institution's request for permission to submit a Preschool Education bachelor's degree new program application.

RECOMMENDATION: Option 1

MOVED: Commissioner Llerena moved to accept option 2 as proposed

SECONDED: Commissioner Hobby moved to second the motion

ABSTENTION: None

- American University In Bosnia and Herzegovina **IEC/8.16/7**

ISSUE

Should the Council permit **American University in Bosnia and Herzegovina, Tuzla** to submit **two** new program applications while on compliance warning due to low placement rates reported in the 2014 and 2015 CAR?

OVERVIEW

A request was submitted by **American University in Bosnia and Herzegovina, Tuzla** for a waiver to Section 2-2-120 of the *Accreditation Criteria* to allow the campus to submit two new program applications for bachelor's degrees in **International Relations and Diplomacy** and **International Sales and Marketing**. The campus has reported a placement rate of **48%** on the 2015 CAR and a placement rate of **55%** on the 2014 CAR.

Currently, the institution is approved to offer **Business Administration, Cyber Security, Graphic Design and Multimedia, Information Technology, International and European Public Law, International Finance, Law, and National and International Security**. The institution is approved to offer programs at the **Master's Degree level**.

CRITERIA

Section 2-2-120 INITIATION AND EVALUATION OF CHANGES WITHIN CURRENT SCOPE

All programs and delivery methods must be within the institution's scope of accreditation and receive ACICS approval before recruiting or enrolling students. Programs offered by the institution are appropriately evaluated during the institution's initial grant of accreditation and renewal of accreditation evaluations.

The initiation of a new program, or a change in the overall objective of a currently approved program or in the credential level of an existing program, requires approval prior to implementation. The initiation

of courses and programs offered via an online modality also requires approval prior to implementation. An application form and any additional documentation specified by ACICS must be submitted. Programs that have not started within one year of the proposed start date and programs that have been inactive for at least three years must be surrendered as defined in Section 2-2-503, Termination of Programs. Institutions or campuses must have demonstrated compliance with ACICS standards at a lower credential level before requesting a new program at a higher credential level.

Any institution or campus on interim reporting to the Financial Review Committee may be required to obtain prior permission from ACICS for the initiation of any new program. Any institution or campus under a compliance warning, a show-cause directive, a negative action, or in a probation status must obtain prior approval to apply for a new program. Additionally, any institution or campus subject to a comprehensive on-site evaluation as a result of extensive substantive changes must obtain prior permission from ACICS for the initiation of any new program.

OPTIONS:

1. Grant the institution's request for permission to submit an International Relations and Diplomacy bachelor's degree new program application and an International Sales and Marketing bachelor's degree new program application.
2. Deny the institution's request for permission to submit an International Relations and Diplomacy bachelor's degree new program application and an International Sales and Marketing bachelor's degree new program application.

RECOMMENDATION: Option 2

MOVED: Commissioner Llerena moved to accept option 2 as proposed

SECONDED: Commissioner Jones moved to second the motion

ABSTENTION: None

III. FUTURE AGENDA

1. Discussion on exemption of programs with enrollment of less than 10 students during reporting period.
2. Discussion on whether a bright-line standard is appropriate for licensure examination pass rates.
3. Discussion on maintaining benchmark level for 2017 CAR

IV. ADJOURNMENT

Commissioner Llerena made a motion to conclude the meeting at 4:31pm which was seconded by Commissioner Shafer.

HEARING REPORT

ACICS ID	Class	Campus Name	Recommendation	Council Action	Motion	Second	Opposed	Abstain
00016231	MAIN	Art Institute of Fort Lauderdale, Fort Lauderdale, FL	Probation	Probation	Swartzwelder	Hobdy		
00016235	MAIN	Art Institute of New York City, New York, NY	Probation	Probation	Swartzwelder	Hobdy		
00016228	MAIN	Art Institute of Phoenix, Phoenix, AZ	Probation	Probation	Swartzwelder	Hobdy		
00032159	MAIN	Art Institute of York-Pennsylvania, York, PA	Probation	Probation	Swartzwelder	Hobdy		
00010751	MAIN	Art Institutes International Minnesota, Minneapolis, MN	Probation	Probation	Swartzwelder	Hobdy		
00114473	MAIN	Berks Technical Institute, Wyomissing, PA	Vacate Show Cause	Vacate Show Cause	Fateri	Euliano		Swartzwelder
00015728	MAIN	Bristol University, Anaheim, CA	Show Cause	Show Cause	Euliano	Swartzwelder		
00027446	MAIN	Broadview University-West Jordan, West Jordan, UT	Compliance Warning	Compliance Warning	Thomas	Llerena	Fund	
00016100	MAIN	Everest College, Chesapeake, VA	Probation	Probation	Blake	Edwards		
00010219	MAIN	Everest College, Colorado Springs, CO	Probation	Probation	Blake	Edwards		
00010417	MAIN	Everest College, Everett, WA	Probation	Probation	Blake	Edwards		
00011333	MAIN	Everest College, Henderson, NV	Probation	Probation	Blake	Edwards		
00010678	MAIN	Everest College, Portland, OR	Probation	Probation	Blake	Edwards		
00010748	MAIN	Everest College, Springfield, MO	Probation	Probation	Blake	Edwards		
00011101	MAIN	Everest College, Thornton, CO	Probation	Probation	Blake	Edwards		
00147010	MAIN	Everest College, Woodbridge, VA	Probation	Probation	Blake	Edwards		
00011334	MAIN	Everest University - Tampa, Tampa, FL	Probation	Probation	Blake	Edwards		
00016040	MAIN	ITT Technical Institute, Indianapolis, IN	Show Cause	Show Cause	Edwards	Bennett		
00016074	MAIN	ITT Technical Institute, Spokane Valley, WA	Show Cause	Show Cause	Edwards	Bennett		
00011194	MAIN	McCann School of Business and Technology, Pottsville, PA	Vacate Show Cause	Vacate Show Cause	Fateri	Euliano		Swartzwelder
00021231	MAIN	Medtech College, Indianapolis, IN	Show Cause	Show Cause	Euliano	Swartzwelder		
00010911	MAIN	Miller-Motte Technical College, Clarksville, TN	Vacate Show Cause	Vacate Show Cause	Fateri	Euliano		Swartzwelder
00010317	MAIN	Miller-Motte Technical College, Lynchburg, VA	Vacate Show Cause	Vacate Show Cause	Fateri	Euliano		Swartzwelder
00070534	MAIN	Pittsburgh Career Institute, Pittsburgh, PA	Vacate Show Cause	Vacate Show Cause	Euliano	Hobdy		
00033239	MAIN	Radians College, Washington, DC	Show Cause	Show Cause	Euliano	Swartzwelder		
00012392	MAIN	Tucson College, Tucson, AZ	Vacate Show Cause	Vacate Show Cause	Fateri	Euliano		Swartzwelder

ABSTENTIONS

See Attachment.



MEMORANDUM TO THE FIELD

September 16, 2016

TO: ACICS-Accredited Institutions and Other Interested Parties

FROM Accrediting Council for Independent Colleges and Schools

DATE: September 16, 2016

The Memorandum to the Field contains final criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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1. Final Criteria Revisions (Effective Immediately)

At its August 2016 meeting, the Council reviewed specific sections of the ACICS *Accreditation Criteria* for the purpose of enhancing and fortifying its program of review of colleges and schools offering programs that prepare students for employment in professional, technical and occupational fields. The language contained in the following section reflects content that the Council determined, pursuant to Section 1-1-200(b) of the *Accreditation Criteria*, does not require comment from the field due to the editorial and procedural nature of the changes.

The ACICS *Accreditation Criteria* will be updated to reflect all final criteria revisions effective immediately. To review the revised copy of the *Accreditation Criteria* before July 1, please visit the ACICS website at www.acics.org.>About Us>Publications>Accreditation Criteria.

The following criteria have been accepted by the Council as **final** with an immediate effective date (new language is underlined, ~~deleted language is struck~~).

A. TEACH-OUT REQUIREMENTS

Explanation of Final Changes

The Council included language relative to when an institution is required to submit a teach-out plan, including notification from the Department of Education on actions taken against an institution's participation in the Title IV program, a denial or withdrawal action by ACICS, a notification to cease operations, and notification from the state licensing authority of a revocation action. These requirements were stated previously in ACICS procedural documents, and for purposes of meeting the regulation 34 CFR § 602.24(c)(1), the language has been included in the appropriate section of the Accreditation Criteria.

2-2-303. Teach-out. The Council ~~may direct~~ will require an ~~currently accredited~~ institutions to provide a ~~school-closure~~ teach-out plan in the following instances: ~~or a formal teach-out agreement~~

- (a) The Secretary notifies ACICS that it has initiated an emergency action against an institution or an action to limit, suspend, or terminate participation in Title IV programs, and that a teach-out plan is required
- (b) ACICS acts to deny or withdraw the accreditation of an institution
- (c) The institution notifies ACICS that it intends to cease operations or close a location that provides 100% of at least one program;
- (d) A state licensing or authorizing agency notifies ACICS that an institution's license or legal authorization to provide educational programs has been or will be revoked;
or

ACICS MEMORANDUM TO THE FIELD

September 16, 2016

- (e) A result of adverse information, high cohort default rate(s), low retention and/or placement rate(s), financial instability, or other concerns that may call into question the institution's ability to continue to serve the educational needs and objectives of its students or to continue as an on-going concern.

At the discretion of the Council, the teach-out plan may include a formal teach-out agreement with another institution.

If an institution closes or announces its intent to close, the Council will work to the extent feasible with the U.S. Department of Education and the appropriate state regulatory agencies to ensure that students are given reasonable opportunities to complete their education without additional charge. An institution that closes without completing its contractual training obligations to students must refund all unearned revenue.

Should an institution enter into a teach-out agreement with another accredited institution, the signed agreement must be submitted to and approved by the Council prior to implementation. In addition to general information on the institutions entering into the teach-out agreement, the agreement must demonstrate that:

- (a) students will be provided, without additional charge, all of the instruction promised but not yet provided by the closing institution; and
- (b) the teach-out institution is geographically proximate to the closing institution or otherwise can provide students with reasonable access to its programs and services, and that it has the necessary experience, resources, and support services to provide an educational program that is of acceptable quality and is reasonably similar in content, structure, and scheduling to that provided by the closing institution.

B. GUIDELINES ON NOTIFICATION OF TITLE IV CONCERNS

Explanation of Final Changes

The Council has modified its language related to ACICS' guidelines on notifying the Department of Education when ACICS has reason to believe an institution may be failing to meet its Title IV responsibilities. The revised language more definitively aligns with 34 CFR § 602.27(a)(6) and provides a more definitive process for how and when ACICS will notify the Department of Education in these instances.

Appendix G - Guidelines on Disclosure and Notification

These guidelines are designed to inform institutions of the policies of the Council and to guide staff in disclosing information and providing materials to third parties regarding an institution's accreditation. Many policies are required by federal law and regulation.

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The policies presented below are not intended to cover every situation, and the Council exercises considerable discretion in balancing the need for confidentiality in the accreditation process with the need to disclose information to the public, including students and student applicants, and to other interested third parties, including government agencies. The Council will provide information requested by the U.S. Department of Education that may bear on an institution's compliance with federal student financial aid requirements, including the eligibility of the institution to participate in Title IV programs. Please refer to Title II, Chapter 3 for additional information.

...

4. Through written, established protocols, the Council will directly, and in a timely manner, inform the U.S. Department of Education of any institution which the Council has reason to believe is failing to comply with meet its Title IV law or regulations program responsibilities or is engaged in fraud and abuse, along with the Council's reasons for concern about the institution.

Further, the Council will make such notification if it believes the institution demonstrates systemic noncompliance with respect to use of the Department's definition of credit hour or significant noncompliance regarding conformity with commonly accepted practice in the assignment of credit hours to one or more programs at the institution. The institution will then be given an opportunity to provide evidence demonstrating why it is in compliance with Title IV requirements regarding credit hour assignments.

C. GOOD-CAUSE EXTENSION TIME FRAME

Explanation of Final Changes

The Council has clearly and definitively stated the time frame for determining whether an institution is in full compliance if and when the Council exercises its discretion to allow for a "good-cause extension." The new language states: "In no event will the good-cause extension exceed one year.

Title II, Chapter 3, Council Actions -Introduction

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the Council may take are described in this chapter. Procedures available to institutions to challenge those actions and the maximum time frames for achieving final disposition of those actions by the Council also are explained. There are four general areas of Council

actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

If the Council determines that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed the following:

- (a) twelve months, if the longest program is less than one year in length;
- (b) eighteen months, if the longest program is at least one year, but less than two years in length; and
- (c) two years, if the longest program is at least two years in length.

The above time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in completion or placement rates. In no event will the good-cause extension exceed one year.

2. Proposed Criteria Revisions

At its August 2016 meeting, the Council reviewed specific areas of the *ACICS Accreditation Criteria* outlined in this section and approved the revisions as **proposed** (new language is underlined, ~~deleted language is struck~~). **Public comment on these new revisions is requested through the ACICS Comment Survey explained at the end of the memorandum.** ACICS requests comments and recommendations from a broad cross-section of ACICS stakeholders, including students, faculty, school administrators, policy advocates, and others.

A. COUNCIL ACTIONS/PROBATION STANDARD

Explanation of Proposed Changes

The Council proposes to streamline its current Council action procedures. A number of proposed changes are included within this item, namely, the removal of "admonition" as a formal Council action, removal of a "show-cause directive" and replacement with a "probation order", and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of show-cause and the

supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a “show-cause directive” will be revised with a “probation order.”

2-3-100 – Accreditation Granted

If an institution is found to be in compliance with the *Accreditation Criteria*, ACICS may grant accreditation for a specific period of time from a minimum of one year to a maximum of six years. The length of the grant shall be at the discretion of ACICS. A grant of accreditation for less than six years is not a negative action and, therefore, is not appealable.

The Council will not grant accreditation for a full six-year term if the grant is awarded following any hearing resulting from a previous action to deny accreditation.

~~**2-3-101. Admonition.** The Council may judge an institution to be generally in compliance with the criteria, but it also may wish to call the institution’s attention to one or more deficiencies that are not serious enough to preclude a grant of accreditation but that nonetheless must be corrected. In these cases, the institution will be awarded a grant of accreditation but will be admonished to correct the deficiencies. An admonition is an instruction to an institution either to initiate some prescribed practice or to refrain from some proscribed activity. An admonition does not condition the grant of accreditation, but failure to respond to it could result in a subsequent negative action.~~

2-3-200 – Accreditation Deferred or Conditioned

The Council, upon review of relevant information concerning an institution, may take any of the following actions at any time in accordance with the procedures described, up to and including a final adverse action.

2-3-210. Deferral. When Council determines there is insufficient evidence available to make a decision, they it may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide with sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, “no action at this time” and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on renewal of accreditation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed.

2-3-220. Compliance Warning. When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council ~~will~~ may issue a compliance

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warning. The institution will be provided in writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

The Council may issue a A show-cause directive probation order or a denial action/suspension order ~~may be issued by ACICS~~ as the result of ~~this review~~ reviewing a compliance warning as described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

When the reasons for the compliance warning are satisfied, the action may be lifted either by the President in cases where no evaluation is involved.

2-3-230. Show-Cause Directive. ~~When the Council determines that an institution is not in compliance, and is unlikely to become in compliance, with the *Accreditation Criteria*, the institution will be provided in writing with the areas of noncompliance and will be invited to “show cause” why its accreditation should not be suspended or otherwise conditioned.~~

~~The opportunity to show cause before the Council will be considered to be a hearing as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to final adverse action.~~

~~When the reasons for the show-cause are satisfied, the directive may be lifted by ACICS. All institutions directed by the Council to show-cause why their accreditation should not be suspended or otherwise conditioned will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.~~

2-3-240230. Probation (formerly Show-Cause Directive).

~~Probation is a status that the Council may impose on an institution when it determines that if the institution does not is unable to demonstrate that it consistently materially operates in accordance with the *Accreditation Criteria*. **2-3-241231. Imposition.** The Council will provide the institution with a written summary of the areas of noncompliance, and the institution will be required to provide evidence of The institution will be provided in writing the areas in which the institution did not materially operate in accordance with the *Accreditation Criteria*, will be required to demonstrate corrective action for review by ACICS. Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action. Following receipt of a probation order, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to an adverse action.~~

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The issuance of a probation order may be considered the basis for a hearing, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a probation order by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

2-3-242231. *Result of Probation.* The Council will not accept any applications for new programs or new campuses from any institution on probation unless the institution receives approval in advance to submit such an application.

2-3-243232. *Probation Lifted.* Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show-cause directive has been vacated. (See Title II, Chapter 3, Introduction). If the institution demonstrates that it has addressed the Council's concerns and is operating in compliance with the *Accreditation Criteria*, then the probation may be lifted by ACICS. The Council may also order a special visit at the institution's expense before lifting probation.

2-3-244233. *Notification of Probation.* The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on probation. The institution is required to notify immediately ~~in writing~~ its current and prospective students and the public about its probation status through appropriate means, including posting a prominent notice on its webpage that it has been placed on probation by its accrediting agency.

2-3-300 – Accreditation Denied

...

2-3-400 – Accreditation Withdrawn

...

2-3-403. *Procedural Guarantees for Withdrawal by Suspension.* In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- ~~(a)~~ Opportunity for a hearing before ACICS on all material issues in controversy.
- ~~(b)~~(a) Written prior notice of the proceedings, the charges levied, and the standards by which the institution ultimately is to be judged.
- ~~(c)~~(b) A decision on the record alone and a statement of reasons for the ultimate decision.
- ~~(d)~~(c) A right of appeal as provided in Section 2-3-600.
- ~~(e)~~(d) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

2-3-500 – Council Hearing Procedures

All hearings will be in writing unless the Council exercises its sole discretion to allow a hearing in person before the Council. The following procedures will govern hearings to be held before the Council:

- (a) ~~The request for acceptance of~~ a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the ~~show-cause-directive probation order~~. The request for acceptance of a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the request for acceptance of a hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing, ~~including the dates by which the institution must submit its response to the show-cause directive.~~
- (b) The institution shall have the right to respond with evidence and facts concerning the areas of noncompliance with which it has been charged, to raise all reasonable questions, and to present evidence in opposition to or extenuation of the charges of noncompliance. Such written evidence must be submitted by the date prescribed by the Council unless the institution can show that such information was not available before the submission date and that failure to make a timely submission was outside of the institution's control.
- (c) ~~At the~~ In the event the Council allows a hearing in person, the institution may present only evidence not already considered. The institution may send one or more representatives, including legal or financial counsel, to present its argument in opposition to or extenuation of the Council action. The Council transcribes all such hearings for its records. A copy of the transcript is available to the institution upon request.

2-3-501. Hearing Format. Hearings before the Council resulting from a ~~show-cause directive-probation order~~ and involving areas of noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A hearing panel of at least three commissioners will be designated by the Council to hear the presentation of the institution. The panel will present its findings and its recommended action to the full Council, which will make the final decision ~~in a~~ within the time frames specified in Title II, Chapter 3. not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.

2-3-502. Financial Hearings. All hearings before the Council for financial concerns only will be heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision ~~in a~~ within the time frames specified in Title II, Chapter 3 not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least

~~two years in length from the time the institution was found out of compliance with the Accreditation Criteria.~~

B. CAMPUS EFFECTIVENESS PLAN – APPENDIX K

Explanation of Proposed Changes

The Council has proposed a series of revisions to the Campus Effectiveness Plan (CEP). The changes include the addition of “Appendix K,” which will detail the guidelines and requirements for the CEP, including all evaluation elements and monitoring processes. In addition, the Council proposes adding two more important new measurements, namely, the program- and campus-level graduation rate, and the institutional cohort default rate.

3-1-110 – CAMPUS EFFECTIVENESS

An important indication of the overall effectiveness of an ACICS-accredited institution is the degree to which it meets the mission, objectives, and educational goals it has identified. ~~its own predetermined educational outcomes.~~ Each campus of an ACICS-accredited ~~main and branch campus~~ institution, consistent with its mission, shall develop and implement a written Campus Effectiveness Plan (CEP) that is consistent with its mission and objectives. The CEP shall ~~identify~~ identifies how a campus ~~it~~ plans to assess and continuously improve its overall educational operations ~~programs and processes,~~ and how it plan ~~that~~ addresses its ability to meet the educational and occupational objectives of its programs, taking into consideration its review of all critical organizational functions such as admissions, recruitment, financial aid, and student services. ~~In this document, each campus should attempt to incorporate short-term objectives to be accomplished in order to achieve the mission of the institution as it applies to the campus and its future goals.~~

For the Campus Effectiveness Plan, the following elements, at a minimum, shall be evaluated and reported for achievement of outcomes, at both the campus and program levels:

1. retention rate,
2. placement rate,
3. graduation rate,
4. the level of student satisfaction,
5. the level of graduate satisfaction,
6. the level of employer satisfaction,
7. student learning outcomes, and
8. cohort default rate, if applicable

3-1-111. Development of the Campus Effectiveness Plan. The effectiveness plan for ~~e~~Each campus shall be described in a written CEP document that complies with Appendix K, “Requirements and Guidelines for the ~~have on file a~~ Campus Effectiveness Plan (CEP).” ~~A main and its branches may share aspects of an CEP, such as the mission, but each main and branch campus is expected to have its own plan for effectiveness that~~

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~~describes the characteristics of the programs offered and of the student population, describes what types of data will be used for assessment, identifies outcomes, and states how continuous improvement will be made to improve or enhance outcomes at the campus.~~

~~For the Campus Effectiveness Plan, the following six elements, at a minimum, will be evaluated for campus institutional effectiveness:~~

- ~~1. student retention rates;~~
- ~~2. placement rates;~~
- ~~3. level of student satisfaction;~~
- ~~4. level of graduate satisfaction;~~
- ~~5. level of employer satisfaction; and~~
- ~~6. student learning outcomes.~~

~~In compiling the data needed to assess the six elements, each campus shall identify and describe how the data were collected, the rationale for using each type of data, a summary and analysis of the data collected, and an explanation of how the data have been used to improve educational processes. Baseline data must be identified for each of the six elements.~~

~~For example, the data needed to demonstrate student learning outcomes includes baseline data and data to support that student learning has occurred. Examples of data may include, but are not limited to, course grades, GPA, CGPA, pre- and post-tests, entrance assessments, portfolios, standardized tests, professional licensure examinations, and other measures of skill and competency attainment. Placement data should not be used exclusively to validate student learning outcomes.~~

~~Each campus shall publish annual placement and retention goals. In formulating these goals, the campus shall take into account the retention and placement rates from the previous three Campus Accountability Reports and the specific activities that will be undertaken to meet those goals. The activities must demonstrate the campus' ability to maintain or improve retention and placement outcomes each year.~~

~~Campuses are encouraged to include additional elements in their plans, such as graduation rates, cohort default rates, and matrices of financial stability, which are relevant to improving their overall effectiveness.~~

3-1-112. *Implementation and Monitoring of the Campus Effectiveness Plan.* Each ~~All~~ campuses shall establish a process for regularly and systematically monitoring the Campus Effectiveness Plan (CEP). Each campus shall document that the specific activities listed in the plan are carried out and that periodic progress reports, are completed at least biannually. The progress reports must include the completion of activities and changes in data and information for each of the elements identified in the CEP, to ensure that the plan's activities are implemented. Appropriate individuals should be assigned responsibility for implementing and monitoring the Campus Effectiveness Plans.

3-1-113. Evaluation of the Campus Effectiveness Plan. Each ~~All~~ campuses shall evaluate the CEP ~~plan~~, its goals, and the effectiveness of activities completed at least annually. The annual e ~~valuation~~ will involve comparison of outcomes with requires the determination of initial ~~baseline~~ rates and goals for each of the elements and a measured ~~ment of results~~ after completion of ~~planned activities have occurred~~. All campuses should adjust their goals accordingly as a result of an evaluation of the Campus Effectiveness Plans. Data for historical outcomes shall be maintained and included in the report to provide a basis for evaluating the achievement of goals for the various elements of operations and campus and program effectiveness over time.

APPENDIX K **Requirements and Guidelines for the Campus Effectiveness Plan (CEP)**

This Appendix identifies the Council's requirements for the content of a written Campus Effectiveness Plan (CEP) document. The CEP should provide information about the campus and how it measures and evaluates key elements of its operations in order to continuously improve its overall educational operations and meets its mission and objectives. The Council requires each campus to have a current CEP available that meets the requirements identified in this Appendix.

A main and branch campus may use similar language, format, and general content in CEPs, where appropriate. However, the CEP for each main and branch campus must also include information and data specific to its own campus including the characteristics and demographics of the current student population; the number of students enrolled in each program; campus and program retention and placement rates; results of surveys to determine current student, graduate, and employer satisfaction; student learning outcomes; and any additional elements used to evaluate effectiveness, such as graduation rates, cohort default rates, and matrices of financial stability.

For those campuses offering programs in non-traditional modes of delivery, the plan for this mode of delivery must be integrated into the CEP and the elements evaluated to include the effect of the modality on overall outcomes. Further, the campus must also incorporate its assessment of faculty performance into its plan.

A. Evaluation of Elements in the Campus Effectiveness Plan (CEP)

The CEP shall, at minimum and at both the campus and program levels, report outcomes for each of the elements listed below. For each element, at the campus and program levels, as appropriate, baseline rates and levels for comparison and goals for the current evaluation period must be identified. A summary and analysis of previous performance, a rationale for the baseline rates and levels, goals, and a listing of activities that will be undertaken to achieve the goals must also be included.

1. Retention rates.
2. Placement rates.

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Student retention and graduate placement rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for at least one reporting period. The data and information reported for retention and placement rates must demonstrate that the campus is maintaining or improving performance each year or, if that is not the case, then the campus must provide an explanation of mitigating circumstances affecting improved outcomes. In accordance with Section 2-1-809, a specific plan to improve the retention and/or placement rate(s) for each program not meeting current Council benchmarks or standards for retention and/or placement must be included within the CEP.

3. Graduation Rates

Graduation rates are based on the "scheduled to graduate" cohorts for each program offered at a campus. The graduation rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for a minimum of one reporting period.

4. The level of current student satisfaction.

5. The level of graduate satisfaction.

6. The level of employer satisfaction.

The level of satisfaction for each of the three elements identified above shall be determined and reported at least twice a year. For each of these three elements, the CEP must identify and describe what types of data were used to determine the level of satisfaction, how they were collected, and the target group's response rate. Graduate satisfaction should be evaluated no sooner than 30 days following and within 6 months after graduation and include both placed and non-placed graduates.

7. Student learning outcomes (SLOs).

Measuring and evaluating achievement of the SLOs are among the most important activities available to validate and confirm overall program and campus effectiveness. SLOs should be appropriately selected to reflect the nature of the academic programs offered and must include direct assessments but may also include indirect measurements (see Glossary definitions of **Direct** and **Indirect Assessment**). For campuses that offer programs for which licensure or certification is required to practice in the specific career field, pass rates shall be evaluated as a required student learning outcome.

8. Cohort Default Rates

For those campuses that participate in the Title IV program, the campus must review its cohort default rates. The cohort default rates received from the Department of Education shall be included in the CEP for the most recent three years' worth of data, or, if less than three years' worth of data is available, data for at least one reporting period. Any campus that is required to submit an improvement plan in accordance with Section 2-1-810 must include the plan within the CEP.

B. Implementation and Monitoring of the Campus Effectiveness Plan (CEP)

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Each campus shall systematically prepare progress reports on a periodic basis as defined by the campus but no less than two times during the CEP year that document completion of activities and changes in data and information for each of the CEP elements. Activities, as described in the reports, are to be specific and measurable.

In addition to the periodic progress reports, each campus is required to conduct a comprehensive evaluation of its plan at the end of the CEP year and to incorporate the results of that evaluation into the next year's CEP, as appropriate. The next year's CEP should contain a narrative section describing or explaining the consideration and, if applicable, the incorporation of the previous year's outcomes in the formulation of the new document.

C. CAR PROCEDURES AND GUIDELINES – APPENDIX L

Explanation of Proposed Changes

The Council proposes to include all of the standards related to student achievement and the Campus Accountability Report (CAR) in "Appendix L" of the Accreditation Criteria. The new Appendix includes the current student achievement rates and the applicable monitoring statuses and actions for campuses and programs that are not meeting acceptable student achievement indicators. In the proposed language, the Council more clearly defines the point at which a particular action will be taken, including the issuance of an adverse action, a probation order, a compliance warning, or reporting and restrictions against a campus or program. The Council also proposes revising language in corresponding sections of the Criteria, such as student achievement review and Council actions at the program-level.

If the proposed language is approved, the Council intends to utilize these policies and procedures for data submitted in the 2016 Campus Accountability Report.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and ~~Institutional Accountability Report (IAR)~~ to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure, ~~registration or certification~~ examination pass rates, if applicable. When this review indicates that the achievement of an institution's students is below benchmark ~~weak or deteriorating~~, the Council will place the campus or program on reporting and require the institution to add an improvement plan within its Campus Effectiveness Plan (CEP) ~~and/or Institutional Effectiveness Plan (IEP)~~. If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a compliance warning, a ~~show-cause directive~~ probation order, or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. If the Council deems an institution significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance, then it will take an adverse action. ~~These~~

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~~time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement, or licensure pass rates. Institutions that are required to include a plan of student achievement improvement within their CEPs or that are determined to be out of compliance with the Council's standards for student achievement are considered to be on student achievement review. Those with campus- or institution/program-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.~~

...

2-2-502. Program Probation or Compliance Warning. When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure examination pass rates, the institution will be provided in writing with a probation or compliance warning regarding the alleged deficiency. The probation or warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established timeframe or be taught out and discontinued or otherwise conditioned.

A program probation or compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program probation or compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3 and Appendix L, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503. ~~The time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement or licensure pass rates.~~

A program that is placed on probation status is required to notify immediately in writing its current and prospective students and the public about its probation status through appropriate means.

2-2-503. Termination of Programs. The withdrawal of approval for a program following the issuance of a program compliance warning or a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested publics. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program or who voluntarily terminate an approved program will be directed to submit a program termination plan that conforms to the following requirements. New students may not be enrolled in any program

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which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic progress to complete the program.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only.

To maintain approval, an institution must demonstrate active enrollment in each program of study. If an approved program is inactive for at least ~~three~~ two years, the program will be considered discontinued and will be removed from the institution's list of approved programs. To reinstate the program, the institution must initiate a new program application process. Programs that have not started within one year of the proposed start date will be surrendered. To reinstate the program, the institution must initiate a new program application process. Requests to extend a new program's proposed start date beyond one year of the initial date must be submitted to the President.

...

APPENDIX L Student Achievement Standards and Campus Accountability Reports

INTRODUCTION

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the Accreditation Criteria requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under Section 2-1-801. Appendix L provides an overview of the Council's student achievement standards and Council actions that will be taken if the student achievement data show that a campus or program is out of compliance with these standards.

STUDENT ACHIEVEMENT STANDARDS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure examinations where applicable, and find appropriate employment.

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<u>Campus- Level Student Achievement Elements (Effective 2013 Reporting Year)</u>	<u>Standard</u>	<u>Benchmark*</u>
<u>Retention Rate</u>	<u>60%</u>	<u>70%</u>
<u>Placement Rate</u>	<u>60%</u>	<u>70%</u>
<u>Program- Level Student Achievement Elements (Effective 2013 Reporting Year)</u>	<u>Standard</u>	<u>Benchmark*</u>
<u>Retention Rate</u>		
<ul style="list-style-type: none"> • <u>Program length equal to or less than one (1) year</u> • <u>Program length equal to or more than one (1) year</u> 	<u>60%</u>	<u>70%</u>
	<u>60%</u>	<u>65%</u>
<u>Placement Rate</u>	<u>60%</u>	<u>70%</u>
<u>Licensure Examination Pass Rates, where applicable**</u>	<u>60%</u>	<u>70%</u>

*A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan.

**Licensure examination pass rates apply where a licensure is required for employment. The program is also required to meet applicable licensure agency standards if higher rates are required.

DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY

As required under **Standard 2-1-801** each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before **November 1** annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1st of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness (See **Standard 3-1-203**). In addition to the Council review of data on an annual basis, placement information is reviewed via monthly submissions, and all CAR data is subject to review and verification at any time, including during an on-site evaluation visit.

STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS

The Council reviews student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance. The Council will follow the guidelines listed below:

<u>Year Reporting</u>	<u>Rates</u>	<u>Campus and/or Program Status*</u>	<u>Council Directed Activities</u>
<u>Current Submission</u>	<u>60-70%</u>	<u>Reporting</u>	<ul style="list-style-type: none"> • <u>Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and program-level)</u>

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			<ul style="list-style-type: none"> • <u>Attendance at ACICS' Retention and Placement Workshop (campus-level)</u>
	<u>50-60%</u>	<u>Compliance Warning</u>	<ul style="list-style-type: none"> • <u>Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and program-level)</u> • <u>Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (campus-level)</u>
	<u>Below 50%</u>	<u>Probation</u>	<ul style="list-style-type: none"> • <u>Submit evidence of corrective action to the Council (campus- and program-level)</u> • <u>Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (campus-level)</u> • <u>Notification of its status to its current and prospective students (campus- and program-level)</u>
	<u>*</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (campus- and program-level)</u> • <u>Appealable to the Review Board of Appeals (campus-level)</u> • <u>Submit a Program Termination Plan for ACICS approval (program-level)</u>
<u>Following Year 1</u>	<u>50-60%</u>	<u>Probation</u>	<ul style="list-style-type: none"> • <u>Submit evidence of corrective action to the Council (campus- and program-level)</u> • <u>Notification of its status to its current and prospective students (campus- and program-level)</u> • <u>Attendance at ACICS' Retention and Placement Workshop (campus-level)</u>
	<u>Below 50%</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Teach-out Plan and Agreement, if</u>

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			<p><u>applicable (campus- and program-level)</u></p> <ul style="list-style-type: none"> • <u>Appealable to the Review Board of Appeals (campus-level)</u> • <u>Submit a Program Termination Plan for ACICS approval (program-level)</u>
<u>Following Year 2</u>	<u>Below 60%</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (campus- and program-level)</u> • <u>Appealable to the Review Board of Appeals (campus-level)</u> • <u>Submit a Program Termination Plan for ACICS approval (program-level)</u>

** If the Council deems an institution or an individual program significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action. In the event that the Council finds an institution or an individual program to be out of compliance at a level that, in its judgement, can be remedied in a reasonable period of time, it will take action appropriate to the circumstances such as compliance warning or probation.*

DESCRIPTION OF STUDENT ACHIEVEMENT REVIEW ACTIONS

Immediate Adverse Action – The Council reserves the right to take immediate adverse action if the campus is significantly out of compliance with the Council standards with little or no chance of coming into compliance within the maximum time frame. An adverse action for a campus is a withdrawal by suspension and for a program is termination of the program, except for teach-out purposes for the currently enrolled students.

Probation – The Council will issue a probation order against any campus or program that is materially below the Council standard, as defined as below 50% for any student achievement indicator in its current submission. The probation order is an action by which the Council determines that the campus and/or program is materially out of compliance and submit evidence of corrective action to the Council. In addition, the campus and/or program must provide notification of its status to all current and prospective students. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves into compliance with the applicable standard.

Reporting – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates between 60-70%, it is considered, on student achievement review and reporting. The campus and/or program is

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required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must include the required elements and may be reviewed during any on-site evaluation visit. In addition, those campuses must attend an ACICS Retention and/or Placement Workshop.

Compliance Warning – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure pass rates between 50-60%, the Council will issue a compliance warning and the campus and/or program will be found out of compliance. A campus and/or program on compliance warning is required to evaluate, analyze and, if necessary, revise the Improvement Plan implemented while on student achievement reporting. The Council reserves the right to request submission of the evaluation and analysis of the Improvement Plan for Council review. As a result of being found out of compliance, the campus and/or program must come in to compliance within the time frame specified in Title II, Chapter 3.

Withdrawal by Suspension or Termination of a Program – If a campus does not come into compliance within the time frames specified for compliance warning or probation, then the Council will issue a withdrawal by suspension action. The Council will require the campus to submit an ACICS-approved teach-out plan. If a program does not come into compliance within the time frames specified for compliance warning or probation, it will be required to cease enrollment and terminate the program of study.

Data Collection and Verification – ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council reviews campus and program-level retention and placement rates and program-level licensure examination pass rates where licensure is required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30 and placement is accepted through November 1st of the CAR reporting year.

Please refer to Campus Accountability Report (CAR) Guidelines for details regarding online submission of the annual report, instructions, types of information collected, and calculation formulas.

D. REQUIREMENT FOR TITLE IV COMPLIANCE AUDIT

Explanation of Proposed Changes

The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

2-1-803. Compliance Audits and Audited Financial Statements. Title IV compliance audits and Audited financial statements, certified by an independent certified public

accountant, are essential instruments in the determination by ACICS of an institution's compliance with Title IV requirements and financial stability. All institutions are required to submit audited financial statements within 180 days of the end of their fiscal year. All institutions that participate in the Title IV program are required to submit the compliance audit within 180 days of the end of their fiscal year.

3. Systematic Review – Proposed Criteria Revisions

At its August 2016 meeting, the Council reviewed specific areas of the ACICS *Accreditation Criteria* that had been presented to the Council through its routine systematic review process. The proposed changes are outlined in this section and the Council approved the revisions as **proposed** (new language is underlined, deleted language is struck). **Public comment on these new revisions is requested through the ACICS Comment Survey explained at the end of the memorandum.** ACICS requests comments and recommendations from a broad cross-section of ACICS stakeholders, including students, faculty, school administrators, policy advocates, and others.

A. BASIC RECORDS

Explanation of Proposed Changes

The Council proposes to clarify the language and definitions surrounding record maintenance and protection. The Council proposes updating the language on record protection and requiring institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council proposes more clearly defining student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.

3-1-303. Records.

...

(f) All ~~basic records and reports~~ pertaining to students shall be safely protected. Records shall be stored consistently in a manner that provides protection against misuse, misplacement, damage, destruction, or theft. Acceptable methods of protecting records from theft, fire, water damage, or other possible loss include electronic records management systems and software, appropriately fire-rated file cabinets (that can be and are locked when not being used); a central location such as a vault, the entirety of which is protected; ~~and microfilmed records, computer disk, backup tape,~~ printout records, or other hard copies of records protectively stored off the premises.

(g) Certain basic records shall be maintained by the institution for a specified period of time. The institution shall adopt and publish a policy on the responsibility and authority of the institution to properly maintain and retain such records. At a minimum, the policy should address the following document retention requirements:

1. ~~Transcripts~~ Academic records should ~~shall be kept~~ maintained indefinitely permanently (see *Record, Permanent Academic* in Glossary);
2. ~~Admissions data and other advisement records should~~ shall be kept for at least five years from graduation or the last day date of attendance(see *Record, Admissions and Advisement* in Glossary);
3. Financial aid records shall be maintained according to the record retention policies and guidelines established by the funding source (see *Record, Financial Aid* in Glossary).

The institution shall comply with its published policy on records maintenance and retention.

Glossary of Definitions

Record, Admissions and Advisement. Official documents of admissions data, counseling, and advising. These documents include, but are not limited to, applications for admission or readmission (for matriculates), admission letters, denial and waitlist notifications, aptitude/assessment test scores, military records, degree audit records, transfer credit evaluations, transcripts reflecting degrees earned from other institutions, and counseling and advising correspondence.

Record, Permanent Academic. ~~The~~ Official documents on which is listed the courses attempted, grades and credit earned, and status achieved by a student of the student's scholastic progress. These documents include, but are not limited to, official transcripts; final grade reports detailing each course code, course title, and final grades for a given year and term; and any documented change to final grades.

Record, Financial Aid. Official documents regarding any grant, scholarship, or loan offered to assist the student in meeting college expenses. Documentation may vary depending upon the funding source (e.g. state or federal programs, high schools, foundations, or corporations).

Record, Student. A record (electronic or hard-copy) which is comprised of, at a minimum, a student's admissions and advisement, permanent academic, and financial aid records. A file which may contain the following: a record of the student's scholastic progress, the extracurricular activities, personal characteristics and experiences, family background, secondary school background, aptitudes, interests, counseling notes, etc.

B. LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

Explanation of Proposed Changes

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The Council proposes changes to library and instructional equipment that require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are increasingly additional online library services that provide further access to students. However, the Council continues to recognize the importance of on ground students having a physical space to access information.

3-1-800 – Library Resources and Services

The adequate provision of library resources and information services, appropriate to the academic level and scope of an institution's programs, is essential to teaching and learning. It is incumbent upon all member institutions to assess the level of library resources needed in relation to their programs and to provide a range of support to meet these needs. The size of collections and the budget allowed for library resources and services do not ensure adequacy. The quality, relevance, accessibility, availability, and provision of support services ultimately will determine the adequacy of an institution's efforts. In assessing library resources and services, ACICS requires that an institution, at a minimum, shall:

- (a) develop an adequate base core of library resources to support academic success and to meet instruction and research needs as appropriate;
- (b) ensure up-to-date means to access these resources;
- (c) develop a continuous assessment strategy for library resources and information services that includes staff and faculty;
- (d) provide adequate staff to support assessment, library development, collection, organization, and accessibility;
- (e) ensure that library services are provided to all learners, including those at nonmain campuses and those online;
- (f) provide training and encouragement for students and faculty to utilize library resources as an integral part of the learning process and as life-long learners; and
- (g) those campuses that have a residential component, must provide students a physical space on site or within close proximity to the institution in order to allow for access to library resources and services;

3-2-200 – Instructional Resources, Materials

The instructional resources, audiovisual teaching equipment, and instructional materials shall be adequate to serve the needs of the institution's educational programs. The resources shall be consistent with the institutional mission and include current print or digital titles, periodicals, professional journals, and/or full-text online resources appropriate for the institution's educational programs. There shall be evidence that appropriate instructional resources, equipment, technology, and materials are utilized to support the educational objectives.

3-2-201. References. The institution shall have available and easily accessible to faculty and students standard print, digital, or online reference works appropriate to the curriculum. Major consideration will be given to the diversity of the collection including

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~~variety of volumes~~ books, periodicals, online resources and information technology readily available to students and faculty, ~~reeeny their currency of publications~~, appropriateness, and relevance to the programs offered by the institution.

Budget (at all credentials)

3-2-204. Budget. Budget allocations and expenditures for instructional resources, equipment, and materials may be centralized and shall be sufficient to meet the needs and fulfill objectives of the institution's programs.

3-3-402, 3-4-402, 3-5-402, 3-6-702, 3-7-702. Budget. An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended for the purchase of books, periodicals, library equipment, print and/or digital books, periodicals, and other resource and reference materials.

Function (at all credential levels)

3-3-403. Function. The library function is shaped by the mission and the educational programs of the institution. Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings. The resources shall include the study, reading, and information technology facilities necessary to make the educational programs effective. The ultimate test of the library's adequacy is determined by the extent to which its resources support all the courses offered by the institutions.

3-4-403, 3-5-403. Function. The library function is shaped by the mission and the educational programs of the college. Appropriate reference, research, and information resources must be made available to provide basic support for curricular and educational offerings and to enhance student learning.

3-6-703. Function. The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students should discover information in a variety of formats with an appropriately supporting information technology infrastructure.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, ~~as appropriate~~, information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

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Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to ~~make~~ enhance the effectiveness of the educational programs ~~effective~~.

3-7-703. Function. The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students demonstrate the ability to define problems, access, evaluate, and analyze a variety of resources, and use retrieved information ethically.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, ~~as appropriate,~~ information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to ~~make~~ enhance the effectiveness of the educational programs ~~effective~~.

Use and Accessibility (at all credential levels)

3-3-404. Use and Accessibility. In evaluating the use of library resources by students, consideration shall be given to accessibility and to methods used by the faculty to encourage the use of these resources by students. Records of physical and/or online circulation and inventory shall be current and accurate.

Physical and/or online library materials and services must be available at times consistent with the typical student's schedule in ~~both day, and evening,~~ and online programs. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. If online resources are utilized, an appropriate number of terminals and/or wireless access shall be provided for student use. Interlibrary agreements are not substitutes for an institution's library, but rather a means to supplement the institution's holdings in limited areas. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students.

3-4-404, 3-5-404, 3-6-704, 3-7-704. Use and Accessibility. The faculty should inspire, motivate, and direct student usage of the library resources. The library's adequacy

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ultimately is determined by the extent to which physical and/or online resources including full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online resources including full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule ~~in both day, and evening,~~ and online programs. If online or computer based resources are ~~computer software is~~ utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the nature of the participating library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online resources including full-text reference materials appropriate for the offerings of the institution.

Holdings (at all credential levels)

3-3-405. Holdings. The institution shall have available and easily accessible standard physical and/or online reference works, professional journals, and current periodicals appropriate to the curriculum. Consideration also shall be given to supplementary library resources contracted by the institution and online resources available to its student body.

3-4-405, 3-5-405. Holdings. A collegiate library shall contain up-to-date physical and/or online resources including full-text titles appropriate for the size of the institution and the breadth of and enrollment in its educational programs. The library collection shall include holdings on the Humanities, Arts, Social Sciences, and Sciences, including mathematics; magazines and essential professional journals and periodicals; ~~and, when appropriate, online data networks and retrieval systems, CD-ROMs, and interactive research systems~~ that support all of the course offerings of the institution.

3-6-705. Holdings. The library shall support the academic programs and the literacy, intellectual, and cultural development of students, faculty, and staff; shall provide current and appropriate physical and/or online, full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; ~~shall provide, when appropriate, on-line data networks and retrieval systems, CD-ROMs, and interactive research systems;~~ and shall be capable of supporting an understanding of the methods and principles of scholarly research and how to use information ethically ~~and/or scholarly research~~ at the graduate level.

3-7-705. Holdings. The library shall support the academic programs and the intellectual and cultural development of students, faculty, and staff; shall provide current and appropriate physical, digital, and/or online full-text resources for the size of the institution

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and the breadth of and enrollment in its educational programs; ~~shall provide, when appropriate, physical and/or on-line, full-text data networks and retrieval systems, CD-ROMs, and interactive research systems;~~ and shall be capable of supporting scholarly research at the ~~graduate~~ doctoral level.

Staffing (at all credential levels)

3-4-401, 3-5-401. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one who holds a bachelor's or master's degree in library or information science or a comparable program, or state certification to work as a librarian, where applicable, or, for foreign institutions, who holds a bachelor's or master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

During library hours that are scheduled and posted, there shall be a trained individual on-site who is assigned to oversee and to supervise the library and to assist students with library and information services. This individual shall be competent and technologically literate to use and to aid in the use of the online and computer based library ~~technologies~~ and resources.

3-6-701, 3-7-701. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one with special qualifications to aid students in research and who holds a M.L.S. degree or the equivalent, or, for foreign institutions, who holds a master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of

transcripts in languages other than English. The professionally trained individual must participate in annual documented professional growth activities.

There shall be a professionally trained individual on duty for sufficient hours, as published by the institution, to support the programs and to assist students with library functions and research. This individual shall be competent both to use and to aid in the use of the physical, computer based, digital and online library technologies and resources.

Appendix H- Principles and Requirements for Nontraditional Education

Resources and Equipment

(b) The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If the majority of a student's classes are online, these resources must include at a minimum access to a virtual library collection of program-related books, journals, and periodicals, and access to virtual library and information technology services.

C. FACULTY FIELD PREPERATION

Explanation of Proposed Changes

The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level.

3-2-102. Field Preparation. Assignments requiring more than three preparations in different fields (e.g., allied health, business, criminal justice secretarial studies, business administration, data processing) shall not be given to an instructor at any given time during one academic term.

D. WORKSHOP ATTENDANCE TIMEFRAME

Explanation of Proposed Changes

The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.

2-1-100 – Accreditation Workshop Requirements

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops,

Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials~~self-study~~. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, and representatives of centrally controlled institutions are required to attend. Currently accredited centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.

E. ADMISSIONS, TRANSFER CREDIT, AND CATALOG DISCLOSURES

Explanation of Proposed Changes

The Council proposes to revise a number of items related to the admissions, transfer of credits, and disclosure requirements in this area. Institutions must ensure that foreign transcripts of international students are validated for their equivalency to U.S. requirements for the purposes of admissions or transfer of credit. In addition, institutions may only accept transfer credits from accredited institutions that are recognized by the U.S. Department of Education or by their respective governments. Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

3-1-411. Admissions. The admissions policy shall conform to the institution's mission, shall be publicly stated and shall be administered as written. The following minimums apply:

- (a) The requirements for students admitted to programs leading to a certificate, diploma or degree shall include graduation from high school or its equivalent, or demonstration of the student's ability to complete the program under the ability-to-benefit classification as specified under standard 3-1-303(b) and (c), as provided for by governing laws. Foreign transcripts of international students seeking admission must be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to validate equivalency with graduation from high school and eligibility to enter college or university in the United States.
- (b) It is the responsibility of the institution to maintain student records which reflect the requirements for admission of all students.
- (c) Institutions are not precluded from admitting, under different requirements, students who are beyond the age of compulsory school attendance or who may be otherwise specifically circumstanced, such as:

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- (i) having financial sponsorship through contractual agreements with public or private organizations
- (ii) having identifiable needs requiring remedial instruction as a supplement to the regular curriculums
- (iii) participating in innovative postsecondary programs specially described to ACICS; or
- (iv) being enrolled in individual courses not leading to an academic credential.

...

3-1-413. *Transfer of Credit.* An institution shall evaluate and consider awarding proper academic credit for credits earned only at institutions that are either accredited by agencies recognized by the United States Department of Education, or recognized by the respective government as institutions of higher education, for internationally-based institutions. The institution shall establish and adhere to a systematic method for evaluating and awarding academic credit for those courses that satisfy current program course requirements, including an evaluation of all foreign transcripts by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES), prior to the evaluation and award. Written policies and procedures must clearly outline the process by which transfer of academic credit is awarded. The institution shall ~~make public~~ disclose in its catalog its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and if applicable, a list of institutions with which the institution has established articulation agreements.

In addition, the institution must ~~provide notification to students as to~~ disclose in its catalog these articulation agreements and clear and unambiguous language relative to the likelihood of the transferability of the credits issued in the programs that are offered.

...

Appendix C – Institutional Publications Requirements

At a minimum, the catalog must contain the following items:

...

21. A statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and, if applicable, a list of institutions with which the institution has establish articulation agreements (See Section 3-1-413).
22. A statement on the transferability of the credits in the programs that are offered (See Section 3-1-413).

23. A description of the contracts or agreements and the services to be provided, if the institution has entered into an agreement with an accredited institution, an agreement with an unaccredited institution, or an international partnership agreement (See Sections 2-2-504, 2-2-505, and 2-2-507 for additional information).
24. If the institution offers degrees, the catalog must include the following information:
- (a) for occupational associate's degree programs, identification of courses that satisfy the general education requirement and an explanation of the course numbering system;

...

F. EXTERNSHIP DEFINITION

Explanation of Proposed Changes

The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.

Glossary of Definitions

Externship. A supervised-practical experience, under the supervision of a faculty member, that is the application of previously studied theory. ~~Under the supervision of a faculty member,~~ a written agreement shall be developed that outlines the arrangement between the institution and the externship site, including specific learning objectives, course requirements, and evaluation criteria.

G. MISSION STATEMENT

Explanation of Proposed Changes

The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.

3-1-100 – Mission: Purpose and Objectives

Every institution must have a mission which is its specific purpose for existing. The mission must include a mission statement and a set of objectives which together clearly define the purpose of the institution. ~~This mission, together with a set of objectives to accomplish it, must be summarized in a mission statement.~~ The objectives should be

ACICS MEMORANDUM TO THE FIELD

September 16, 2016

devoted substantially to career-related education and should be reasonable for the program of instruction, mode of delivery, and facilities of the institution.

H. LEARNING SITE DEFINITION

Explanation of Proposed Changes

The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.

1-3-103. Learning Site. A learning site is a classroom extension of a main campus or branch campus that is ~~apart from the managing location~~ within five miles of the managing campus; ~~offers less than 50% of a program of study;~~ and maintains academic quality by is ~~capable of providing~~ providing sufficient academic and administrative oversight ~~providing~~ and access to all student services and instructional resources.; ~~and maintaining required to academic quality.~~ Learning sites that are greater than five miles from the managing campus and offer student transportation to the managing campus; or are used for delivery of distance education activity; or collaborative arrangements with other entities for specific on-site educational activity must be approved by the Council on a case-by-case basis and are subject to a quality assurance visit as specified by the Council. All learning sites are subject to an on-site evaluation visit during the managing campus renewal of accreditation evaluation visit.

4. For Information Only

A. ELECTIONS AND VOTING PROCEDURES

The ACICS Board of Directors approved a revision to the bylaws relative to the voting power of institutions. A central characteristic of accreditation is the member institutions' views, values, and involvement represented in the standards they approve and uphold in conjunction with their support of an independent Council to develop, interpret, and apply those standards. In order to strengthen this process and better align the electoral influence of the membership's composition, the Council determined that each institution (defined as

ACICS MEMORANDUM TO THE FIELD

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a main campus) and not each campus will have one Designated Delegate vote on elections and decisions of the membership.

This revision is effective immediately.

Article IV

Elections, Terms, Vacancies, Removal, Resignations, and Compensation

Section 2–Eligibility for Election and Voting. Any person employed by a member institution in good standing and meeting other eligibility criteria is eligible to run for Council and Board membership. Each main ~~and branch~~ campus is entitled to one Designated Delegate who is authorized to vote in all elections on behalf of that member institution as well as, in all other matters requiring a vote of the members. Appointment of the Designated Delegate is made by the chief executive officer of the institution by notice in writing to ACICS. Multiple campuses under common ownership may be represented by one designated delegate, who shall be empowered to cast votes on behalf of each main campus. Changes of Designated Delegate shall be made in writing at least fifteen (15) days prior to the date of any scheduled election, which becomes the record date for determining eligibility to vote. Results of elections shall be certified by the Executive Committee.

Section 3. Voting Procedures. Specific election procedures concerning candidate qualifications, deadlines for registration, dates and methods of balloting and absentee balloting shall be developed by the Board and may vary from election to election. Electronic voting, properly secured, shall be allowed. The following general procedures shall apply to all voting:

- (a) there shall be no more than at least two candidates nominated for each elective position by the Nominating Committee;
- (b) nominations by petition for each elective position will be permitted if such petition (i) is received at least 45 days prior to the date of the election, (ii) contains the names and signatures of Designated Delegates representing at least ten percent of the institutions that are members of ACICS, (iii) demonstrates that the petitioner satisfies the eligibility requirements contained in Section 2 of this Article, and (iv) meets any other procedural requirements which may be established by the Board;
- (c) every member, if properly registered and current with financial obligations, shall have the opportunity to vote;
- (d) proxy voting is not permitted in elections;
- (e) no more than one person from any institution or group of institutions commonly owned, may serve at any one time on the Council;
- (f) voting on behalf of multiple members under common ownership and control by one Designated Delegate may be permitted on membership-wide matters. The multiple members represented by one Designated Delegate must be recorded with the Secretary prior to the vote, and the multiple members represented by a single Designated Delegate shall count toward a quorum;
- (g) only the Designated Delegate of each member is eligible to vote;
- (h) voting shall be by secret ballot, which includes secure electronic balloting;

- (i) a majority vote, unless otherwise provided by these Bylaws, shall decide all non-candidate matters; and
- (j) a plurality vote shall decide all candidate elections.

B. 2017 CAMPUS ACCOUNTABILITY REPORT ENHANCEMENTS

The Council has initiated a requirement for the 2016-2017 Campus Accountability reporting period that every campus, every month must submit placement information for its graduates through ACICS' Placement Verification Program (PVP), which is due by the end of the subsequent month (i.e. July placements were due by August 31, 2016). The Council also approved the process that only placements which are verified through the PVP will be counted as placements for the 2017 CAR. For additional information regarding the Placement Verification Process and to upload your information, please use www.acicspvp.com. On the ACICS web site, you will also find guidelines, presentations, webinars, and answers to frequently asked questions regarding the PVP process.

C. ADMISSION AND RECRUITMENT REVIEW – SECRET SHOPPER PROGRAM

The Council has initiated an enhanced process for reviewing admission and recruitment procedures. In coordination with the new requirements that institutions must have a process and documentation for monitoring recruitment personnel as well as the ongoing efforts of the At-Risk Institution Group (ARIG), the Council has approved the procedure of utilizing external secret shopper agencies for additional review of institutional practices. If ACICS receives information or has reason to believe that an institution may be providing inaccurate or misleading information, ACICS will initiate an investigatory process that may include the use of secret shops to obtain further information about admission and recruiting practices. The information gathered through this process will be provided to the Council for review and any areas of noncompliance that may occur for these instances will be provided to the institution in writing for response.

D. REQUIREMENT FOR UP-FRONT VISIT COSTS

The Council will implement a process for collecting visit fees prior to the commencement of an on-site evaluation visit. The fees are due prior to the visit, and if not collected, the on-site evaluation visit will not occur and the institution will be subject to revocation.

This requirement will go into effect for the **April 2016 review cycle** (the Winter 2017 travel cycle).

E. ACICS AWARE WEBINAR

An AWARE webinar will be held on **Thursday, September 22, 2016 at 2:00 pm**. This webinar will focus on information presented in the September 2016 Memorandum to the Field. ACICS is eager to respond to all questions related to this communication; therefore, if you have any questions prior to the AWARE Webinar or requests for discussion on additional topics, please send an email to Mr. Ian Harazduk at iharazduk@acics.org, so that these responses can be prepared and shared during the webinar.

F. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: The institutional ACICS ID should be used on all correspondence to and from ACICS. If you have questions about your ID code, please send an email to ebiz@acics.org.

5. Comment Survey – Proposed Criteria Revision

The Council encourages students, faculty, administrators, evaluators, employers, and other interested parties to provide feedback regarding Council operations and procedures.

Comments on the proposed *Criteria* revisions are due by **Friday, November 4, 2016**.

ACICS is collecting all comments from the field on proposed *Criteria* revisions through an electronic survey. Please find the survey link below:

<https://www.surveymonkey.com/r/MTTF092016>

If you have any questions about the memorandum to the field or the call for comment, please contact:

Mr. Ian Harazduk

Associate Vice President

Phone (202) 336-6795

iharazduk@acics.org

The AWARE Webinar Will Begin Momentarily

- Have questions? Submit them using the Go-to-Webinar dialogue box.
- Q&A are archived on our website under Frequently Asked Questions under the Events and Workshops tab!



The AWARE Webinar Will Begin Momentarily

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ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

AWARE Webinar

September 22, 2016

2:00-3:30pm EST

ACICS Webinar Announcing, **Relating & Explaining**
The September 2016 Memorandum to the Field



Today's Presenters

- **Roger J. Williams**, Interim President
- **Ian Harazduk**, Associate Vice President, Accreditation and Institutional Development
- **Perlter Walters-Gilliam**, Associate Vice President, Quality Enhancement and Training
- **Terron King**, Senior Manager, Institutional and Program Review

WELCOME!



Agenda

- **Topic I: *Final Criteria Revisions***
- **Topic II: *For Information Only***
- **Topic III: *Proposed Changes to the Accreditation Criteria***
- **Questions and Comments**





ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Available at www.ACICS.org

To view the Memo:

> Council Actions

>> Memorandum to the Field

>>> 2016 September

The screenshot shows the ACICS website navigation menu with the following items: About Us, Accreditation, Council Actions, Students, Evaluators, and Events/Workshop. A dropdown menu is open under 'Council Actions', listing: Memorandum to the Field, Initial Applicant Institutions, Institution Closings, Accreditation Conditioned, Voluntary Withdrawal, Evaluation Schedule, Adverse Actions, and Institutions on Show-Cause. Below the menu is a photograph of a woman walking on a campus path. The main content area is titled 'Memorandum to the Field' and contains the text: 'After each Council meeting, ACICS staff will publish a memorandum to ACICS-accredited institution interested parties which includes final criteria changes, proposed criteria changes, and general information on membership on a number of topics.' At the bottom, there is a list of dates: 2016, September, May, and April.



TOPIC I:

FINAL CRITERIA REVISIONS



Final Criteria Revisions

- **Teach-Out Requirements**
- **Guidelines on Notification of Title IV Concerns**
- **Good-Cause Extension Timeframe**



Teach-Out Requirements

EFFECTIVE IMMEDIATELY

Section 2-2-303

The Council included language relative to when an institution is required to submit a teach-out plan. These requirements were stated previously in ACICS procedural documents.

Key components:

- Must be submitted when an institution receives notification from the Department of Education on actions taken against an institution's participation in the Title IV program, a denial or withdrawal action by ACICS, a notification to cease operations, and notification from the state licensing authority of a revocation action.
- Plan may need to include a formal teach-out agreement with another institution
- Aligns with regulation 34 CFR § 602.24(c)(1)



Guidelines on Notification of Title IV Requirements

EFFECTIVE IMMEDIATELY

Appendix G

The Council revised language to provide a more definitive process, which aligns with regulation 34 CFR § 602.27(a)(6).

Key components:

- When ACICS has reason to believe an institution may be failing its Title IV responsibility, the Department will be informed through written, established protocols in a timely manner



Good-Cause Extension

EFFECTIVE IMMEDIATELY

Title II, Chapter 3

The Council revised language to provide a more definitive process for a good-cause extension time frame.

Key components:

- The new language states “In no event will the good-cause extension exceed one year.”



TOPIC II: FOR INFORMATION ONLY



For Information Only

- **Elections and Voting Procedures**
- **2017 Campus Accountability Report Enhancements**
- **Admission and Recruitment Review-Secret Shopper Program**
- **Requirement for Up-Front Visit Costs**



Elections and Voting Procedures

For Information Only

Article IV of Bylaws

- Each institution (defined as a main campus) and not each campus will have one designated delegate vote in elections and decisions of the membership
- Better aligns electoral influence on actual membership composition
- Effective immediately



CAR Enhancements

For Information Only

- Beginning on July 1, 2016, each campus must submit monthly submissions for placement verification in the subsequent month (i.e. July placements due on August 31, 2016, August placements due on September 30, 2016, etc.)
- Only verified placements will be counted on the 2017 CAR
- For further information, visit www.acicspvp.com or www.acics.org to view guidelines and webinars



Admission and Recruitment

For Information Only

- In conjunction with new recruitment oversight practices and ARIG investigations, ACICS will use external secret shopper agencies when ACICS receives information or has reason to believe inaccurate or misleading information is being used through the recruiting and admissions process
- Information gathered will be provided to the Council and areas of noncompliance sent to institution in writing



Up-Front Visit Costs

For Information Only

- Visit fees invoiced and collected prior to visit
- If fees not paid prior to scheduled visit date, then visit will not occur and institution subject to revocation
- In effect for the Winter 2017 (January/February) visit cycle.



TOPIC III: PROPOSED CRITERIA REVISIONS



Proposed Criteria Revisions

- **Council Actions/Probation Standard**
- **Campus Effectiveness Plan and Appendix K**
- **CAR Procedures and Guidelines and Appendix I**
- **Requirement for Title IV Compliance Audit**



Proposed Criteria Revisions (Systematic Review)

- **Basic Records**
- **Library, Instructional Resources, and Technology**
- **Faculty Field Preparation**
- **Workshop Attendance Timeframe**
- **Admissions, Transfer Credit, and Catalog Disclosures**
- **Externship Definition**
- **Mission Statement**
- **Learning Site Definition**



Council Actions/Probation Standard

Proposed Revisions

Section 2-3-100 through Section 2-3-502

The Council proposes streamlining its current Council action procedures.

Key components:

- Removed admonition as a possible action
- Added language that Council may take an action at any time following review of relevant information concerning an institution
- **Probation order** has been absorbed the action of **Show-cause directive**
- All hearings will be in writing unless an in-person hearing is specifically authorized by the Council



Campus Effectiveness Plan and Appendix K *Proposed Revisions*

Section 3-1-110 through Section 3-1-113 and Appendix K

The Council proposes revisions to requirements of the CEP as well as the addition of an Appendix K which will provide detailed guidelines.

Key components:

- The addition of graduation rate and cohort default rate (if applicable) as **required** elements
- Progress reports must be completed at least **biannually**
- Non-traditional modes of delivery must be integrated and analyzed
- Graduate satisfaction evaluated no sooner than 30 days and within 6 months following graduation
- Licensure pass rates (if applicable) must be evaluated as a required student learning outcome



CAR Procedures and Guidelines

Proposed Revisions

Sections 2-1-809, 2-2-502, and 2-2-503 and Appendix L

The Council proposes revisions to criteria to further define actions that may be taken in relation to student achievement as well as the addition of an Appendix L to provide further guidelines, current student achievement rate standards, monitoring statuses and actions to be taken for those which do not meet these standards.

Key components:

- If Council deems an institution significantly out of compliance relative to student achievement outcomes, it will take an adverse action
- Programs placed on probation status will be required to immediately notify students and the public



CAR Procedures and Guidelines (cont'd)

Proposed Revisions

Sections 2-1-809, 2-2-502, and 2-2-503 and Appendix L

Key components (cont'd):

- When an institution is below Council standard, the campus and/or program will be considered out of compliance
- Probation order will be issued against any campus or program that falls below 50%, after which campus will have one year to come back into compliance
- Criteria changes would apply to 2016 CAR submission



Requirement for Title IV Compliance Audit

Proposed Revisions

Section 2-1-803

The Council proposes all institutions that participate in Title IV program must submit their compliance audit along with their Annual Financial Report (AFR) for review by ACICS.

Key component:

- Addition of language requiring the Title IV compliance audit



Basic Records

Proposed Revisions

Sections 3-1-303

The Council proposes revisions to clarify and update language regarding appropriate record keeping. Glossary definitions were also added to define different records.

Key components:

- Clarified definition a student records
- Addition of electronic records management systems and software as acceptable methods of protecting records
- Institution must adopt and publish policy for properly maintaining records which addresses academic records, admissions and advisement records, and financial aid records



Library, Instructional Resources, and Technology

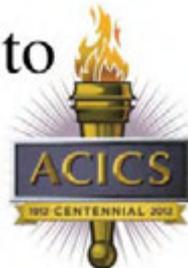
Proposed Revisions

Sections 3-1-800, and all credential levels for budget, function, use and accessibility, holdings, staffing, and Appendix H

The Council proposes language changes to ensure resources lead to academic success and also address requirements when institutions utilize online library resources.

Key components:

- Institution must provide up-to-date means to access resources
- Continuous assessment strategy that includes faculty and staff
- All residential campuses must provide a physical space to allow for student access to library resources



Faculty Field Preparation

Proposed Revisions

Section 3-2-102

The Council proposes revisions to update language and provide clarification.

Key components:

- No more than three preparations in different fields at any given time



Workshop Attendance Timeframe

Proposed Revisions

Section 2-1-100

The Council proposes revisions to the 18-month timeframe requirement for the accreditation workshop

Key components:

- Institutional representatives must attend the workshop within 18 months of the submission of the evaluation visit materials instead of the self-study



Admissions, Transfer Credit, and Catalog Disclosures

Proposed Revisions

Sections 3-1-411, 3-1-413 and Appendix C

The Council proposes revisions to admissions criteria, transfer credits, and disclosure requirements.

Key components:

- Transcripts of foreign students seeking admission must be evaluated for equivalency by a member of AICE, AACRAO, or NACES
- Credits for transfer may also be considered from international institutions recognized by their respective government as an institution of higher education
- Requirement of clear language in catalog regarding requirements for acceptance of transfer credits and any articulation agreements



Externship Definition

Proposed Revisions

Glossary

The Council proposes revisions to the glossary definition of externship to provide clarification

Key components:

- The practical experience must be under the supervision of a qualified faculty member



Mission Statement

Proposed Revisions

Section 3-1-100

The Council proposes revisions to language to clarify expectations on the mission statement and objectives

Key components:

- The mission statement along with a set of objectives define the purpose of the institution



Learning Site

Proposed Revisions

Glossary

The Council proposes revisions to language set clear distance parameters on learning sites

Key components:

- A learning site is to be located within a 5-mile radius of the managing campus
- Those located more than five miles from the managing campus and offer transportation, are used for delivery of distance education, or other specific arrangements must be approved on a case-by-case basis



Question & Answer



Please type in any questions or comments you might have!





ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Available at www.ACICS.org

To view the Slides:

> Events/Workshops

>> Webinars

>>> AWARE

The screenshot shows the ACICS website interface. At the top, the ACICS logo and name are displayed. Below the logo is a navigation menu with links: Home, About Us, Accreditation, Council Actions, Students, Evaluators, Events/Workshops, and News. The 'Events/Workshops' link is highlighted with a red arrow. A dropdown menu is open under 'Events/Workshops', showing options: ACICS Centennial, 2012 Workshop Schedule, Registration Instructions, Workshop Descriptions, Webinars, Calendar of Events, Past Annual Meetings, and Visiting Washington, DC. The 'Webinars' option is highlighted with a red arrow. Below the navigation menu, the 'Events/Workshops' section is visible, with a sub-section for 'Webinars'. The 'Webinars' section includes a description: 'Webinars are free informational seminars that are accessed over the Internet. The sessions are designed for schools but will also be of interest to evaluators and others.' Below this, there is a list of 'Available Webinars':

- Evaluator Training
- AWARE
- IEP Webinar
- Self-Study Submission
- Archived Webinars

Below the list, there is a section for 'Evaluator Training Modules' with a paragraph of text: 'Please note registration for the Evaluator Workshop has changed. For more information, visit Step 5 of Becoming an Evaluator. Effective January, 2010, evaluator training consists of three pre-recorded Go-To-Webinar modules and one live two hour Go-To-Webinar. The final two hour live Go-To-Webinar is by invitation only.'



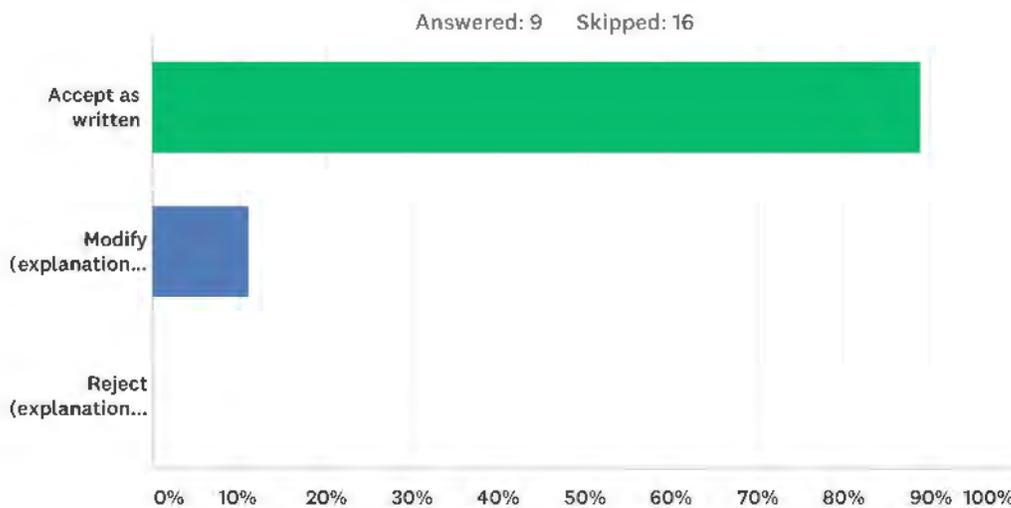
Comments from the Field



Thank you for attending the AWARE Webinar! Please provide your feedback to the *September 2016 Memorandum to the Field* via our electronic survey: <https://www.surveymonkey.com/r/MTTF092016>



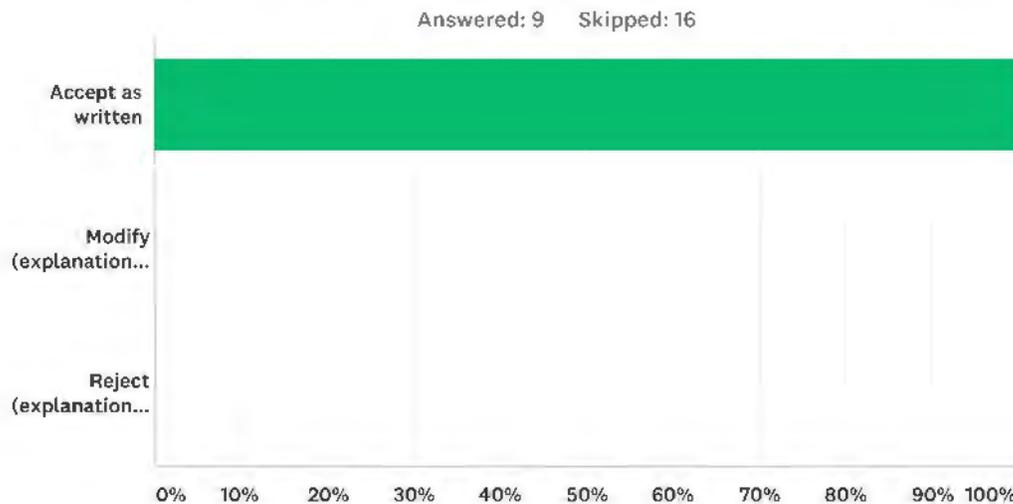
Q3 Council Action/Probation Standard: The Council proposes to streamline its current Council action procedures. A number of proposed changes are included within this item, namely, the removal of “admonition” as a formal Council action, removal of a “show-cause directive” and replacement with a “probation order”, and the determination that all hearings before the Council will be in writing unless an in-person hearing is specifically authorized by the Council during the meeting at which it issues a probation order. The Council determined that there is a surplus of possible Council actions and in order to streamline the process, it has decided to propose the combination of the severe noncompliant action of show-cause and the supplemental action of probation into one action that requires notification to the U.S. Department of Education, the students, and the public. If the language is accepted, then all sections of the Accreditation Criteria that describe a “show-cause directive” will be revised with a “probation order.”



Answer Choices	Responses
Accept as written	88.89% 8
Modify (explanation needed)	11.11% 1
Reject (explanation needed)	0.00% 0
TOTAL	9

#	Explanation	Date
1	In person should be available.	10/15/2016 3:34 PM

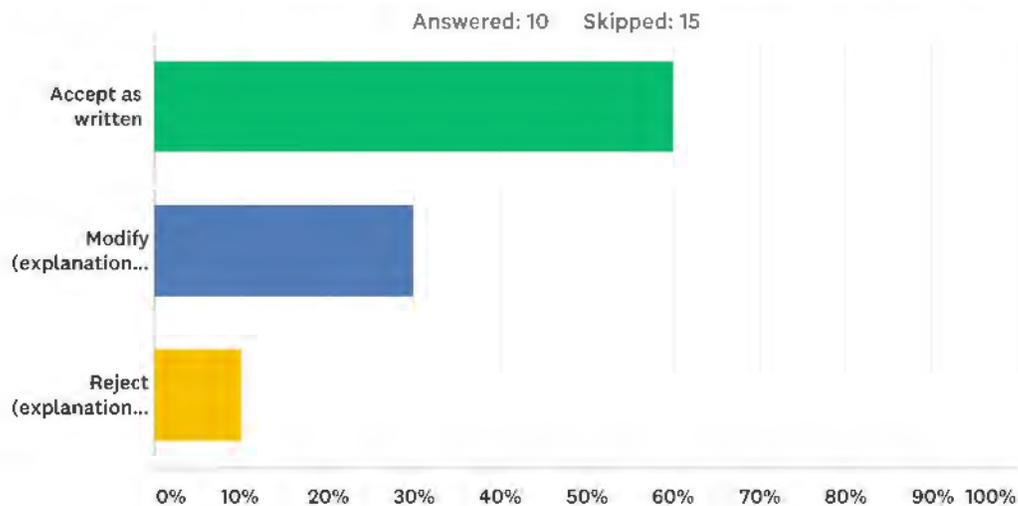
Q4 Campus Effectiveness Plan - Appendix K: The Council has proposed a series of revisions to the Campus Effectiveness Plan (CEP). The changes include the addition of “Appendix K,” which will detail the guidelines and requirements for the CEP, including all evaluation elements and monitoring processes. In addition, the Council proposes adding two more important new measurements, namely, the program- and campus-level graduation rate, and the institutional cohort default rate.



Answer Choices	Responses	Count
Accept as written	100.00%	9
Modify (explanation required)	0.00%	0
Reject (explanation required)	0.00%	0
TOTAL		9

#	Explanation	Date
	There are no responses.	

Q5 Campus Accountability Procedures and Guidelines - Appendix L: The Council proposes to include all of the standards related to student achievement and the Campus Accountability Report (CAR) in “Appendix L” of the Accreditation Criteria. The new Appendix includes the current student achievement rates and the applicable monitoring statuses and actions for campuses and programs that are not meeting acceptable student achievement indicators. In the proposed language, the Council more clearly defines the point at which a particular action will be taken, including the issuance of an adverse action, a probation order, a compliance warning, or reporting and restrictions against a campus or program. The Council also proposes revising language in corresponding sections of the Criteria, such as student achievement review and Council actions at the program-level.



Answer Choices	Responses
Accept as written	60.00% 6
Modify (explanation needed)	30.00% 3
Reject (explanation needed)	10.00% 1
TOTAL	10

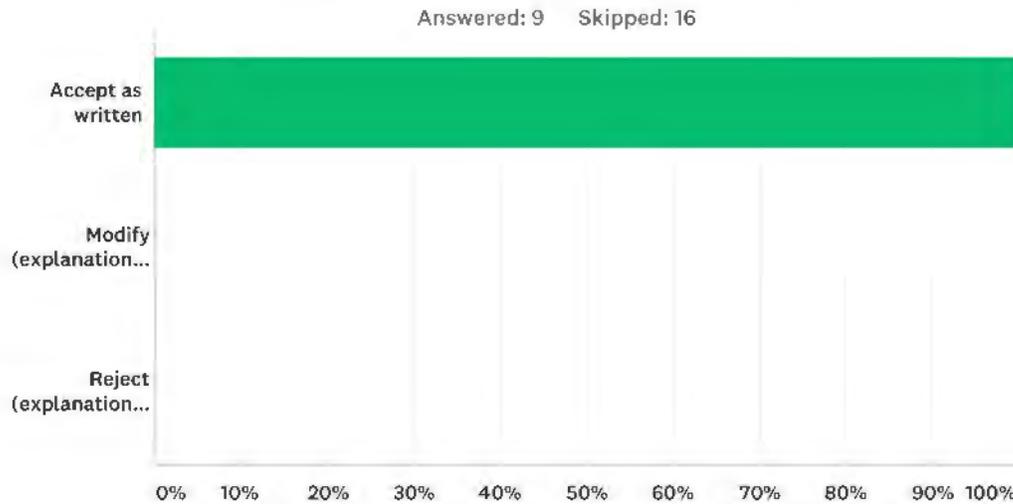
#	Explanation	Date
1	I. INTRODUCTION On September 16, 2016, ACICS issued a Memorandum to the Field proposing to make certain changes to its Accreditation Criteria. Among the changes proposed are the following: • Elimination of the directive to show cause and replacement with probation. • Permitting ACICS to take “immediate adverse action” (withdrawal by suspension or termination of a program) without a hearing prior to the action. • Application of the new provisions	11/4/2016 12:37 PM

retroactive to the 2013 reporting year. Serious problems exist with these proposed provisions as explained in detail below. II. ANALYSIS A. As Proposed, ACICS Would Be Able to Take Adverse Action Against an Institution Without Required Due Process The proposed new language appears to permit ACICS to take immediate adverse action against an institution without the benefit of notice to the institution and an opportunity for the institution to respond before taking such action against an institution in violation of federal recognition regulations. As an accrediting agency recognized by ED to be a “reliable authority as to the quality of education or training offered for the purposes of [Title IV],” ACICS is subject to federal law that compels it to establish and apply review procedures that “comply with due process.” 20 U.S.C. § 1099b(a)(6). ED has detailed directly in 34 C.F.R. § 602.25 what those procedures require to comport with due process but other regulations also address due process requirements. See, e.g., 34 C.F.R. §§ 602.18, 602.20, & 602.23. These regulations require that accrediting agencies ensure consistency in decision-making, progressive compliance procedures, and publication of the standards and procedures it uses to determine whether to take any adverse action regarding accreditation. Id. ACICS’s Bylaws and Criteria reflect these federal requirements and specifically require the Council to “provide mechanisms for appeals and dispute resolution to ensure due process in resolution of conflicts between members and the Council.” ACICS Bylaws, Article III, Section 2(d). The Bylaws, moreover, require that all Criteria that Council promulgates “ensure that institutions are provided a fair and reasonable opportunity to present reasons why denial, suspension, withdrawal, or other final actions taken by the Council are inappropriate and should be remanded for further consideration.” Article VII, Section 2. These Bylaws, undoubtedly, stem from federal recognition regulations, which dictate the process accrediting agencies must provide to its member institutions prior to taking adverse action against them. An “adverse action” includes, but is not limited to the denial, withdrawal, suspension, revocation, or termination of accrediting action “or any comparable accrediting action an agency may take against an institution or program.” 34 C.F.R. § 602.3. Federal recognition regulations require that before ACICS takes any adverse action against an institution it must 1) notify the institution of any deficiencies it has identified; and 2) give the institution an opportunity to respond in writing to the alleged deficiencies within a designated timeframe. The relevant regulation reads: The agency must demonstrate that the procedures it uses throughout the accrediting process satisfy due process. The agency meets this requirement if the agency does the following: *** (d) Provides sufficient opportunity for a written response by an institution or program regarding any deficiencies identified by the agency, to be considered by the agency within a timeframe determined by the agency, and before any adverse action is taken. (e) Notifies the institution or program in writing of any adverse accrediting action or an action to place the institution or program on probation or show cause. The notice describes the basis for the action. (f) Provides an opportunity, upon written request of an institution or program, for the institution or program to appeal any adverse action prior to the action becoming final. 34 C.F.R. § 602.25(d)-(f) (emphasis added). However, ACICS appears to be proposing in Appendix L to permit it to take adverse action against an institution that does not meet certain student achievement rates before giving institutions the notice and opportunity to respond required by 34 C.F.R. § 602.25. Specifically, Appendix L states that current CAR submissions of institutions that show student achievement rates below 50% will be subject to probation or an “adverse action.” The following year, the proposed Appendix L would make all institutions with achievement rates below 50% subject to adverse action without the probation option. While the Appendix refers to the right for institutions to appeal adverse decisions to a Review Board, nothing in the proposed language states that these institutions would be provided with prior notice and a hearing under Criteria § 2-3-500. Plainly stated, if ACICS suggests that it may deny, withdraw, suspend, revoke, or terminate an institution’s accreditation or take comparable action because of student achievement rates not meeting a certain threshold, it will be in direct violation of 34 C.F.R. § 602.25(d). While 34 C.F.R. § 602.20(a)(1) permits an institution to “immediately initiate” an adverse action against an institution, the provision does not give ACICS license to immediately take adverse action against an institution. This distinction is critical. Section 602.25(d) unequivocally requires agencies to provide institutions with a right to respond to allegations about deficiencies before an adverse action is “taken;” but section 602.20(a)(1) permits an agency only to immediately “initiate” an adverse action, which would necessarily include providing an institution with both prior notice and an opportunity to respond before such action is actually “taken.” For these reasons, CSI respectfully recommends that ACICS change its proposed Appendix L only to permit the initiation of adverse action against an institution not meeting certain student achievement rates, but not to take such action until ACICS provides the institution with an opportunity to respond and be afforded a hearing pursuant to Criteria § 2-3-500. B. The Proposed Criteria Changes Would Permit ACICS to Impose Penalties to Institutions Retroactively and in Contradiction of Due Process and Contractual Rights of Institutions The new Student Achievement standards in proposed Appendix L would become effective for the

2013 reporting year. September 16, 2016 at 17. Data submitted for the 2013 reporting year was submitted by institutions in 2014 -- 2 years ago. Accordingly, ACICS proposes to subject institutions to standards for past years' performance when they had no way of predicting these substantial changes. This reach-back application is fundamentally unfair because it imposes a condition upon institutions of which it had no notice and, thus, is impermissibly retroactive. Courts have considered when a provision is retroactive in effect. For example, the U.S. Supreme Court has stated that in cases where a provision "impair rights a party possessed when he acted, increase a party's liability for past conduct, or impose new duties with respect to transactions already completed," the provision is impermissibly retroactive. See *Landgraf v. USI Film Prods.*, 511 U.S. 244, 280 (1994). In this case, it is clear that institutions could be subjected to adverse action impairing their right to accreditation for rates that were calculated for years in the past. Under these circumstances, ACICS should make any changes to the student achievement thresholds not effective until the 2016-17 reporting year. III. CONCLUSION For all of the reasons stated above, CSI respectfully encourages ACICS to change Appendix L to make it clear that institutions will have the right to a Section 2-3-500 hearing before any adverse action is taken against those not meeting student achievement thresholds and that the changes will not be effective until the 2016-17 reporting year. Footnotes: 1 In turn, this regulation stems from statute that requires agencies to have review procedures that "comply with due process" including providing institutions: (B) for sufficient opportunity for a written response, by an institution or program, regarding any deficiencies identified by the agency or association to be considered by the agency or association-- (i) within a timeframe determined by the agency or association; and (ii) prior to final action in the evaluation and withdrawal proceedings; 20 U.S.C. § 1099b(a)(6)(B). 2 It is not clear whether the student achievement rates referenced in Appendix L refer to aggregate achievement rates or something else. 3 There is some confusion about when these changes to Appendix L would become effective. While the memorandum refers to the 2013 reporting year on page 17, on page 14 the memorandum states that it would be applied to the data submitted in the 2016 CAR. Either way, ACICS would be applying new thresholds and consequences retroactively, i.e., for past performance.

2	<p>I understand that the proposed language suggests that these are guidelines for Council actions. However, the world can be more complicated than these seemingly-rigid guidelines imply. I certainly cannot anticipate all the scenarios in which the rigid language of the proposal would produce an application inconsistent with the intent of the proposal. But I think that the Council should consider explicitly identifying that it will take into consideration the impact of small cohorts and related-program results. Let me offer two examples, both of which occur in part due to small numbers and the ability to seamlessly switch between programs. #1: In most program areas, we offer a diploma option that is a subset of the associate degree program (all diploma courses transfer into the degree), and students have little pressure to choose one until the end of the diploma portion. However, they are not “stackable” in the sense that one does not automatically receive a diploma after taking all diploma courses. For example, all accounting students—diploma and degree—all start their programs together and take all courses in the first 8 months together as a cohort. For each student, there can be one of four outcomes: • The student withdraws in less than 8 months. • At the end of 8 months, some students decide to stop, receive a diploma, and enter the placement pool (because they are eager to work, do not want more debt, and/or are weaker students who may not last another 8 months). • At that 8-month point, other students decide to continue for 8 months, at the end of which 16-month program they will receive a degree—but not a diploma—and enter the placement pool. • The small number of students who make it through more than 8 months but less than 16 months are awarded a diploma at the point they withdraw (as they have met all of the diploma program requirements) and they enter the placement pool. Most of our students in many states initially enroll in the degree program so they may be eligible for state grants. However, the ability to switch so easily between the degree and diploma options can create different distortions in one or more of the programs in any given year. Here is a typical example: We could start a group of 13-14 in the accounting degree program and none in the diploma program starting at the same time. After 8 or more months, 1-2 weaker ones could graduate with a diploma and 0-of-1 or 1-of-2 may find employment in the field. After 16 months, 10 stronger ones could graduate with a degree and all 10 may find employment in the field. The overall placement rate is over 90%, but the diploma program shows a 0% or 50% placement rate and the degree program shows a 100% placement rate. A variation of this example is if only one accounting student elects to start in the diploma program and no one else switches into it. If that student withdraws, we show 0% retention and graduation rates. #2: Most prospective students interested in working in legal environments believe they want to work as paralegals. Our long experience suggests that many do not have the academic ability and/or preparation to become employable paralegals, but they do have the ability to become very functional legal administrative assistants. Thus, before we accept students interested in the 16-month paralegal degree program, we administer a placement test. If prospective students do not perform well enough on that placement test, we accept them into their second choice, which is essentially always the 16-month legal administrative degree program. The 10-month legal secretarial diploma program usually doesn’t attract too many students at the start. We tell these students that the first six months of all three programs are identical and they all will take those courses as a single cohort; if, through six months, legal administrative students demonstrate strong academic performance and/or paralegal students demonstrate weak academic performance, we allow or encourage students to switch between the two programs. What can result sometimes is a perfect storm for attrition in the legal administrative degree program. First, the weaker students originally were in that program, so there may already have been some attrition. Second, the portion of the legal administrative students who hoped to move into Paralegal but were unsuccessful may be disappointed, which can lead to attrition. Third, any students who performed so poorly that they were moved from paralegal to legal administrative in our hopes to get them through a program often can be embarrassed or disappointed; that also can lead to attrition. As a result, overall retention/graduation rates for the three related programs in this area often can be quite acceptable, but the paralegal degree retention/graduation rate can appear high and the legal administrative degree retention/graduation rate can appear low.</p>	10/30/2016 1:40 PM
3	<p>While I agree with the changes, schools should be notified in advance of potential adverse actions and have sufficient time to prepare for the changes. This is a retroactive action that is unfair to the schools. This should go into effect for the 2016/2017 CAR, not the 2015/2016 CAR.</p>	10/14/2016 11:29 AM
4	<p>I would suggest when campuses submit data that we submit not only by program but CIP code. As you know, many of our schools reviewed their programs for compliance with GE over the last 2 years and updated CIP codes, however, kept the same name of the program. Now those programs are implemented with the same name as something that is being taught out, the data will become muddled and not a true picture of either program.</p>	9/23/2016 4:26 PM

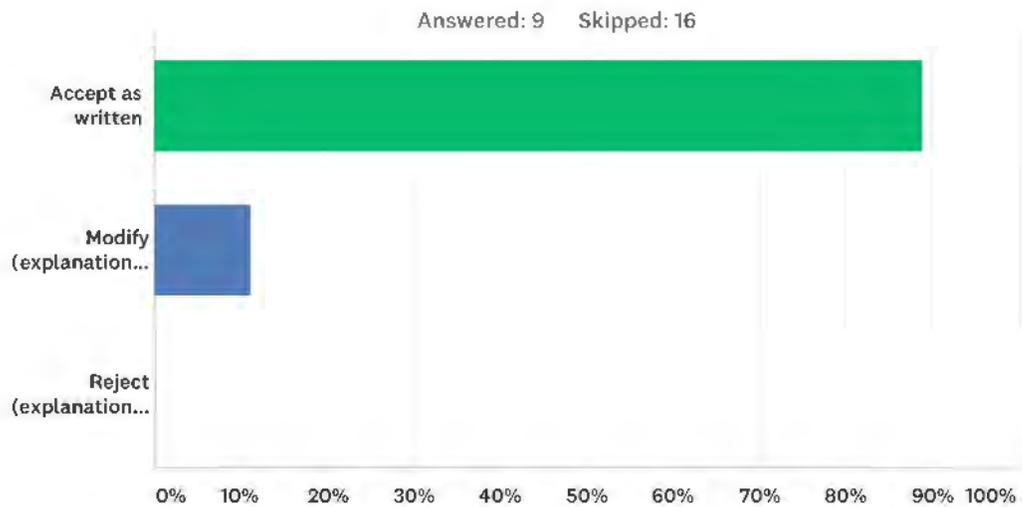
Q6 Requirement for Title IV Compliance Audit: The Council proposes that all institutions who participate in the Title IV program must submit its compliance audit along with its submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.



Answer Choices	Responses
Accept as written	100.00% 9
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
TOTAL	9

#	Explanation	Date
	There are no responses.	

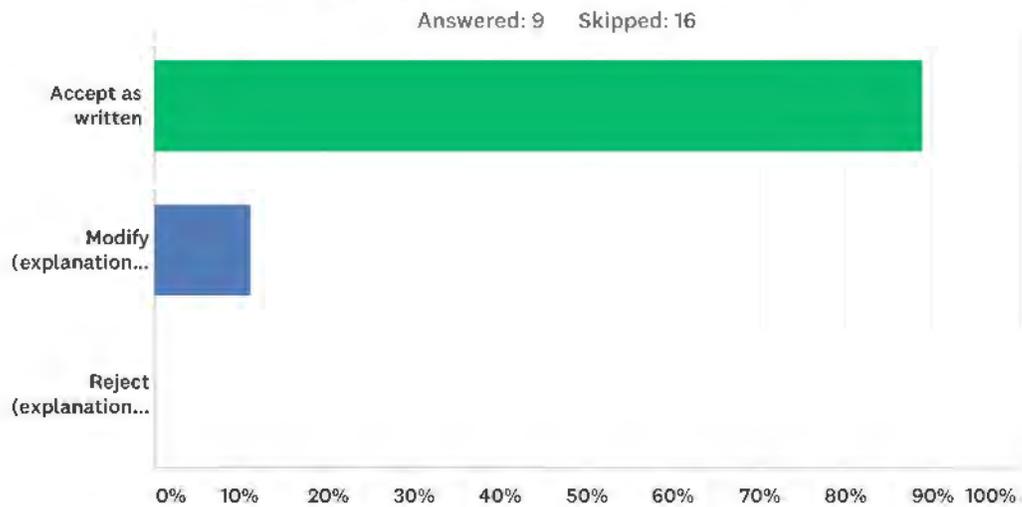
Q7 Basic Records: The Council proposes to clarify the language and definitions surrounding record maintenance and protection. The Council proposes updating the language on record protection and requiring institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council proposes more clearly defining student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.



Answer Choices	Responses
Accept as written	88.89% 8
Modify (explanation needed)	11.11% 1
Reject (explanation needed)	0.00% 0
TOTAL	9

#	Explanation	Date
1	The Council should clearly state that this is effective as of a date certain. School have not been required to maintain admissions and advisement records in the past, only the permanent academic record and financial aid records (for five years).	10/14/2016 11:29 AM

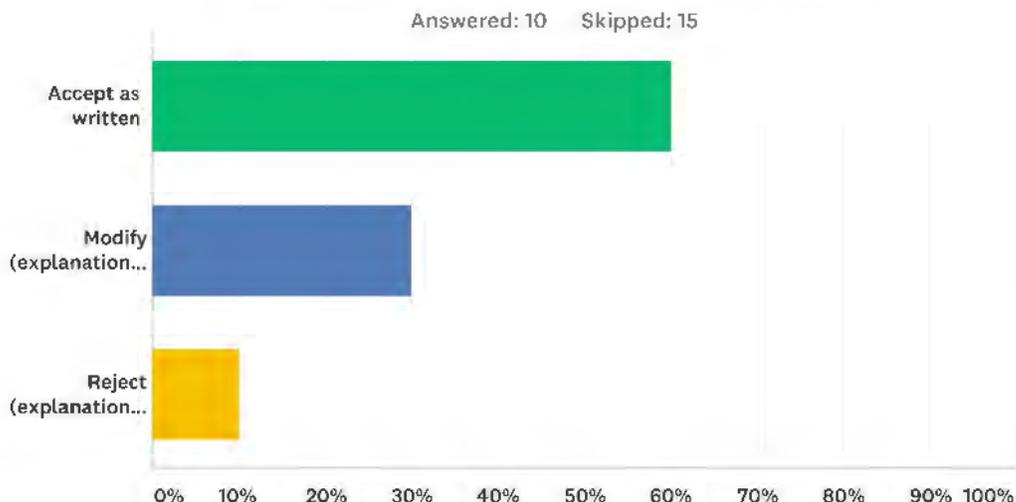
Q8 Library, Instructional Resources, and Technology: The Council proposes changes to library and instructional equipment that require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are increasingly additional online library services that provide further access to students. However, the Council continues to recognize the importance of on ground students having a physical space to access information.



Answer Choices	Responses
Accept as written	88.89% 8
Modify (explanation needed)	11.11% 1
Reject (explanation needed)	0.00% 0
TOTAL	9

#	Explanation	Date
1	Based upon being a residential or fully online program.	10/15/2016 3:34 PM

Q9 Faculty Field Preparation: The Council proposes clarifying the requirement that faculty may not teach more than three preparations in different fields at any given time for the nondegree credential level.

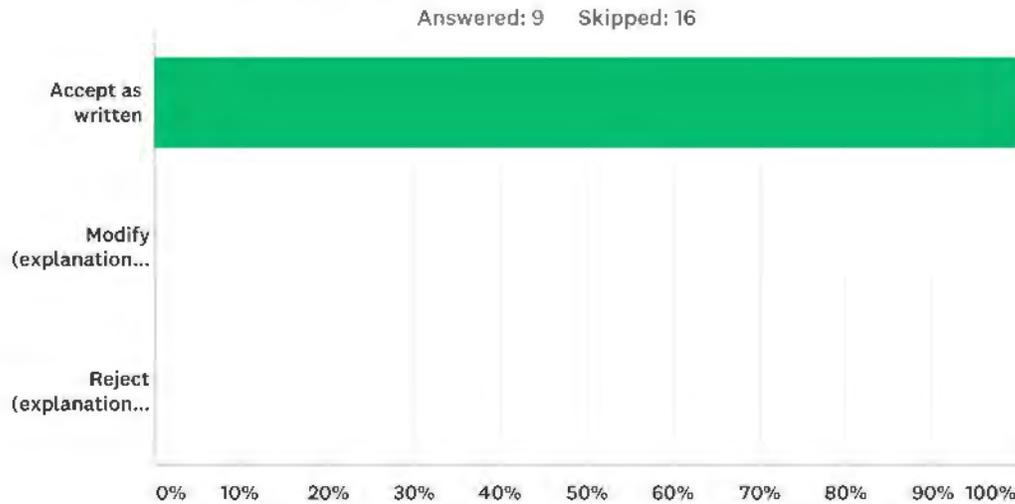


Answer Choices	Responses
Accept as written	60.00% 6
Modify (explanation needed)	30.00% 3
Reject (explanation needed)	10.00% 1
TOTAL	10

#	Explanation	Date
1	The world can be more complicated than this rigid number of three implies. I fear that the rigid number and the implied definition of "different fields" may allow an over-zealous member of a visiting team to over-apply a non-flexible requirement. I certainly cannot anticipate all the scenarios in which the rigid language of the proposal would produce an application inconsistent with the intent of the proposal. For example, a faculty member may teach two courses to a cohort of students, one of which is primarily lecture and the other of which is basically a lab applying that information. If a faculty member feels the lab requires even 5 minutes of preparation, does that count? As another example, many courses may be a mixture of lecture and laboratory, as defined in the Glossary. Together, their two preparations may amount to far less than one of the kinds of preparations seemingly implied by the proposal. Does that have to count as two preparations? Maybe NACIQI has directly stated that the standard must be three preps; however, I doubt that regionals would accept that rigidity. I think that it would be more appropriate to use language like "reasonable" rather than "three" for the number of preparations.	10/30/2016 1:40 PM
2	Three is too many. Two is my recommendation unless the instructor has taught more than three years.	10/17/2016 5:37 PM
3	This is totally dependent upon the programs. Many different fields at the nondegree credential level may have common classes. This is a decision that should be left with the campus.	10/15/2016 3:34 PM

4	<p>I wish to comment on the Defined term from section 3-2-102 as well as other similar yet inconsistent definitions and terms used causing me confusion as I strive to be compliant and follow ACICS guidelines. Terms "Preparation" 3-2-102 & 3-2-102 and 3-3-301 "Assignments" 3-2-104 and 3-3-302 "Teaching Load" 3-2-101 and 3-3-303 Where the term Teaching Load is consistent in addressing the same general topic, when we study the Preparation and Assignments sections, these seem to mean different things. that is Preparations is a specific count of courses and subjects for the non degree programs, where as Assignments gives these same specifics for the Occupational degree programs. Furthermore, is this implying three fields and 5 subjects in each thus a possible 15 subject preps in a term? Since in your example you use all business related classes. Maintaining qualified faculty is a struggle for small schools. Faculty want full time status as employees. If I am limited to 5 subjects, I face losing faculty. The definition of teaching loads being "Reasonable" can mean many things and perhaps it is better to limit the number of Fields, which I would agree with three, but reasonable latitude for an instructor restricted to one Field of study to have more than five subject Preps.</p>	9/19/2016 6:40 PM
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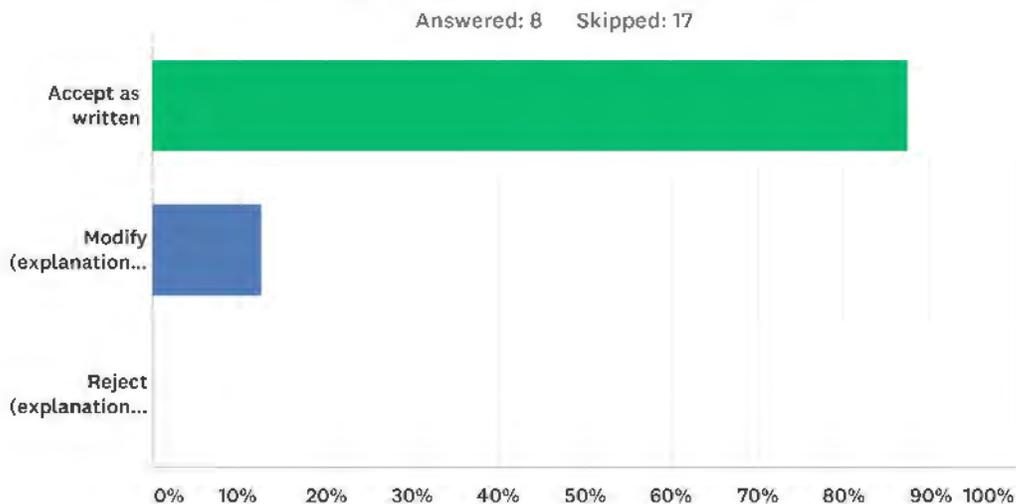
Q10 Workshop Attendance Timeframe: The Council proposes revising the requirement that the accreditation workshop must be completed 18 months prior to the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study. This will allow institutions to receive more recent revisions and updates for their renewal of accreditation visit.



Answer Choices	Responses
Accept as written	100.00% 9
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
TOTAL	9

#	Explanation	Date
	There are no responses.	

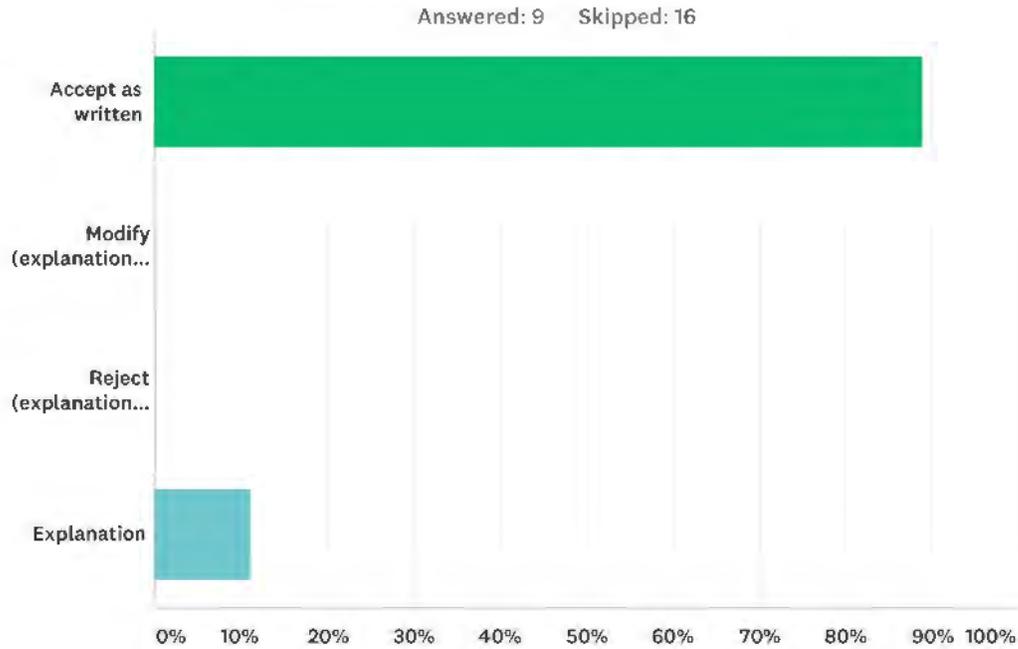
Q11 Admissions, Transfer Credit, and Catalog Disclosures: The Council proposes to revise a number of items related to the admissions, transfer of credits, and disclosure requirements in this area. Institutions must ensure that foreign transcripts of international students are validated for their equivalency to U.S. requirements for the purposes of admissions or transfer of credit. In addition, institutions may only accept transfer credits from accredited institutions that are recognized by the U.S. Department of Education or by their respective governments. Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.



Answer Choices	Responses
Accept as written	87.50% 7
Modify (explanation needed)	12.50% 1
Reject (explanation needed)	0.00% 0
TOTAL	8

#	Explanation	Date
1	Articulation agreements and other such contracts and agreements may occur within a few months of the latest catalog being published thus do we wait and publish in the next catalog. Or are you expecting the school to update the catalog every day?	10/15/2016 3:34 PM

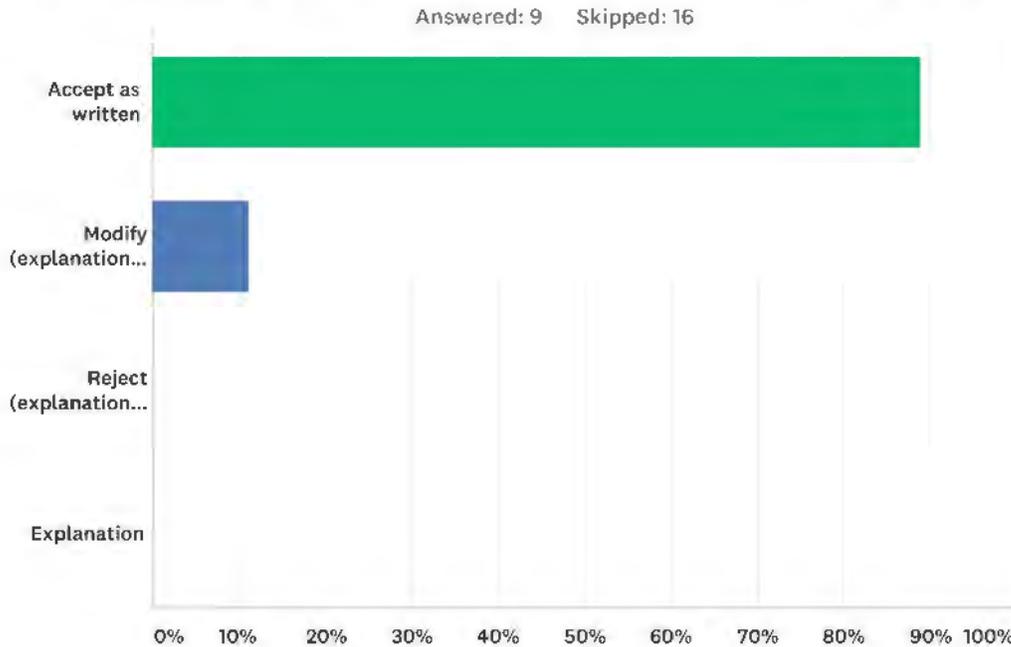
Q12 Externship Definition: The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement shall be developed that outlines the arrangement between the institution and the externship site.



Answer Choices	Responses
Accept as written	88.89% 8
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	11.11% 1
TOTAL	9

#	Explanation	Date
1	There are other beneficial ways to supervise an externship other than simply qualified faculty members. It depends on the externship purpose and all involved.	10/15/2016 3:34 PM

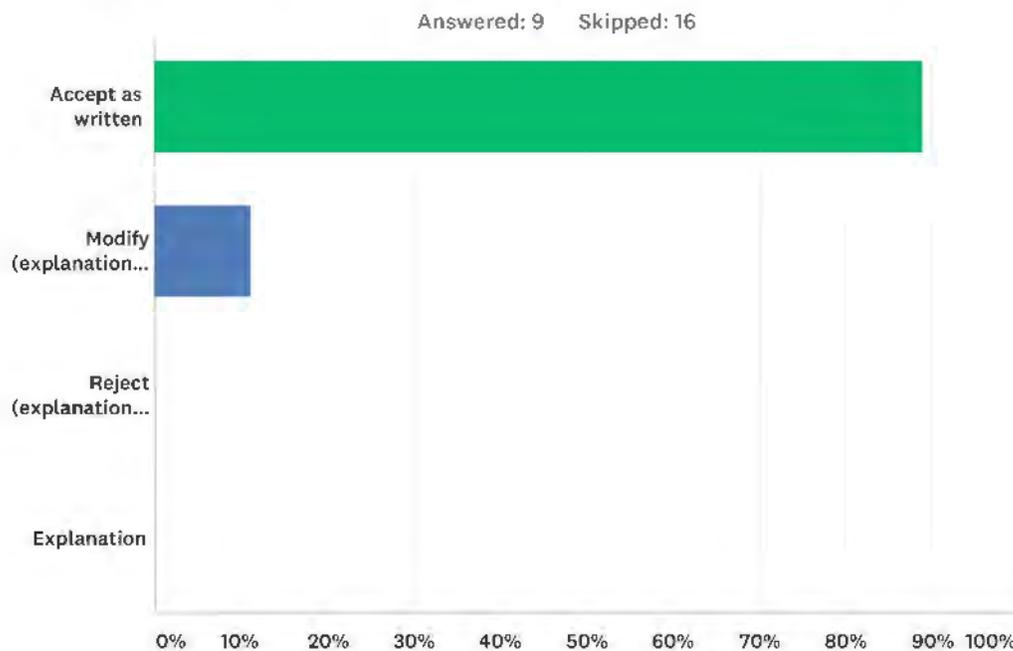
Q13 Mission Statement: The Council proposes clarifying the requirement that institutions must include a mission statement as well as a specific set of objectives that are devoted substantially to career-related education.



Answer Choices	Responses
Accept as written	88.89% 8
Modify (explanation needed)	11.11% 1
Reject (explanation needed)	0.00% 0
Explanation	0.00% 0
TOTAL	9

#	Explanation	Date
	There are no responses.	

Q14 Learning Site Definition: The Council proposes including a definitive requirement for the distance from which a learning site may be geographically separated from its managing campus. This distance is a radius of five miles. For any learning site that is currently or proposed to be further than five miles from its oversight campus, the Council will review the arrangement and determine on a case-by-case basis whether it is appropriate. All learning sites are subject to an on-site evaluation visit.



Answer Choices	Responses
Accept as written	88.89% 8
Modify (explanation needed)	11.11% 1
Reject (explanation needed)	0.00% 0
Explanation	0.00% 0
TOTAL	9

#	Explanation	Date
	There are no responses.	

The Accrediting Council for Independent Colleges and Schools

BOARD OF DIRECTORS

Minutes of the special meeting of October 3, 2016
Via Teleconference

MEMBERS PRESENT

Dr. Lawrence Leak, *Chair*
Dr. Edward Thomas, *Treasurer*
Mr. Richard Bennett
Ms. Julie Blake
Ms. Michelle Edwards
Mr. John Euliano
Dr. Fardad Fateri
Dr. Adriene Hobdy
Dr. Deborah Jones
Mr. Luis Llerena
Dr. Ruth Shafer
Mr. Roger Williams, *Interim President & CEO*

ABSENT

Mr. Roger Swartzwelder, *Chair-Elect*
Mr. Jay Fund
Dr. Rafael Ramirez-Rivera

ACICS STAFF

Ms. Perliter Walters-Gilliam

1. CALL TO ORDER

Chair Leak called the meeting to order at 1:01pm, on Monday, October 3, 2016.

2. ROLL CALL – AUGUST 1, 2016 ACICS BOARD MEMBERS

Chair Leak called the roll of the Council with nine commissioners in attendance. The presence of a quorum was declared. Two additional commissioners joined the conference call after commencement.

3. GOVERNANCE COMMITTEE REPORT

SUBJECT: Proposed revision to Bylaws - Definition of a Public Representative

ISSUE

The Council applied a more stringent definition of a “public representative” that seriously impacted its ability to find qualified individuals to serve in that capacity.

OVERVIEW:

The goal is to match the ACICS definition of “Public Member” to the DOE definition. The DOE definition includes only CURRENT employees or owners of ACICS accredited institutions as being disqualified from serving as an ACICS public member. The current ACICS definition disqualifies a person that was “employed or formerly employed” at an ACICS accredited entity. The ACICS definition is overly restrictive and does not provide the Council with a realistic chance of finding qualified public members.

DOE Definition (602.3)

Representative of the public means a person who is not—

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

CRITERIA

Proposed changes to the section of the bylaws regarding designated delegates are provided below. New language is underlined, and deleted language is ~~struck through~~.

Bylaws, Article I, Section 7

Public Representatives. Representatives of the public are persons who are interested in career education; have knowledge or experience useful to the accreditation process; are willing to contribute opinion, advice, and expertise to the endeavors of ACICS and the Council; and are not (1) employed or formerly employed by an institution or program that either is accredited by the agency or has applied for accreditation or (2) associated as members of the governing board, owners, shareholders, consultants or in some other similar capacity with an institution or program that either is accredited by the agency or has applied for accreditation; or (3) a member of any related, associated, or affiliated trade association or membership organization; or (4) a spouse, parent, child or sibling of an individual identified in paragraph (1), (2) or (3) of this definition.

Proposed ACICS Definition

Public Representatives. Representatives of the public are persons who are interested in career education; have knowledge or experience useful to the accreditation process; are willing to contribute opinion, advice, and expertise to the endeavors of ACICS and the Council; and are not (1) employed or formerly employed within the last 3 years by an institution or program that either is accredited by the agency or has applied for accreditation; or (2) associated as members of the governing board, owners, shareholders, consultants or in some other similar capacity with an institution or program that either is accredited by the agency or has applied for accreditation; or (3) ~~a member of any related, associated, or affiliated trade association or membership organization~~ a member of any trade association or membership organization related to, affiliated with, or associated with the agency; or (4) a spouse, parent, child or sibling of an individual identified in paragraph (1), (2) or (3) of this definition.

MOTION: To approve the proposed change of the Bylaws to revise the definition of a public member of the Commission.

MOVED: Euliano

SECONDED: Bennett

ACTION: Approved unanimously by the 11 commissioners present

4. NOMINATING COMMITTEE REPORT

The committee conducted, during the week of September 26th, 2016, three interviews for candidates to serve on the Commission in the near future.

1. Martha (Tibby) Loveman: recommended to complete the term vacated by Miguel Rivera. Ms. Loveman is a career nurse with extensive public service experience, having served on the ACCET board (past chair, former chair, and executive committee); conducted more than 500 visits for ACICS, ABHES and ACCET; and participated on IRC a number of times since 2011.
2. Judee Timm: recommended to fill the role that will be vacated by Commissioner Shafer at the end of the year. Dr. Timm is a professor emeritus at Monterey Junior College and has a number of publications in the area of business and international business; she is well-versed in online education; and has extensive ACICS experience –as a team chair and program evaluator.
3. Elizabeth Guinan: recommended to fill the role that will be vacated by Commissioner Llerena at the end of the year. Ms. Guinan is a former school owner with extensive school administration experience; and has served for 7 years on the ACICS Board in the past, to include being the chair of the commission. She has been the recipient of both the ACICS chair of the year and evaluator of the year awards.

MOTION: To accept the recommendation of the nominating committee to appoint Tibby Loveman to replace Miguel Rivera to serve until December

2018; and Judee Timm and Elizabeth Guinan to serve five year terms beginning January 2017.

MOVED: Euliano

SECONDED: Edwards

ACTION: Approved unanimously by the 9 commissioners present

5. INTERIM PRESIDENT & CEO REPORT

Mr. Williams provided a short summary on ACICS' intent to appeal the final action from the SDO. Under advisement from legal counsel – Allyson Baker and Ken Ingram – a short notice is being sent to the SDO to reconsider that action. The appeal is due within 30 days of the notice and ACICS is preparing the materials for that appeal.

The report required for the CHEA recognition was due on Saturday, October 1, 2016. A draft has been forwarded to Dr. Tom Cornacchia at CHEA for his review. The primary issue was the functioning, accuracy and accessibility of the performance disclosure links. The meeting with CHEA will not take place until November 21st so the expectation is that all campus links will be compliant based on continuing staff activities underway to contact schools in need of revisions.

A summary of staff changes was provided. The following staff members have left recently or will be leaving shortly:

Ian Harazduk – AVP of AID

Samantha Shellum – program analyst

Jeffery Olszewski – VP of Finance

Terrasia Covington – Senior Coordinator, Evaluator Management

Karly will take on a more managerial role to hold fill the gap.

Roles being outsourced:

Accounts Payables – temp services

IT support – temp services

Financial Review Committee – contract services

Monthly Financials – contract services

Sustaining fee: loss of \$780,000 with the closure of ITT; \$1.63M is due at the end of October. Campuses will receive an accreditation revocation letter if the fees are not received on that due date, unless mitigating circumstances are determined. An earlier communication will be sent to the institutions to remind them of this obligation and the actions that can be taken as a result of non-payment.

6. DRAFT PROJECTIONS FOR THE DECEMBER 2016 COUNCIL MEETING

- There are eight in-person hearings
- Approximately seven debarment recommendations – three previously under consideration and four new ones
- A number of hearings may be completed in advance of the actual meeting to alleviate the load – during the last week of November.

Chair Leak reminded newer commissioners of their committee chair assignments:

Commissioner Rick Bennett – Committee A
Commissioner Adriene Hobdy – Committee B
Commissioner Rafael Ramirez-Rivera – Committee C

7. GENERAL QUESTIONS & DISCUSSION

Commissioner Fateri asked about any feedback received from Herman Bounds from the Department following his observation of the last day of the August meeting. Mr. Williams summarized the follow-up interactions with Department staff, including Mr. Bounds, as being very thoughtful and objective.

8. ADJOURNMENT

There being no further business before the Commission, the meeting was adjourned by Chair Leak at 1:40 pm.



MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM Accrediting Council for Independent Colleges and Schools
DATE: January 17, 2017

The Memorandum to the Field contains final criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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1. Final Criteria Revisions

Following the August 2016 meeting, during October and December meetings, the Council reviewed specific sections of the ACICS Accreditation Criteria for the purpose of enhancing its program of review of colleges and schools offering programs that prepare students for employment in professional, technical and occupational fields. The language contained in the following section reflects content consistent with the procedure outlined in Section 1-1-200(b) of the Accreditation Criteria.

Further, at the December 2016 meeting, the Council reviewed and finalized specific areas of the ACICS *Accreditation Criteria* that had been presented to the Council through its routine systematic review process.

The ACICS *Accreditation Criteria* publication has been updated to reflect all final criteria revisions with a publication date of January 10, 2017. To review the updated version of the *Accreditation Criteria*, please visit the ACICS website at www.acics.org.>About Us>Publications>Accreditation Criteria.

The following criteria have been accepted by the Council as **final** with the effective date indicated (new language is underlined ~~deleted language is struck~~).

A. CAR PROCEDURES AND GUIDELINES – APPENDIX L

Explanation of Final Changes – Effective December 6, 2016

The Council finalized a number of changes to the standards related to student achievement and the Campus Accountability Report (CAR) which are all outlined in “Appendix L” of the Accreditation Criteria. The new Appendix includes the current student achievement rates and the applicable monitoring status and actions for campuses and programs that are not meeting acceptable student achievement indicators. The approved language more clearly defines the point at which a particular action will be taken, at the campus and program levels, including the issuance of an adverse action, a show-cause directive, a compliance warning, or reporting with restrictions against a campus or program. The Council also approved language in corresponding sections of the Criteria, such as student achievement review and Council actions at the program-level.

As communicated in the September 2016 Memorandum to the Field, if the proposed language was approved, it would be used by the Council to evaluate the data submitted in the 2016 Campus Accountability Report.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) ~~and Institutional Accountability Report (IAR)~~ to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure, ~~registration or certification~~ examination pass rates, if applicable. When this review indicates that the achievement of an institution’s students is

ACICS MEMORANDUM TO THE FIELD

January 17, 2017

below benchmark weak or deteriorating, the Council will place the campus or program on reporting and require the institution to add an improvement plan within its Campus Effectiveness Plan (CEP) and/or Institutional Effectiveness Plan (IEP). If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a compliance warning, or a show-cause directive, or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. If the Council deems an institution significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance, then it will take an adverse action. These time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement, or licensure pass rates. Institutions that are required to include a plan of student achievement improvement within their CEPs or that are determined to be out of compliance with the Council's standards for student achievement are considered to be on student achievement review. Those with campus- or institution program-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.

2-2-502. Program Show-Cause or Compliance Warning. When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure examination pass rates, the institution will be provided in writing with a show-cause or compliance warning regarding the alleged deficiency. The show-cause or compliance warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established timeframe or be taught out and discontinued or otherwise conditioned.

A program show-cause or compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program show-cause or compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3 and Appendix L, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503. The time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement or licensure pass rates.

A program that is placed on show-cause status is required to notify its current and prospective students along with the public immediately and in writing of its show-cause status through appropriate means.

2-2-503. Termination of Programs. The withdrawal of approval for a program following the issuance of a program show-cause or compliance warning or a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested

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publics. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program or who voluntarily terminate an approved program will be directed to submit a program termination plan that conforms to the following requirements. New students may not be enrolled in any program which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic progress to complete the program.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only.

To maintain approval, an institution must demonstrate active enrollment in each program of study. If an approved program is inactive for at least ~~three~~ two years, the program will be considered discontinued and will be removed from the institution's list of approved programs. To reinstate the program, the institution must initiate a new program application process. Programs that have not started within one year of the proposed start date will be surrendered. To reinstate the program, the institution must initiate a new program application process. Requests to extend a new program's proposed start date beyond one year of the initial date must be submitted to the President.

APPENDIX L - STUDENT ACHIEVEMENT STANDARDS AND CAMPUS ACCOUNTABILITY REPORTS

INTRODUCTION

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure examination pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the Accreditation Criteria requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under Section 2-1-801. Appendix L provides an overview of the Council's student achievement standards and Council actions that will be taken if the student achievement data show that a campus or program is out of compliance with these standards.

STUDENT ACHIEVEMENT STANDARDS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure examinations where applicable, and find appropriate employment.

<u>Campus-Level Student Achievement Elements (Effective 2013 Reporting Year)</u>	<u>Standard</u>	<u>Benchmark</u>
		* -
<u>Retention Rate</u>	<u>60%</u>	<u>70%</u>
<u>Placement Rate</u>	<u>60%</u>	<u>70%</u>
<u>Program-Level Student Achievement Elements (Effective 2013 Reporting Year)</u>	<u>Standard</u>	<u>Benchmark</u>
		* -
<u>Retention Rate</u>		
<u>Program length equal to or less than one (1) year</u>	<u>60%</u>	<u>70%</u>
	<u>60%</u>	<u>65%</u>
<u>Program length equal to or more than one (1) year</u>	<u>60%</u>	<u>70%</u>
<u>Placement Rate</u>	<u>60%</u>	<u>70%</u>
<u>Licensure Examination Pass Rates, where applicable**</u>		

**A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan.*

***Licensure examination pass rates apply where a licensure is required for employment. The program is also required to meet applicable licensure agency standards if higher rates are required.*

DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY

As required under Standard 2-1-801 each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before November 1 annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1st of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness (See Standard 3-1-203). In addition to the Council review of data on an annual basis, placement information is reviewed via monthly submissions, and all CAR data is subject to review and verification at any time, including during an on-site evaluation visit.

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STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS

The Council reviews student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance. The Council will follow the guidelines listed below:

<u>Year Reporting</u>	<u>Rates</u>	<u>Campus and/or Program Status*</u>	<u>Council Directed Activities</u>
<u>Current Submission</u> **	<u>60-69.9%</u>	<u>Reporting</u>	<ul style="list-style-type: none"> • <u>Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and program-level)</u> • <u>Attendance at ACICS' Retention and Placement Workshop (campus-level)</u>
	<u>50-59.9%</u>	<u>Compliance Warning</u>	<ul style="list-style-type: none"> • <u>Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus- and program-level)</u> • <u>Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (campus-level)</u>
	<u>Below 49.9%</u>	<u>Show-Cause</u>	<ul style="list-style-type: none"> • <u>Submit evidence of corrective action to the Council (campus- and program-level)</u> • <u>Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (campus-level)</u> • <u>Notification of its status to its current and prospective students (campus- and program-level)</u>
	<u>*</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (campus- and program-level)</u> • <u>Appealable to the Review Board of Appeals (campus-level)</u> • <u>Submit a Program Termination</u>

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			<p><u>Plan for ACICS approval (program-level)</u></p> <ul style="list-style-type: none"> • <u>Submit evidence of corrective action to the Council (campus- and program-level)</u> • <u>Notification of its status to its current and prospective students (campus- and program-level)</u> • <u>Attendance at ACICS' Retention and Placement Workshop (campus-level)</u>
<u>Following Year 1</u>	<u>50-59.9%</u>	<u>Show-Cause</u>	
	<u>Below 59.9%</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (campus- and program-level)</u> • <u>Appealable to the Review Board of Appeals (campus-level)</u> • <u>Submit a Program Termination Plan for ACICS approval (program-level)</u>
<u>Following Year 2</u>	<u>Below 59.9%</u>	<u>Adverse Action</u>	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Teach-out Plan and Agreement, if applicable (campus- and program-level)</u> • <u>Appealable to the Review Board of Appeals (campus-level)</u> • <u>Submit a Program Termination Plan for ACICS approval (program-level)</u>

** If the Council deems an institution or an individual program significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action. In the event that the Council finds an institution or an individual program to be out of compliance at a level that, in its judgement, can be remedied in a reasonable period of time, it will take action appropriate to the circumstances such as compliance warning or show-cause.*

***For any campus or program that receives a compliance warning or show-cause, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3 (i.e. an institution whose longest program is less than one year in length has a time frame of twelve months to come into compliance).*

DESCRIPTION OF STUDENT ACHIEVEMENT REVIEW ACTIONS

Immediate Adverse Action – The Council reserves the right to take immediate adverse action if the campus is significantly out of compliance with the Council standards with little or no chance of coming into compliance within the maximum time frame. An adverse action for a campus is a withdrawal by suspension and for a program is termination of the program, except for teach-out purposes for the currently enrolled students. An institution, in accordance with Section 2-3-403(a), will be allowed the opportunity for a hearing prior to the issuance of a withdrawal by suspension.

Show-Cause– The Council will issue a show-cause directive against any campus or program that is materially below the Council standard, as defined as below 50% for any student achievement indicator in its current submission. The show-cause directive is an action by which the Council determines that the campus and/or program is materially out of compliance and submit evidence of corrective action to the Council. In addition, the campus and/or program must provide notification of its status to all current and prospective students. As a result of being found out of compliance, the campus and/or program will have one year to bring themselves into compliance with the applicable standard.

Reporting – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure examination pass rates between 60-70%, it is considered, on student achievement review and reporting. The campus and/or program is required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP).

The Improvement Plan must include the required elements and may be reviewed during any on-site evaluation visit. In addition, those campuses must attend an ACICS Retention and/or Placement Workshop.

Compliance Warning – Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure examination pass rates between 50-60%, the Council will issue a compliance warning and the campus and/or program will be found out of compliance. A campus and/or program on compliance warning is required to evaluate, analyze and, if necessary, revise the Improvement Plan implemented while on student achievement reporting. The Council reserves the right to request submission of the evaluation and analysis of the Improvement Plan for Council review. As a result of being found out of compliance, the campus and/or program must come in to compliance within the time frame specified in Title II, Chapter 3.

Withdrawal by Suspension or Termination of a Program – If a campus does not come into compliance within the time frames specified for compliance warning or show-cause, then the Council will issue a withdrawal by suspension action. The Council will require the

campus to submit an ACICS-approved teach-out plan and teach-out agreement, if applicable. If a program does not come into compliance within the time frames specified for compliance warning or show-cause, it will be required to cease enrollment and terminate the program of study.

Data Collection and Verification – ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council reviews campus and program-level retention and placement rates and program-level licensure examination pass rates where licensure is required for employment in the state the campus is located. The CAR reporting year is July 1 to June 30 and placement is accepted through November 1st of the CAR reporting year.

Please refer to Campus Accountability Report (CAR) Guidelines for details regarding online submission of the annual report, instructions, types of information collected, and calculation formulas.

B. COUNCIL ACTION STANDARDS

Explanation of Final Changes – Effective January 1, 2017

The Council finalized changes that would streamline its current Council action procedures. A number of changes have been approved and include the following:

- *The addition of an introduction to the Accreditation Deferred or Conditioned section to clarify the Council's ability to take any of the actions so outlined, at any point in time, to include a final adverse action.*
- *The removal of "admonition" as a formal Council action.*
- *The combining of "show-cause directive" and "probation order" into one action – that of a show-cause directive. This enhanced language will require notification to the U.S. Department of Education, the students, and the public. Having been accepted, all applicable sections of the Accreditation Criteria that describe a "probation order" have been revised to a "show-cause directive".*
- *The determination that all hearings before the Council will be in writing unless an in-person hearing is specifically directed by the Council.*

Title II, Chapter 3 Council Actions -Introduction

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the Council may take are described in this chapter. Procedures available to institutions to challenge those actions and the maximum time frames for achieving final disposition of those actions by the Council also are explained. There are four general areas of Council actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

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If the Council determines that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed and may be less than the following:

- (a) twelve months, if the longest program is less than one year in length;
- (b) eighteen months, if the longest program is at least one year, but less than two years in length; and
- (c) two years, if the longest program is at least two years in length.

~~**2-3-101. Admonition.** The Council may judge an institution to be generally in compliance with the criteria, but it also may wish to call the institution's attention to one or more deficiencies that are not serious enough to preclude a grant of accreditation but that nonetheless must be corrected. In these cases, the institution will be awarded a grant of accreditation but will be admonished to correct the deficiencies. An admonition is an instruction to an institution either to initiate some prescribed practice or to refrain from some proscribed activity. An admonition does not condition the grant of accreditation, but failure to respond to it could result in a subsequent negative action.~~

2-3-200 – ACCREDITATION DEFERRED OR CONDITIONED

The Council, upon review of relevant information concerning an institution, may take any of the following actions at any time in accordance with the procedures described, up to and including a final adverse action.

2-3-210. Deferral. When Council determines there is insufficient evidence available to make a decision, ~~they~~ it may defer action until a later date pending receipt of additional information. In such cases, the Council will provide in writing the reasons for the deferral, state what the institution needs to provide with sufficient time for the institution to respond, and specify the response date. Based on the nature and/or number of identified deficiencies, the Council may require attendance of key administrators at a workshop and/or consultation.

Deferral is, in effect, “no action at this time” and is not a negative action. Therefore, deferral is not an appealable action. Neither is a deferral a final action. In all cases of deferral on renewal of accreditation of accredited institutions, the Council will extend the present grant of accreditation for a period sufficient for the institution to provide the information needed.

2-3-220. Compliance Warning. When the Council determines that an institution is not in compliance with the *Accreditation Criteria*, the Council ~~will~~ may issue a compliance warning. The institution will be provided in writing with the areas of noncompliance and will be required to demonstrate corrective action for review by ACICS.

The Council may issue a show-cause directive or a denial action/suspension order may be issued by ACICS as the result of this review reviewing a compliance warning as

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described in Section 2-3-230 or 2-3-402. Following receipt of a compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to a final adverse action.

~~When the reasons for the compliance warning are satisfied, the action may be lifted either by the President in cases where no evaluation is involved.~~

~~**2-3-230. Show-Cause Directive.** When the Council determines that an institution is not in compliance, and is unlikely to become in compliance, with the *Accreditation Criteria*, the institution will be provided in writing with the areas of noncompliance and will be invited to “show cause” why its accreditation should not be suspended or otherwise conditioned.~~

~~The opportunity to show cause before the Council will be considered to be a hearing as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to final adverse action.~~

~~When the reasons for the show-cause are satisfied, the directive may be lifted by ACICS. All institutions directed by the Council to show cause why their accreditation should not be suspended or otherwise conditioned will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.~~

~~**2-3-240230. Show-Cause Directive.** Probation Show-cause is a status that the Council may impose on an institution when it determines that if the institution does not is unable to demonstrate that it consistently materially operates in accordance with the~~

~~*Accreditation Criteria*. **2-3-241231. Imposition.** The Council will provide the institution with a written summary of the areas of noncompliance, and the institution will be required to provide evidence of The institution will be provided in writing the areas in which the institution did not materially operate in accordance with the *Accreditation Criteria*, will be required to demonstrate corrective action for review by ACICS.~~

~~Probation may be imposed by the Council either when it continues a show-cause directive after at least one hearing either in person or in writing, or after an institution has notified the Council that it intends to appeal a denial action. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to an adverse action.~~

~~The issuance of a show-cause directive may be considered the basis for a hearing, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will~~

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be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the Accreditation Criteria.

2-3-242231. Result of Probation Show-Cause. The Council will not accept any applications for new programs or new campuses from any institution on ~~probation show-cause~~ unless the institution receives approval in advance to submit such an application.

2-3-243232. Probation Vacate Show-Cause Lifted. ~~Probation does not expire automatically. Instead, the institution is obligated to demonstrate to the Council that the conditions or circumstances which initially led to the imposition of probation have been corrected before probation will be lifted. Probation may be continued even if the show-cause directive has been vacated. (See Title II, Chapter 3, Introduction). If the institution demonstrates that it has addressed the Council's concerns and is operating in compliance with the Accreditation Criteria, then ACICS may vacate the show-cause. The Council may also order a special visit at the institution's expense before vacating the probation show-cause.~~

2-3-244233. Notification of Probation Show-Cause. The Council will notify the U.S. Secretary of Education, appropriate state regulatory agencies, other appropriate accrediting agencies, and the public of its decision to place an institution on ~~probation show-cause~~. The institution is required to notify immediately ~~in writing~~ its current and prospective students along with the public of its show-cause status through appropriate means, including posting a prominent notice on its website that it has been placed on probation by its accrediting agency.

2-3-403. Procedural Guarantees for Withdrawal by Suspension.

In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- (a) Opportunity for a hearing before ACICS on all material issues in controversy.
- (b)~~(a)~~ Written prior notice of the proceedings, the charges levied, and the standards by which the institution ultimately is to be judged.
- (c)~~(b)~~ A decision on the record alone and a statement of reasons for the ultimate decision.
- (d)~~(c)~~ A right of appeal as provided in Section 2-3-600.
- (e)~~(d)~~ If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

2-3-501. Hearing Format. Hearings before the Council resulting from a show-cause directive and involving areas of noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A hearing panel of at least three commissioners will be designated by the Council to hear the presentation of the institution. The panel will present its findings and its recommended action to the full Council, which will make the final decision ~~in a~~ within the time frames specified in Title II, Chapter 3, not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is

at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the *Accreditation Criteria*.

2-3-502. Financial Hearings. All hearings before the Council for financial concerns only will be heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision ~~in a~~ within the time frames specified in Title II, Chapter 3 ~~not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.~~

C. REQUIREMENT FOR TITLE IV COMPLIANCE AUDIT

Explanation of Final Changes – Effective January 1, 2017

The Council approved language that requires all institutions that participate in Title IV programs to now submit their compliance audit along with the submission of the Annual Financial Report (AFR). ACICS will review these audits and incorporate this information, as appropriate, into its current procedures for possible action or further at-risk review.

2-1-803. Compliance Audits and Audited Financial Statements. Title IV compliance audits and Audited financial statements, certified by an independent certified public accountant, are essential instruments in the determination by ACICS of an institution's compliance with Title IV requirements and financial stability. All institutions are required to submit audited financial statements within 180 days of the end of their fiscal year. All institutions that participate in the Title IV program are required to submit the compliance audit within 180 days of the end of their fiscal year.

D. MISSION STATEMENT

Explanation of Final Changes – Effective January 1, 2017

*The Council finalized language which clarified the requirement that the institution's mission must include a mission statement **and** specific set of objectives that are devoted substantially to career-related education.*

3-1-100 – Mission: Purpose and Objectives

Every institution must have a mission which is its specific purpose for existing. The mission must include a mission statement and a set of objectives which together accomplish the purpose of the institution. ~~This mission, together with a set of objectives to accomplish it, must be summarized in a mission statement.~~ The objectives should be

devoted substantially to career-related education and should be reasonable for the program of instruction, mode of delivery, and facilities of the institution.

E. CAMPUS EFFECTIVENESS PLAN (CEP) – APPENDIX K

Explanation of Final Changes – Effective January 1, 2017

The Council has finalized and approved a series of revisions to the criteria sections focused on Campus Effectiveness. These changes include the addition of “Appendix K,” which details the guidelines and requirements for the development, implementation, and monitoring of the CEP, including all evaluation elements and monitoring processes. In addition, the Council approved the addition of program-and campus-level graduation rates to the list of required elements as this rate significantly impacts the campus’s assessment of effectiveness.

3-1-110 –CAMPUS EFFECTIVENESS

An important indication of the overall effectiveness of an ACICS-accredited campus is the degree to which it meets the mission, objectives, and educational goals it has identified. Each ACICS-accredited main and branch campus shall develop and implement a written Campus Effectiveness Plan (CEP) that is consistent with its mission and objectives. The CEP shall identify how a campus plans to assess and continuously improve its overall educational operations and how it plans to meet the educational and occupational objectives of its programs, taking into consideration its review of all critical organizational functions such as admissions, recruitment, financial aid, and student services.

For the Campus Effectiveness Plan, the following elements, at a minimum, shall be evaluated and reported for achievement of outcomes, at both the campus and program levels:

1. retention rate;
2. placement rate;
3. graduation rates;
4. the level of student satisfaction;
5. the level of graduate satisfaction;
6. the level of employer satisfaction; and
7. student learning outcomes.
8. ~~cohort default rates, if applicable.~~

3-1-111. *Development of the Campus Effectiveness Plan.* The effectiveness plan for each campus shall be described in a written CEP document that complies with Appendix K, “Requirements and Guidelines for the Campus Effectiveness Plan (CEP).”

3-1-112. *Implementation and Monitoring of the Campus Effectiveness Plan.* Each campus shall establish a process for developing, reviewing, and monitoring the Campus Effectiveness Plan (CEP). Each campus shall document that progress reports, completed

at least biannually, related to completion of activities and changes in data and information for each of the elements identified in the CEP are prepared.

3-1-113. *Evaluation of the Campus Effectiveness Plan.* Each campus shall evaluate the CEP, its goals, and the effectiveness of activities completed at least annually. The annual evaluation will involve comparison of outcomes with baseline rates and goals for each of the elements measured after completion of planned activities. Data for historical outcomes shall be maintained and included in the report to provide a basis for evaluating the achievement of goals for the various elements of operations and campus and program effectiveness over time.

APPENDIX K **Requirements and Guidelines for the** **Campus Effectiveness Plan (CEP)**

This Appendix identifies the Council's requirements for the content of a written Campus Effectiveness Plan (CEP) document. The CEP should provide information about the campus and how it measures and evaluates key elements of its operations in order to continuously improve its overall educational operations and meets its mission and objectives. The Council requires each campus to have a current CEP available that meets the requirements identified in this Appendix.

A main and branch campus may use similar language, format, and general content in CEPs, where appropriate. However, the CEP for each main and branch campus must also include information and data specific to its own campus including the characteristics and demographics of the current student population; the number of students enrolled in each program; campus and program retention, placement, and graduation rates; results of surveys to determine current student, graduate, and employer satisfaction; and student learning outcomes.

For those campuses offering programs in non-traditional modes of delivery, the plan for this mode of delivery must be integrated into the CEP and the elements evaluated to include the effect of the modality on overall outcomes. Further, the campus must also incorporate its assessment of faculty performance into its plan.

EVALUATION OF ELEMENTS IN THE CAMPUS EFFECTIVENESS PLAN (CEP)

The CEP shall, at minimum and at both the campus and program levels, report outcomes for each of the elements listed below. For each element, at the campus and program levels, as appropriate, baseline rates and levels for comparison and goals for the current evaluation period must be identified. A summary and analysis of previous performance, a rationale for the baseline rates and levels, goals, and a listing of activities that will be undertaken to achieve the goals must also be included.

1. Retention rates
2. Placement rates

Student retention and graduate placement rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than

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three years' worth of CAR data is available, data for at least one reporting period. The data and information reported for retention and placement rates must demonstrate that the campus is maintaining or improving performance each year or, if that is not the case, then the campus must provide an explanation of mitigating circumstances affecting improved outcomes. In accordance with Section 2-1-809, a specific plan to improve the retention and/or placement rate(s) for each program not meeting current Council benchmarks or standards for retention and/or placement must be included within the CEP.

3. Graduation rates

Graduation rates are based on the "scheduled to graduate" cohorts for each program offered at a campus. The graduation rates reported on the Campus Accountability Report (CAR) shall be included in the CEP for the most recent three years, or, if less than three years' worth of CAR data is available, data for a minimum of one reporting period.

4. The level of current student satisfaction.

5. The level of graduate satisfaction.

6. The level of employer satisfaction.

The level of satisfaction for each of the three elements identified above shall be determined and reported at least twice a year. For each of these three elements, the CEP must identify and describe what types of data were used to determine the level of satisfaction, how they were collected, and the target group's response rate. Graduate satisfaction should be evaluated no sooner than 30 days following and within 6 months after graduation and include both placed and non-placed graduates.

7. Student learning outcomes (SLOs).

Measuring and evaluating achievement of the SLOs are among the most important activities available to validate and confirm overall program and campus effectiveness. SLOs should be appropriately selected to reflect the nature of the academic programs offered and must include direct assessments but may also include indirect measurements (see Glossary definitions of **Direct** and **Indirect Assessment**). For campuses that offer programs for which licensure or certification is required to practice in the specific career field, pass rates shall be evaluated as a required student learning outcome.

IMPLEMENTATION AND MONITORING OF THE CAMPUS EFFECTIVENESS PLAN (CEP)

Each campus shall systematically prepare progress reports on a periodic basis as defined by the campus but no less than two times during the CEP year that document completion of activities and changes in data and information for each of the CEP elements. Activities, as described in the reports, are to be specific and measurable.

In addition to the periodic progress reports, each campus is required to conduct a comprehensive evaluation of its plan at the end of the CEP year and to incorporate the results of that evaluation into the next year's CEP, as appropriate. The next year's CEP should contain a narrative section describing or explaining the consideration and, if applicable, the incorporation of the previous year's outcomes in the formulation of the new document.

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F. LEARNING SITE DEFINITION

Explanation of Final Change – Effective January 1, 2017

*The Council finalized a definitive requirement for the distance from which a learning site may be geographically separated from its managing (main or branch) campus. This distance is a radius of five miles. Any learning site application that proposes to be further than five miles from its oversight campus will be reviewed by the Council on a case-by-case basis for appropriateness of the arrangement. For those campuses that currently have active learning sites further than 5 miles away from its oversight must comply with the new criterion language by **January 1, 2018**. **ACICS will send separate communication to these campuses with additional information on the necessary actions to be taken.** All learning sites are subject to an on-site evaluation visit.*

1-3-103. Learning Site. A learning site is a classroom extension of a main campus or branch campus that is apart from the managing location within five miles of the managing campus; offers less than 50% of a program of study; and maintains academic quality by is capable of providing providing sufficient academic and administrative oversight providing and access to all student services and instructional resources.; and maintaining required to academic quality. Learning sites that are greater than five miles from the managing campus and offer student transportation to the managing campus; or are used for delivery of distance education activity; or collaborative arrangements with other entities for specific on-site educational activity must be approved by the Council on a case-by-case basis and are subject to a quality assurance visit as specified by the Council. All learning sites are subject to an on-site evaluation visit during the managing campus renewal of accreditation evaluation visit.

G. WORKSHOP ATTENDANCE TIMEFRAME

Explanation of Final Change – Effective January 1, 2017

The Council finalized language to qualify the time-limit expectation for the workshop attendance requirement. The 18-month window is up until the submission of the evaluation visit materials (i.e. two weeks prior to the visit) rather than 18 months prior to the submission of the self-study.

2-1-100 – Accreditation Workshop Requirements

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an

accreditation workshop within 18 months prior to the final submission of the evaluation visit materials, self-study which are due two weeks prior to an on-site visit. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, and representatives of centrally controlled institutions are required to attend. Currently accredited centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.

H. EXTERNSHIP DEFINITION

Explanation of Final Change – Effective January 1, 2017

The Council proposes clarifying the requirement that the externship course must be supervised by a qualified faculty member and that a written agreement must be developed that clearly outlines the arrangement between the institution and the externship site.

Glossary of Definitions

Externship. A supervised-practical experience, under the supervision of a faculty member, that is the application of previously studied theory. ~~Under the supervision of a faculty member,~~ a written agreement shall be developed that outlines the arrangement between the institution and the externship site, including specific learning objectives, course requirements, and evaluation criteria.

I. ADMISSIONS, TRANSFER CREDIT, AND CATALOG DISCLOSURES

Explanation of Final Changes – Effective January 1, 2017

The Council finalized revisions to a number of items related to transfer of credits, and pertinent admissions and disclosure requirements for such credits. Institutions must ensure that foreign transcripts of international students are validated for their equivalency to U.S. requirements during the admissions process as well as for the evaluation of accepting transfer of credit. In addition, institutions may only accept transfer credits from accredited institutions that are recognized by the U.S. Department of Education or by their respective governments. Furthermore, transfer of credit policies and all contracts and agreements, including articulation agreements must be disclosed in the institutional catalog.

3-1-411. Admissions. The admissions policy shall conform to the institution's mission, shall be publicly stated and shall be administered as written. The following minimums apply:

- (a) The requirements for students admitted to programs leading to a certificate, diploma or degree shall include graduation from high school or its equivalent, or demonstration of

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- the student's ability to complete the program under the ability-to-benefit classification as specified under standard 3-1-303(b) and (c), as provided for by governing laws. Foreign transcripts of international students seeking admission must be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to validate equivalency with graduation from high school and eligibility to enter college or university in the United States.
- (b) It is the responsibility of the institution to maintain student records which reflect the requirements for admission of all students.
- (c) Institutions are not precluded from admitting, under different requirements, students who are beyond the age of compulsory school attendance or who may be otherwise specifically circumstanced, such as:
- (i) having financial sponsorship through contractual agreements with public or private organizations
 - (ii) having identifiable needs requiring remedial instruction as a supplement to the regular curriculums
 - (iii) participating in innovative postsecondary programs specially described to ACICS; or
 - (iv) being enrolled in individual courses not leading to an academic credential.

...

3-1-413. *Transfer of Credit.* An institution shall evaluate and consider awarding proper academic credit for credits earned only at institutions that are either accredited by agencies recognized by the United States Department of Education, or recognized by the respective government as institutions of higher education, for internationally-based institutions. The institution shall establish and adhere to a systematic method for evaluating and awarding academic credit for those courses that satisfy current program course requirements, including an evaluation of all foreign transcripts by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES), prior to the evaluation and award. Written policies and procedures must clearly outline the process by which transfer of academic credit is awarded. The institution shall ~~make public~~ disclose in its catalog its policies on transfer of credit, including a statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and if applicable, a list of institutions with which the institution has established articulation agreements.

In addition, the institution ~~shall must provide notification to students as to~~ disclose in its catalog these articulation agreements and the transferability of the credits in the programs that are offered.

...

Appendix C – Institutional Publications Requirements

At a minimum, the catalog must contain the following items:

...

21. A statement of the criteria established by the institution by which a determination is made with regard to accepting credits from another institution and, if applicable, a list of institutions with which the institution has establish articulation agreements (See Section 3-1-413).
22. A statement on the transferability of the credits in the programs that are offered (See Section 3-1-413).
23. A description of the contracts or agreements and the services to be provided, if the institution has entered into an agreement with an accredited institution, an agreement with an unaccredited institution, or an international partnership agreement (See Sections 2-2-504, 2-2-505, and 2-2-507 for additional information).

- ~~24~~24. If the institution offers degrees, the catalog must include the following information:
- (a) for occupational associate’s degree programs, identification of courses that satisfy the general education requirement and an explanation of the course numbering system;

...

J. BASIC RECORDS

Explanation of Final Changes – Effective January 1, 2017

The Council finalized clarifying language, to include definitions, surrounding record maintenance and protection. The Council updated the language on record protection and now requires institutions to determine an appropriate records maintenance and retention policy and comply with that policy. In addition, the Council now more clearly defines student records, specifically relative to admissions and advisement records, the permanent academic record, and financial aid records.

3-1-303. Records.

...

- (f) All basic records and reports pertaining to students shall be safely protected. Records shall be stored consistently in a manner that provides protection against misuse, misplacement, damage, destruction, or theft. Acceptable methods of protecting records from theft, fire, water damage, or other possible loss include electronic records management systems and software, appropriately fire-rated file cabinets (that can be and

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are locked when not being used); a central location such as a vault, the entirety of which is protected; and ~~microfilmed records, computer disk, backup tape, printout records, or other hard copies of records protectively stored off the premises.~~

(g) Certain ~~basic~~ records shall be maintained by the institution for a specified period of time. The institution shall adopt and publish a policy on the responsibility and authority of the institution to properly maintain and retain such records. At a minimum, the policy should address the following document retention requirements:

1. ~~Transcripts~~ Academic records should shall be kept maintained indefinitely permanently (see *Record, Permanent Academic* in Glossary);
2. ~~Admissions data and other advisement records should shall~~ be kept for at least five years from graduation or the last day date of attendance (see *Record, Admissions and Advisement* in Glossary);
3. Financial aid records shall be maintained according to the record retention policies and guidelines established by the funding source (see *Record, Financial Aid* in Glossary).

The institution shall comply with its published policy on records maintenance and retention.

Glossary of Definitions

Record, Admissions and Advisement. Official documents of admissions data, counseling, and advising. These documents include, but are not limited to, applications for admission or readmission (for matriculates), admission letters, denial and waitlist notifications, aptitude/assessment test scores, military records, degree audit records, transfer credit evaluations, transcripts reflecting degrees earned from other institutions, and counseling and advising correspondence.

Record, Permanent Academic. ~~The e~~Official documents on which is listed the courses attempted, grades and credit earned, and status achieved by a student of the student's scholastic progress. These documents include, but are not limited to, official transcripts; final grade reports detailing each course code, course title, and final grades for a given year and term; and any documented change to final grades.

Record, Financial Aid. Official documents regarding any grant, scholarship, or loan offered to assist the student in meeting college expenses. Documentation may vary depending upon the funding source (e.g. state or federal programs, high schools, foundations, or corporations).

Record, Student. A record (electronic or hard-copy) which is comprised of, at a minimum, a student's admissions and advisement, permanent academic, and financial aid records. A file which may contain the following: a record of the student's scholastic progress, the extracurricular activities, personal characteristics and experiences, family background, secondary school background, aptitudes, interests, counseling notes, etc.

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K. LIBRARY, INSTRUCTIONAL RESOURCES, AND TECHNOLOGY

Explanation of Final Changes – Effective January 1, 2017

The Council finalized extensive changes to the library and instructional equipment sections, for all institutions and at specific credential levels. These changes require all institutions to ensure that the resources lead to academic success and include research needs, as appropriate. In addition, the language acknowledges that there are additional online library services that provide further access to students. Notwithstanding, the Council continues to recognize the importance of the physical space needed for residential students to access information and the revisions include expectations to that effect.

3-1-800 – Library Resources and Services

The adequate provision of library resources and information services, appropriate to the academic level and scope of an institution's programs, is essential to teaching and learning. It is incumbent upon all member institutions to assess the level of library resources needed in relation to their programs and to provide a range of support to meet these needs. The size of collections and the budget allowed for library resources and services do not ensure adequacy. The quality, relevance, accessibility, availability, and provision of support services ultimately will determine the adequacy of an institution's efforts. In assessing library resources and services, ACICS requires that an institution, at a minimum, shall:

- (a) develop an adequate base core of library resources to support academic success and to meet instruction and research needs as appropriate;
- (b) ensure up-to-date means to access these resources;
- (c) develop a continuous assessment strategy for library resources and information services that includes staff and faculty;
- (d) provide adequate staff to support assessment, library development, collection, organization, and accessibility;
- (e) ensure that library services are provided to all learners, including those at nonmain campuses and those online;
- (f) provide training and encouragement for students and faculty to utilize library resources as an integral part of the learning process and as life-long learners; and
- (g) those campuses that have a residential component, must provide students a physical space on site or within close proximity to the institution in order to allow for access to library resources and services;

3-2-200 – Instructional Resources, Materials

The instructional resources, audiovisual teaching equipment, and instructional materials shall be adequate to serve the needs of the institution's educational programs. The resources shall be consistent with the institutional mission and include current print or digital titles, periodicals, professional journals, and/or full-text online resources appropriate for the institution's educational programs. There shall be evidence that appropriate instructional resources, equipment, technology, and materials are utilized to support the educational objectives.

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3-2-201. *References.* The institution shall have available and easily accessible to faculty and students standard print, digital, or online reference works appropriate to the curriculum. Major consideration will be given to the diversity of the collection including variety of volumes books, periodicals, online resources and information technology readily available to students and faculty, ~~reeency~~ their currency of publications, appropriateness, and relevance to the programs offered by the institution.

Budget (at all credentials)

3-2-204. *Budget.* Budget allocations and expenditures for instructional resources, equipment, and materials may be centralized and shall be sufficient to meet the needs and fulfill objectives of the institution's programs.

3-3-402, 3-4-402, 3-5-402, 3-6-702, 3-7-702. *Budget.* An annual library budget, appropriate to the size and scope of the institution and the programs offered, shall be established, may be centralized, and the allocation expended for the purchase of books, periodicals, library equipment, print and/or digital books, periodicals, and other resource and reference materials.

Function (at all credential levels)

3-3-403. *Function.* The library function is shaped by the mission and the educational programs of the institution. Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings. The resources shall include the study, reading, and information technology facilities necessary to make the educational programs effective. The ultimate test of the library's adequacy is determined by the extent to which its resources support all the courses offered by the institutions.

3-4-403, 3-5-403. *Function.* The library function is shaped by the mission and the educational programs of the college. Appropriate reference, research, and information resources must be made available to provide basic support for curricular and educational offerings and to enhance student learning.

3-6-703. *Function.* The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students should discover information in a variety of formats with an appropriately supporting information technology infrastructure.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, ~~as appropriate~~, information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to

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encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to ~~make~~ enhance the effectiveness of the educational programs ~~effective~~.

3-7-703. Function. The library function is shaped by the mission and the educational programs of the institution. Institutions offering master's degree programs shall provide access to substantially different library resources in terms of their depth and breadth from those required for baccalaureate degree programs. Students demonstrate the ability to define problems, access, evaluate, and analyze a variety of resources, and use retrieved information ethically.

These resources shall include bibliographic and monographic references, major professional journals and reference services, research and methodology materials, and, ~~as appropriate,~~ information technologies. The depth and breadth of the accessible library holdings shall be such as to exceed the requirements of the average student in order to encourage the intellectual development of superior students and to enrich the professional development of the faculty.

Appropriate reference, research, and information resources must be made available to enhance, augment, and support the curricular and educational offerings and to enhance student learning. The resources shall include the study, reading, and information technology facilities necessary to ~~make~~ enhance the effectiveness of the educational programs ~~effective~~.

Use and Accessibility (at all credential levels)

3-3-404. Use and Accessibility. In evaluating the use of library resources by students, consideration shall be given to accessibility and to methods used by the faculty to encourage the use of these resources by students. Records of physical and/or online circulation and inventory shall be current and accurate.

Physical and/or online library materials and services must be available at times consistent with the typical student's schedule in ~~both day, and evening,~~ and online programs. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. If online resources are utilized, an appropriate number of terminals and/or wireless access shall be provided for student use. Interlibrary agreements are not substitutes for an institution's library, but rather a means to supplement the institution's holdings in limited areas. In determining the appropriateness of such agreements, consideration will be given to the uniqueness of the lending library's collection, provisions for interlibrary loans, and the degree of accessibility to the students.

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3-4-404, 3-5-404, 3-6-704, 3-7-704. Use and Accessibility. The faculty should inspire, motivate, and direct student usage of the library resources. The library's adequacy ultimately is determined by the extent to which physical and/or online resources including full-text resources support all the courses offered by the institution.

For library resources, the Dewey Decimal System, Library of Congress classification system, or other appropriate system of classification should be used. Records of physical and/or online circulation and inventory shall be current and accurate and must be maintained to assist staff and faculty in evaluating the adequacy and utilization of the physical and/or online resources including full-text holdings.

Physical and/or online, full-text library materials and services must be available at times consistent with the typical student's schedule in both day, and evening, and online programs. If online or computer based resources are ~~computer software~~ is utilized on site, a sufficient number of terminals and/or wireless access shall be provided for student use. If interlibrary agreements are in effect, provisions for such use must be practical and accessible and use must be documented. In determining the appropriateness of such agreements, consideration will be given to the nature of the participating library's collection, provisions for interlibrary loans, and the degree of accessibility to the students. A college's library must contain, at a minimum, a core collection of physical and/or online resources including full-text reference materials appropriate for the offerings of the institution.

Holdings (at all credential levels)

3-3-405. Holdings. The institution shall have available and easily accessible standard physical and/or online reference works, professional journals, and current periodicals appropriate to the curriculum. Consideration also shall be given to supplementary library resources contracted by the institution and online resources available to its student body.

3-4-405, 3-5-405. Holdings. A collegiate library shall contain up-to-date physical and/or online resources including full-text titles appropriate for the size of the institution and the breadth of and enrollment in its educational programs. The library collection shall include holdings on the Humanities, Arts, Social Sciences, and Sciences, including mathematics; magazines and essential professional journals and periodicals; ~~and, when appropriate, online data networks and retrieval systems, CD-ROMs, and interactive research systems~~ that support all of the course offerings of the institution.

3-6-705. Holdings. The library shall support the academic programs and the literacy, intellectual, and cultural development of students, faculty, and staff; shall provide current and appropriate physical and/or online, full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; ~~shall provide, when appropriate, on-line data networks and retrieval systems, CD-ROMs, and interactive research systems;~~ and shall be capable of supporting an understanding of the methods and principles of scholarly research and how to use information ethically ~~and/or scholarly research~~ at the graduate level.

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3-7-705. Holdings. The library shall support the academic programs and the intellectual and cultural development of students, faculty, and staff; shall provide current and appropriate physical, digital, and/or online full-text resources for the size of the institution and the breadth of and enrollment in its educational programs; ~~shall provide, when appropriate, physical and/or on-line, full-text data networks and retrieval systems, CD-ROMs, and interactive research systems;~~ and shall be capable of supporting scholarly research at the ~~graduate~~ doctoral level.

Staffing (at all credential levels)

3-4-401, 3-5-401. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one who holds a bachelor's or master's degree in library or information science or a comparable program, or state certification to work as a librarian, where applicable, or, for foreign institutions, who holds a bachelor's or master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in documented annual professional growth activities.

During library hours that are scheduled and posted, there shall be a trained individual on-site who is assigned to oversee and to supervise the library and to assist students with library and information services. This individual shall be competent and technologically literate to use and to aid in the use of the online and computer based library ~~technologies~~ ~~and~~ resources.

3-6-701, 3-7-701. Staff. A professionally trained individual shall supervise and manage library and instructional resources, facilitate their integration into all phases of the institution's curricular and educational offerings, and assist students in their use. A professionally trained individual is one with special qualifications to aid students in research and who holds a M.L.S. degree or the equivalent, or, for foreign institutions, who holds a master's degree recognized as appropriate for the position by its government or higher education authority. The institution must provide evidence that the degree is from an institution accredited by an agency recognized by the United States Department of Education. If the degree is from an institution outside of the United States, the institution must be recognized by its government as an institution of higher education or be evaluated by a member of the Association of International Credentials Evaluators (AICE), the American Association of Collegiate Registrars and Admissions Officers (AACRAO), or

the National Association of Credential Evaluation Services (NACES) to determine the equivalency of the degree to degrees awarded by institutions in the United States. ACICS, if unable to determine qualifications, may require the translation and/or evaluation of transcripts in languages other than English. The professionally trained individual must participate in annual documented professional growth activities.

There shall be a professionally trained individual on duty for sufficient hours, as published by the institution, to support the programs and to assist students with library functions and research. This individual shall be competent both to use and to aid in the use of the physical, computer based, digital and online library technologies and resources.

Appendix H- Principles and Requirements for Nontraditional Education

Resources and Equipment

(b) The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If the majority of a student's classes are online, these resources must include at a minimum access to a virtual library collection of program-related books, journals, and periodicals, and access to virtual library and information technology services.

L. FACULTY FIELD PREPERATION

Explanation of Final Changes

The Council revised the restriction of the number of preparations that can be taught by a faculty member at the non-degree level, given confusion on the interpretation of an "academic term" as a result of variation of application by institutions.

3-2-102. Field Preparation. Assignments requiring more than three preparations in different fields (e.g., allied health, business, criminal justice ~~secretarial studies, business administration, data processing~~) shall not be given to an instructor at any given time during one academic term.

2. For Information Only

A. ACICS BYLAWS – GENERAL PROVISIONS AND DEFINITIONS

This revision became effective on October 3, 2016.

The ACICS Board of Directors approved a revision to the bylaws as it relates to the definition of a public representative and the criteria by which they would not be able to serve on the Council.

BYLAWS ARTICLE I, Section 7

Public Representatives. Representatives of the public are persons who are interested in career education; have knowledge or experience useful to the accreditation process; are willing to contribute opinion, advice, and expertise to the endeavors of ACICS and the Council; and are not (1) employed or formerly employed within the last 3 years by an institution or program that either is accredited by the agency or has applied for accreditation; or (2) associated as members of the governing board, owners, shareholders, consultants or in some other similar capacity with an institution or program that either is accredited by the agency or has applied for accreditation; or (3) ~~a member of any related, associated, or affiliated trade association or membership organization~~ a member of any trade association or membership organization related to, affiliated with, or associated with the agency; or (4) a spouse, parent, child or sibling of an individual identified in paragraph (1), (2) or (3) of this definition.

B. MEMORATUM ON DOCTORAL PROGRAMS

At the December meeting, the Council voted unanimously to place a moratorium on any further acceptance of institutions offering programs above the master's degree level or program applications beyond those previously approved above the master's. The Council's ultimate goal and immediate direction is to begin an orderly phase-out of the doctoral programs.

C. ACICS AWARE WEBINAR

An AWARE webinar will be held on **Wednesday, January 18 at 12:30 pm**. This webinar will focus on information presented in the January 2017 Memorandum to the Field. ACICS looks forward to explaining these final Criteria changes and answering any related questions. In an effort to be efficient with the limited time dedicated to the session, please send questions to Ms. Perliter Walters-Gilliam at pwgilliam@acics.org, so that the responses can be prepared and shared during the webinar.

D. ACICS PLACEMENT VERIFICATION PROGRAM (PVP) ENHANCEMENTS

Updates have been made to the PVP process to include revised e-mails which now allow for graduates and employers to qualify (detail) how the graduate received a benefit from their credential to enhance their **current** position. The spreadsheet has also been updated to include the scheduled to graduate cohort.

ACICS has established a process for reviewing any placements that were marked as invalid by ACICS that a campus would like to appeal. If an institution feels that the placement is in accordance with the guidelines and therefore valid, they may submit the placement and all supporting documents to the review committee at pvpreview@acics.org. The committee will review the documentation submitted and make a **final** decision on the validity of the placement.

An informational webinar will be held **at 2:00pm on Wednesday, January 18, 2017** at the conclusion of the AWARE webinar. If you have any questions concerning the PVP, please email Ms. Karly Zeigler at kzeigler@acics.org so that she compile and prepare appropriate responses. **Please note that campus-specific questions/concerns and situations will not be discussed during the webinar.**

E. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities, to include the new *Accreditation Criteria* publication. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

NOTE: The institutional ACICS ID should be used on all correspondence to and from ACICS. If you have questions about your ID code, please send an email to ebiz@acics.org.

If you have any questions about the memorandum to the field, please contact:

Ms. Karly Zeigler
Manager of Institutional Compliance
kzeigler@acics.org

Ms. Perliter Walters-Gilliam
Vice President – Accreditation
pwgilliam@acics.org

The AWARE Webinar Will Begin Momentarily

- Have questions? Submit them using the Go-to-Webinar dialogue box.
- Q&A are archived on our website under Frequently Asked Questions under the Events and Workshops tab!



The AWARE Webinar Will Begin Momentarily

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ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

AWARE Webinar

January 18, 2017
12:30-2:00pm EST

ACICS Webinar Announcing, Relating & Explaining
The January 2017 Memorandum to the Field



Today's Presenters

- **Roger J. Williams**, Interim President
- **Perliter Walters-Gilliam**, Vice President - Accreditation
- **Terron King**, Senior Manager, Institutional and Program Review
- **Karly Zeigler**, Manager, Institutional Compliance

WELCOME!



Agenda

- **Topic I: *Final Criteria Revisions & Changes***
- **Topic II: *For Information Only***
- **Questions and Comments**





ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Available at www.ACICS.org

To view the Memo:

> Council Actions

>> Memorandum to the Field

>>> January 2017

The screenshot shows the ACICS website navigation menu with the following items: Accreditation, Council Actions, Students, Evaluators, Events/Workshops, and News. The 'Council Actions' menu is expanded, showing a list of items: Memorandum to the Field, Initial Applicant Institutions, Institution Closings, Accreditation Conditioned, Voluntary Withdrawal, Evaluation Schedule, Adverse Actions, Institutions on Show-Cause, and Program Approval Withdrawn. The 'Memorandum to the Field' page is displayed, featuring a breadcrumb trail 'Home > Council Actions > Memorandum to the Field', social media sharing icons, and a paragraph of text: 'After each Council meeting, ACICS staff will publish a memorandum to ACICS-accredited institutions and other interested parties which includes final criteria changes, proposed criteria changes, and general information for the membership on a number of topics.' Below the text is a list of dates: 2017 January, 2016 September, May, and April.

TOPIC I:

**FINAL CRITERIA REVISIONS
& CHANGES**



Final Criteria Changes & Revisions

- **CAR Procedures and Guidelines and Appendix L**
- **Council Actions Standard**
- **Requirement for Title IV Compliance Audit**
- **Mission Statement**
- **Campus Effectiveness Plan and Appendix K**



Final Criteria Changes & Revisions

- **Learning Site Definition**
- **Workshop Attendance Timeframe**
- **Externship Definition**
- **Admissions, Transfer Credit, and Catalog Disclosures**
- **Basic Records**
- **Library, Instructional Resources, and Technology**
- **Faculty Field Preparation**



CAR Procedures and Guidelines

Final Changes Effective December 6, 2016

Sections 2-1-809, 2-2-502, and 2-2-503 and Appendix L

A number of changes to the standards related to student achievement and the Campus Accountability Report (CAR) were finalized. Language in corresponding sections of the Criteria, such as student achievement review and Council actions at the program-level were also revised and approved.

Key components:

- There is a clear defined point at which a particular action will be taken, at the campus and program levels.
- If an institution is determined to be significantly out of compliance relative to student achievement outcomes, the Council will take an adverse action.
- Campuses directed to show-cause why a program's approval or its accreditation should not be withdrawn or otherwise conditioned will be required to immediately and publically notify students and the public.



CAR Procedures and Guidelines (cont'd)

Final Changes Effective December 6, 2016

Sections 2-1-809, 2-2-502, and 2-2-503 and Appendix L

Key components (cont'd):

- The approval of a program will be withdrawn if its performance is materially out of compliance – program termination plan will be required; no new admissions
- An institution's accreditation may be withdrawn by suspension or otherwise conditioned if its performance is materially out of compliance at any point.
- Criteria changes were applied to 2016 CAR submission.



Council Actions Standard

Final Changes Effective January 1, 2017

Section 2-3-100 through Section 2-3-502

The Council finalized changes that streamline its current Council action procedures.

Key components:

- The addition of an introduction to the Accreditation Deferred or Conditioned section to clarify the Council's ability to take any of the actions so outlined, at any point in time, to include a final adverse action.
- The removal of "admonition" as a formal Council action.
- The combining of "show-cause directive" and "probation order" into one action – that of a show-cause directive. New criteria require notification to the U.S. Department of Education, the students, and the public.
- The determination that all hearings before the Council will be in writing unless an in-person hearing is specifically directed by the Council.



Requirement for Title IV Compliance Audit

Final Changes Effective January 1, 2017

Section 2-1-803

The Council approved changes that will require all institutions that participate in Title IV programs to submit their compliance audit along with their Annual Financial Report (AFR) for review by ACICS.

Key components:

- Addition of language requiring the Title IV compliance audit.
- May trigger additional review or at-risk assessment.



Mission Statement

Final Revisions Effective January 1, 2017

Section 3-1-100

The Council finalized language which clarified the requirement for an institution's mission.

Key component:

- The mission must include a mission statement **and** a set of objectives that are devoted substantially to career-related education.



Campus Effectiveness Plan and Appendix K

Final Changes Effective January 1, 2017

Section 3-1-110 through Section 3-1-113 and Appendix K

The Council finalized the number of required elements for evaluation as well as the addition of an Appendix K which provides detailed guidelines on the development, implementation, and monitoring of the plan.

Key components:

- Graduation rate was added as a **required** element.
- Progress reports must be completed at least biannually.
- Non-traditional modes of delivery must be integrated in the Plan and analyzed.
- The level of graduate satisfaction is to be evaluated no sooner than 30 days and within 6 months following graduation for both placed and non-placed graduates.
- Licensure pass rates (if applicable) **must** be evaluated as a required student learning outcome.



Learning Site

Final Revisions Effective January 1, 2017

Glossary

The Council finalized a definitive requirement for the distance from which a learning site may be geographically separated from its managing (main or branch) campus.

Key components:

- A learning site is to be located within a 5-mile radius of the managing campus.
- Those located more than five miles may be considered for approval on a case-by-case basis, if sufficient justification/rationale is provided.
- Those campuses that currently have active learning sites further than 5 miles away from their oversight must comply with the new criterion language by **January 1, 2018**.



Workshop Attendance Timeframe

Final Revisions Effective January 1, 2017

Section 2-1-100

The Council finalized language to qualify the time-limit expectation for the workshop attendance requirement.

Key component:

- Campus representatives must attend the workshop within 18 months of the submission of the evaluation visit materials instead of the self-study.
- Evaluation visit materials are due two weeks prior to the visit.



Externship Definition

Final Revisions Effective January 1, 2017

Glossary

The Council clarified that the externship course be supervised by a qualified faculty member and that a written agreement must be developed that clearly outlines the arrangement between the institution and the externship site.

Key components:

- The practical experience must be under the supervision of a qualified faculty member, not the agreement.



Admissions, Transfer Credit, and Catalog Disclosures

Final Changes Effective January 1, 2017

Sections 3-1-411, 3-1-413 and Appendix C

The Council finalized changes to admissions criteria, transfer credits, and disclosure requirements.

Key components:

- Foreign transcripts accepted as a basis for admission must be evaluated for equivalency by a member of AICE, AACRAO, or NACES.
- Credits considered for transfer must be earned at accredited institutions or from international institutions recognized by their respective government as an institution of higher education.
- Language in catalog must be clear regarding requirements for acceptance of transfer credits and any articulation agreements.



Basic Records

Final Revisions Effective January 1, 2017

Sections 3-1-303

The Council finalized revisions that clarify and update language regarding appropriate record keeping. Glossary definitions were also added to define different types of records.

Key components:

- Clarification of the definition of student records.
- Addition of electronic records management systems and software as acceptable methods of protecting records.
- Addition of requirement for the publication and adoption of a policy for properly maintaining records which addresses academic records, admissions and advisement records, and financial aid records.



Library, Instructional Resources, and Technology

Final Revisions Effective January 1, 2017

Sections 3-1-800, and all credential levels for budget, function, use and accessibility, holdings, staffing, and Appendix H

The Council finalized changes to all applicable Criteria sections related to this area to ensure that resources lead to academic success to include research needs, as appropriate.

Key components:

- Institution must provide up-to-date means to access resources and a continuous assessment strategy should include faculty and staff.
- Resources for online students must include to access to a virtual library collection of program-related materials as well as virtual library services.
- All residential campuses must provide a physical space to allow for student access to library resources.



Faculty Field Preparation

Final Revisions Effective January 1, 2017

Section 3-2-102

The Council revised the restriction on the number of preparations that can be taught by a faculty member at the non-degree level.

Key component:

- Instead of “academic term” for the restriction on number of preps; it’s now at “any given time”.



TOPIC II: FOR INFORMATION ONLY



For Information Only

- **ACICS Bylaws – Definition of Public Representative**
- **Moratorium on Doctoral Degrees**
- **Placement Verification Program (PVP) Enhancements and Updates**



Definition of Public Representative

For Information Only – Effective October 2016

Article I, Section 7 of Bylaws

The ACICS Board of Directors approved a revision to the bylaws as it relates to the definition of a public representative and the criteria by which they would not be able to serve on the Council.

The representative cannot be

- employed or formerly employed within the last 3 years by an institution or program that either is accredited by the agency or has applied for accreditation.
- a member of any trade association or membership organization related to, affiliated with, or associated with the agency



MORATORIUM ON DOCTORAL PROGRAMS

For Information Only

- Moratorium on any further acceptance of institutions offering programs above the master's degree level or program applications beyond those previously approved above the master's.
- The Council's ultimate goal and immediate direction is to begin an orderly phase-out of the doctoral programs.



ACICS PLACEMENT VERIFICATION PROGRAM (PVP) ENHANCEMENTS

For Information Only

- Updates have been made to the PVP process to include revised e-mails which now allow for graduates and employers to qualify (detail) how the graduate received a benefit from their credential to enhance their **current** position.
- An appeals process have been established which allows campuses to petition the decision of the review team.
- Informational webinar will follow the AWARE webinar to discuss changes in detail and clarify expectations.



Question & Answer



Please type in any questions or comments you might have!





ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Available at www.ACICS.org

To view the Slides:

> Events/Workshops

>> Webinars

>>> AWARE

The screenshot shows the ACICS website interface. At the top, the ACICS logo and name are displayed. Below the logo is a navigation menu with links: Home, About Us, Accreditation, Council Actions, Students, Evaluators, Events/Workshops, and News. The 'Events/Workshops' link is highlighted with a red arrow. A dropdown menu is open under 'Events/Workshops', showing options: ACICS Centennial, 2012 Workshop Schedule, Registration Instructions, Workshop Descriptions, Webinars, Calendar of Events, Past Annual Meetings, and Visiting Washington, DC. The 'Webinars' option is highlighted with a red arrow. Below the navigation menu, the 'Events/Workshops' section is active, displaying a list of links on the left: ACICS Centennial, Panel Discussion Webcast, About the ACICS Centennial, Centennial Home, Stories of the Centennial, Upcoming Events, Community Service Project, Resources to Download, 2012 Workshop Schedule, Registration Instructions, Workshop Descriptions, Webinars, Calendar of Events, Past Annual Meetings, and Visiting Washington, DC. The 'Webinars' link is highlighted with a red arrow. The main content area shows the 'Webinars' page, which includes a title 'Webinars', a description: 'Webinars are free informational seminars that are accessed over the Internet. The sessions are designed for schools but will also be of interest to evaluators and others.', and a list of 'Available Webinars': Evaluator Training, AWARE, IEP Webinar, Self-Study Submission, and Archived Webinars. Below this is a section for 'Evaluator Training Modules' with a paragraph of text: 'Please note registration for the Evaluator Workshop has changed. For more information, visit Step 5 of Becoming an Evaluator. Effective January, 2010, evaluator training consists of three pre-recorded Go-To-Webinar modules and one live two hour Go-To-Webinar. The final two hour live Go-To-Webinar is by invitation only.'



Feedback/Participation from the Field



Although there are no proposed Criteria Changes at this time, the Council will be holding its Policy Meeting in February and would welcome your input on sections/topics needing additional review (kzeigler@acics.org)



FEBRUARY 2017 ACICS COUNCIL MEETING
 SAN JUAN MARRIOTT RESORT AND STELLARIS CASINO
 SAN JUAN, PUERTO RICO
 FEBRUARY 9-10, 2017
 AGENDA

THURSDAY, FEBRUARY 9, 2017

Schedule	Event	Topic & Presenters	Subtopic/Criteria	Item/Page	Location
8:00 – 9:00 AM	<i>BREAKFAST</i>				Ballroom I
9:00 – 12:00 NOON	Call to Order Introduction	Chair's welcome and comments (Edwards)		No Attachment	Ballroom I
		President's welcome and comments (Williams)		No Attachment	
	Preliminary Discussion Items	Consideration for Campus- Level Show-Cause Actions (Gilliam, Morrison)			
		Summary of CHEA Decision (Williams)	• Reporting Expectations	No Attachment	
	December 2016 Meeting Follow Up	IEC Recommendations from Student Achievement Review (Edwards, King)			
		Licensure Information Requirements – Validation Challenges (King)			
		Continued Waivers for Program <10 (Beginning or Ending Population) (King)		No Attachment	
Policy Discussion Items	Distance Education (King)	2-2-106			
12:00 – 1:00 PM	<i>LUNCH</i>				Condado Terrace

FEBRUARY 2017 ACICS COUNCIL MEETING
 SAN JUAN MARRIOTT RESORT AND STELLARIS CASINO
 SAN JUAN, PUERTO RICO
 FEBRUARY 9-10, 2017
 AGENDA

1:00 – 5:00 PM	Policy Discussion Items	Council Hearing Procedures (Morrison)	2-3-500		Ballroom I
		Review Board Appeal Process (Morrison)	2-3-602		
		Expenses of Appeal Board (Morrison)	2-3-608		
		Revocation (Morrison)	2-3-401(b)		
		Procedural Guarantees for Withdrawal by Suspension (Morrison)	2-3-403(a)		
		Substantive Change Consideration (Morrison)	2-2-101(g) & 2-2-121(a)(i)		
		Renewal of Accreditation - Submission of Application (Zeigler)	2-1-300		
		Renewal of Accreditation – Application (Submission of Significant Changes) (Zeigler)	2-1-301		
		Branch Campus Grant Lengths (Zeigler)	2-1-701 & 2-1-702		
		Revision of Change of Ownership/Control Action (King)	2-3-302		

FEBRUARY 2017 ACICS COUNCIL MEETING
 SAN JUAN MARRIOTT RESORT AND STELLARIS CASINO
 SAN JUAN, PUERTO RICO
 FEBRUARY 9-10, 2017
 AGENDA

FRIDAY, FEBRUARY, 10, 2017

Schedule	Event	Topics & Presenters	Subtopic/Criteria	Item/Page	Location
8:00 – 9:00 AM	<i>BREAKFAST</i>				Ballroom I
8:30 - 12:00 NOON	Policy Discussion Items	Unannounced Visit Fees (Zeigler)	Appendix B		Ballroom I
		Advertising – Third Party Services (Zeigler)	Appendix C		
		Other Denial Actions not Affecting Accreditation (King)	2-3-303		
		President serving as Secretary Number of Public Representatives (Zeigler)	Bylaw Article II, Section 3 Article III, Section 1		
	Procedural Discussion Items	Commissioner Participation on Visits (Zeigler/Edwards)			Ballroom I
		Two-Visit Cycle Schedule (Zeigler)			
		Reporting Late Fees - CAR and AFR (King)			
Editorial Items	Updating/Revision of Language (Bennett)	3-1-202, 3-1-400, 3-1-420, etc.			
12:00 – 1:00 PM	<i>LUNCH</i>				Condado Terrace

Discussion or Final/Editorial	Criteria	Objective	Proposed Change(s)
Discussion	2-3-500 Council Hearing Procedures and review of other related Criteria	Simplify procedures for in-writing show-causes and eliminate some of the formalities	-Add language for in-writing show cause "review" rather than hearing. -Notification of acceptance in (a) moved to (c). - Incorporate procedural change to charge separately for court reporter and add to the second to last sentence of bullet (c), "...the cost of which will be compensated by the institution."
Discussion	2-3-602 Review Board Appeal Process	Clean up language of appeal board to reflect actual and necessary practices.	-Remove reference to 15 members change to "shall consist of fifteen (15) persons....experience in accreditation, who are appointed to three-year terms.
Discussion	2-3-608 Expenses of Appeal Board	Remove statement on returning any leftover deposited monies.	Remove the last sentence stating "This deposit shall be...returned to the institution."
Discussion	2-3-401 (b) Revocation	Add language for actions to be taken when an institution fails to respond to a show-cause directive.	Add on to (b) " <u>An institution fails to respond to a show-cause directive within 10 days or an institution whose accreditation has been summarily suspended does not...</u> "
Discussion	2-3-403 (a) Procedural Guarantees for Withdrawal by Suspension	Eliminate opportunity for a hearing for withdrawals by suspension. Unnecessary as a second review by Council would be redundant and right of appeal available in (d).	Delete item (a) "Opportunity for a hearing before ACICS on all material issues in controversy.
Discussion	2-2-101(g) & 2-2-121 Substantive Change	Add consideration of a 25% or more decrease in the number of clock or credit hours.	Add a <u>or decrease</u> to each criterion defining a substantive change as a 25% increase in the number of clock or credit hours.
Discussion	Appendix B Unannounced Visit	Edit criterion to account for assessed fee of an unannounced.	Under "Expenses": "A <u>flat</u> fee will not be assessed for this visit, but each institution will be billed for expenses incurred during the visit.

Discussion or Final/Editorial	Criteria	Objective	Proposed Change(s)
Discussion	2-1-300 Renewal of Accreditation	Remove specified dates for renewal application and self-study to allow for current practice of being closer to visit date.	Remove September 30 th and December 1 st dates and change to 10 weeks prior to the start of the assigned review cycle for both.
Discussion	2-1-301 Application	Add language to prohibit any institutional changes following submission of initial and renewal applications. This will allow for a more accurate review.	Add a sentence to the first paragraph stipulating that no (significant) changes may be made to the institution between the submission of the self-study and the time of the visit. -Delete reference to centrally controlled institutions.
Discussion	2-1-701 and 2-1-702	Remove reference to different grant lengths for separate campuses within an institution.	Change the first line of 2-1-701 to "The Council determines the grant lengths of each campus <u>institution</u> that is accredited by ACICS. Remove 2-1-702.
Discussion	2-3-302	Clarify language to show appropriate actions for change of ownership applications OR propose that this be removed altogether and changed to a special visit following a change of ownership	-Change the heading to "Denial of Renewal of Accreditation or <u>Reinstatement following a Change of Ownership</u> . -Alternatively, since accreditation is reinstated upon approval(?), should this be eliminated and instead conduct special visits.
Discussion	2-3-303 Other Denial Actions Not Affecting Overall Accreditation.	-Add other possible denial actions that may occur to include all of the substantive changes. -Propose that branch-to-freestanding be removed altogether.	-Remove language for a branch-to-freestanding campus and add substantive changes. "An institution that objects to a Council decision to deny an application for (insert substantive changes) branch-to-freestanding status or new program inclusion will be given the opportunity to present its case." -Should we allow for a branch-to-freestanding?
Discussion	Appendix C	-Clarify the meaning of what	-Identify the meaning of the last sentence under ADVERTISING

Discussion or Final/Editorial	Criteria	Objective	Proposed Change(s)
		advertising 3 rd party services might entail and whether this is still a relevant criterion.	(5) "A disclosure must be made for services which are funded by third parties that are offered at no cost to students." Provide clarity if necessary.
Discussion	2-2-106 Distance Education	Clean up/clarify procedure and language for distance education approval.	Identify appropriate approval process for distance education. Must it be initiated through an existing program rather than as a new program?
Discussion	Waivers for Programs with < 10.	Less than 10 in beginning pop, ending pop, grads/completers, or total number of enrollees?	Now that we are grouping by cohort, the suggestion would be to grant waivers to cohorts of less than 10.
Final-Bilaws	Article 11, Section 3	Remove language appointing president as treasurer and instead make it an appointed position.	
Final-Bilaws		Change the number of public members to be the majority as a measure to increase objectivity on the Council.	Change to 7 public members rather than 6.
Editorial	3-1-202, 3-1-400, 3-1-420, etc.	Update language.	Replace "integrity" with another term, Relations with Students changed to Student Relations, Standards of Satisfactory Academic Progress, remove centrally controlled, change doctorate to doctoral
Editorial	All	Reorganize the Criteria for better navigation.	Reorganize the Criteria to be structured by content area, then credential level vs. the current structure.
Procedural	Commissioner Visit Participation	Commissioners encouraged to participate on visits to gain further knowledge of processes and institutional issues.	Previously it has been the practice to not invite commissioners on visits.

Discussion or Final/Editorial	Criteria	Objective	Proposed Change(s)
Procedural	Visit Cycle Schedule	Consider a change to a 2-cycle-a-year system to increase time for institutions to respond and more time for development/preparation between cycles.	Changing to a 2 cycle year rather than 3.
Procedural	CAR/FAR Late Fees	Increase late fees incrementally and defer to 2-3-401 after 10 days to deter late submissions or lack-there-of.	\$500 late fee following November 1 and increases \$100 each day. Notice to be sent November 2 nd to those not submitted with a warning of revocation if not received within 10 days.



MEMORANDUM TO THE FIELD MAY 2017

TO: ACICS-Accredited Institutions and Interested Parties

FROM Accrediting Council for Independent Colleges and Schools

DATE: May 10, 2017

The Memorandum to the Field contains proposed criteria along with other information for ACICS-Accredited Institutions and Interested Parties

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1. Proposed Criteria Revisions

At its April 2017 meeting, the Council reviewed specific areas of the *ACICS Accreditation Criteria* outlined in this section as a result of its continuous process of systematic review, and approved the revisions as proposed for feedback from the field (new language is underlined, deleted language is struck). Proposed changes are reconsidered for final approval and implementation at the Council’s next meeting and incorporate the perspectives shared by the field. Public comment on these revisions is requested through the ACICS Comment Survey explained at the end of the memorandum. ACICS requests comments and recommendations from a broad cross section of ACICS stakeholders, including students, faculty, school administrators, policy advocates, and others.

A. Intent to Bar/Debarment Appeal

Explanation of Proposed Changes

The Council proposes to clarify the language surrounding the debarment appeal process. The revised language clarifies the procedure that individuals or entities may only appeal the intent to bar. The current language on debarment could be interpreted that an individual or entity may also elect to appeal the debarment action, after an appeal of the intent. The revised language intends to remove this possible interpretation.

2-3-900 – DEBARMENT

... The intent to bar notice will inform the person(s) or entity that they are entitled to present information and materials in writing or in person to appeal the intent to bar at the next scheduled meeting of the Council. The notice will stipulate that if they intend to appeal the intent to bar, the person(s) or entity must inform the Council office in writing within ten days of receipt of the notice as to whether they will appeal the intent to bar in writing or in person. The Council's decision is final if the person or entity elects not to appeal within ten days of the Council notification.

A debarment order may be issued by the Council as a result of its consideration of the facts presented in the appeal. The Council's decision is final and will be sent to the person(s) or entity by electronic and certified mail following their appeal before the Council.

~~The Council's decision is final if the person or entity elects not to appeal within ten days of Council notification. The Council's decision is also final following appeal.~~

B. Review Board Members and Expenses of an Appeal

Explanation of Proposed Changes

The Council proposes to clarify language regarding the Review Board of Appeals. The proposed language indicates that a panel of three persons will be selected from a pool of 15 members of the Review Board of Appeals. The order of the types of members has also been reorganized for consistency. In addition, the proposed language clarifies the remittance of a standard hearing fee.

2-3-600 – REVIEW BOARD APPEAL PROCESS

2-3-602. Appointment of Members. The Review Board of Appeals shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation, who are appointed to three-year terms. An appointed person shall not have been a commissioner within one year prior to appointment. The Review Board of Appeals shall consist of at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Appendix A.

A Review Board of Appeals panel of three to seven persons, depending on the scope and complexity of the matter or institution being reviewed, will be designated by the Council from the entire Review Board to hear an appeal from an institution. The Council will also designate one member of the Review Board Panel to serve as chair. The selection and actions of the panel are subject to ACICS conflict of interest policies. A Review Board Panel will consist of at least ~~one (1) public, one (1) administrative, and one (1) academic,~~ one (1) administrative, and one (1) public representative as defined in Appendix A.

2-3-608. Expenses of Appeal Hearing. The institution shall bear the following expenses in connection with the appeal:

- (a) travel and subsistence of the Review Board panel members participating in the hearing; and
- (b) cost of the hearing room and transcription.

An appeals ~~fee~~ deposit must be ~~remitted to~~ made with the Council at the time of the filing of the notice of appeal described in Section 2-3-604. This ~~fee~~ deposit shall be applied to the expenses listed above, and any excess deposit will be returned to the institution.

APPENDIX A BYLAWS ARTICLE VII Appeals Process

Section 1 – Review Board of Appeals. A Review Board of Appeals shall be appointed by the Council. The purpose of the Review Board shall be to review, according to pre-established procedures and guidelines, appeals by members of final negative actions by the Council and in each case either to affirm the action of the Council, to remand the case to the Council for further review, or to amend or overturn the action. The Review Board shall consist of a pool of fifteen (15) persons, all of whom have had experience in accreditation. The Review Board shall include at least two (2) academic representatives, two (2) administrative representatives, and three (3) public members, as defined in Article III, Section 1 herein. Review Board panels will consist of a minimum of three (3) members and be comprised of at least ~~one (1) public,~~ one (1) academic, ~~and one (1) administrative,~~ and one (1) public representative. Members shall be appointed to terms of three years, with terms of initial appointees staggered so that one-third of the terms expire each year. A person appointed to the Review Board shall not have been a commissioner within one year prior to appointment. The President shall convene timely a panel of the Review Board when necessary.

C. Institutional Grant Length

Explanation of Proposed Changes

The Council proposes to reinstitute the determination of grant length at the institutional, rather than at the campus level. That is, the institution (main and its branches) will be awarded a grant of accreditation given that a branch does not hold an accredited status; rather, it is approved within the accredited status of the main campus. While the Council

currently has the discretion on the length of an award across campuses, the proposed change would eliminate the ability to award a grant length to a branch campus independently of its main.

2-1-701. Maximum Length of Grants of Accreditation. The Council determines the grant lengths of each ~~campus~~-institution that is accredited by ACICS. The maximum length of an initial grant of accreditation is three years. If an institution can demonstrate a record of having been in good standing with another institutional accrediting agency recognized by the United States Department of Education, the Council may award an initial grant of up to four years. The maximum length of a renewal grant of accreditation is six years.

~~**2-1-702. Grant Lengths of Branch Campuses in Multiple-Campus Institutions.** The Council at its discretion may determine that the grant length and/or expiration date for a branch campus will not coincide with the grant length and/or expiration date for the main campus. In the event that the main campus fails to maintain its accreditation status with ACICS, the associated branches and learning sites are ineligible for accreditation by ACICS.~~

D. Unannounced Visit Fees

Explanation of Proposed Changes

The Council proposes that the Criteria related to charges for unannounced visits be consistent with fees assessed for scheduled visits. Therefore, the proposed change is that unannounced visits will be assessed a flat visit fee, rather than based upon expenses. Failure to pay the fee would be subject to adverse action.

~~**2-1-405. Expenses Fees.** Visit expenses for all team members, including the ACICS staff member who accompanies the team, shall be paid by the institution. Expenses include an honorarium for members of the team. A fee will be assessed for this visit. Failure to remit payment for the visit fee may result in an adverse action.~~

Appendix B (in Criteria)

~~Expenses Fees~~

~~A fee will not be assessed for this visit, but each institution will be billed for expenses incurred during the visit. Failure to remit payment for expenses this fee may result in a directive to show cause why the accreditation of the institution should not be withdrawn. an adverse action.~~

E. Council Hearing Procedures

Explanation of Proposed Changes

At its December 2016 meeting, the Council moved to require all show-cause hearings to be in writing unless an in-person hearing is directed by the Council. For clarity, the notation "in-writing hearing" is being revised to an "institutional review" and hearings reserved for in-person appearances before the Council. For institutional reviews, the submission of documentation and fee would replace a notification of the institution's acceptance as

confirmation of the understanding of its show-cause status. The proposed changes also include revisions to the procedures for when the Council requires a hearing in person.

2-3-230. Show-cause Directive.

...The issuance of a show-cause directive may be considered the basis for an institutional review or hearing in person, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of ~~this hearing~~ the Council's review of the institution's response or the hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

2-3-500 – COUNCIL HEARING-REVIEW OR HEARING PROCEDURES

All institutional reviews~~hearings~~ will be in writing unless the Council exercises its sole discretion to require ~~allow~~ a hearing in person before the Council. The following procedures will govern reviews to be conducted by and hearings to be held before the Council:

~~(a) The acceptance of a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the show-cause directive. The acceptance of a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the acceptance of a hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing.~~

~~(b)~~ (a) The institution shall have the right to respond with evidence and facts concerning the areas of noncompliance with which it has been charged, to raise all reasonable questions, and to present evidence in opposition to or extenuation of the charges of noncompliance. Such written evidence must be submitted by the date prescribed by the Council unless the institution can show that such information was not available before the submission date and that failure to make a timely submission was outside of the institution's control.

~~(e)~~ (b) In the event that the Council requires a hearing in person, the institution's acceptance of an in-person hearing must be made within ten (10) days from the date of receipt of the letter of notification of show-cause directive. The acceptance of the in-person hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the acceptance of the hearing, the Council will notify the institution of the procedures to follow to prepare for the hearing. ~~In the event that the Council allows a hearing in person, the institution may present only evidence not already considered.~~ The institution may send one or more representatives, including legal or financial counsel, to present its argument in opposition to or extenuation of the Council action. The Council transcribes all such hearings for its records. A copy of the transcript is available to the institution upon request.

2-3-501. Institutional Review or Hearing Format. Institutional reviews conducted by and hearings before the Council resulting from a show-cause directive and involving areas of

noncompliance other than or in addition to financial concerns will take place before a panel of commissioners.

A review or hearing panel of at least three commissioners will be designated by the Council to review the written response and hear the presentation of the institution, if applicable. The panel will present its findings and its recommended action to the full Council, which will make the final decision within the time frames specified in Title II, Chapter 3.

2-3-502. Financial Reviews or Hearings. All reviews conducted by or hearings before the Council for financial concerns only will be deliberated or heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision within the time frames specified in Title II, Chapter 3.

F. Revision of Title - Change of Ownership/Control Action

Explanation of Proposed Changes

The Council proposes a revision to the following title of the criterion to better reflect its content. The title clarifies the denial of reinstatement of accreditation after change of ownership or control, rather than a denial of the change of ownership/control itself.

2-3-302. Denial of Renewal of Accreditation or Denial of Reinstatement of Accreditation Following Change of Ownership/Control. An institution that objects to a Council decision to deny an application for a renewal of accreditation or reinstatement of accreditation following a change of ownership or control has the right to appeal the decision to the Review Board of Appeals pursuant to the procedures described in 2-3-604.

G. Institutional Show-Cause and Withdrawal of Approval

Explanation of Proposed Changes

The Council proposes to clarify language regarding a show-cause directive on a branch campus. The revised language indicates that a show-cause action may result in the withdrawal of approval of a branch campus or the withdrawal of accreditation of the institution.

2-3-230. Show-Cause Directive. Show-cause is a status that the Council may impose on an institution-when it determines that the institution or one of the campuses within the institution does not materially operate in accordance with the *Accreditation Criteria*. The Council will provide ~~the institution with~~ a written summary of the areas of noncompliance to the institution, and the institution which will be required to provide evidence of corrective action for review by ACICS. Following receipt of a show-cause directive, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or ~~the institution~~ will be subject to an adverse action.

The issuance of a show-cause directive may be considered the basis for a hearing, at the discretion of the Council, as defined in Section 2-3-500. A suspension order or denial action may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board of Appeals as described in Section 2-3-600. All institutions that are issued a show-cause directive by the Council will be directed to submit a school closure plan and may be required to submit a teach-out agreement as described in Section 2-2-303 of the *Accreditation Criteria*.

2-3-231. Result of Show-Cause. The Council will not accept any applications for new programs or new campuses from any institution on show-cause unless ~~the institution receives approval~~ is received in advance to submit such an application.

2-3-400 – ACCREDITATION WITHDRAWN

“Withdrawal of accreditation” differs from “denial of accreditation” in that denial rejects an institution’s application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; withdrawal of accreditation takes away a current grant of accreditation before its expiration. Accreditation may be withdrawn from an institution or inclusion withdrawn from a branch campus through two types of Council action: “revocation of accreditation” or “suspension of accreditation.”

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (a) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (b) An institution fails to submit a written response to a show-cause directive by the indicated due date.
- (c) ~~(b)~~ An institution or campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (d) ~~(e)~~ The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801 to 2-1-802.)
- (e) ~~(d)~~ The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

2-3-402. Suspension. Suspension of accreditation may occur when, in the judgment of ACICS, an institution or one of the campuses within the institution no longer complies with the criteria.

By way of illustration, ACICS might issue an order of suspension for reasons such as the following:

- (a) The institution or any of its components (a branch or new program, for example), is evaluated as directed by ACICS and is determined not to be in compliance with the criteria.

- (b) Periodic required reports filed by the institution/campus fail to conform to Council reporting requirements.
- (c) The institution/campus makes substantial or significant change, without notice to ACICS, in its operation, structure, governance, ownership, control, location, facilities, or programs of study.
- (d) The institution/campus fails to respond to or cooperate with attempts by the Council to make arrangements for a site evaluation.
- (e) The institution/campus has deviated from the criteria or other directives of ACICS.
- (f) The institution fails to disclose any agreements, options, or other contractual arrangements between the institution and other parties which bear on the management or control of the main campus or its nonmain campuses.

In all cases of suspension, the Council retains discretion to specify whether and under what conditions the institution might apply for an initial grant of accreditation or inclusion of a branch campus.

2-3-403. Procedural Guarantees for Withdrawal by Suspension. In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- (a) Opportunity for a review or hearing before ACICS on all material issues in controversy.
- (b) Written prior notice of the proceedings, the charges levied, and the standards by which the institution/campus ultimately is to be judged.
- (c) A decision on the record alone and a statement of reasons for the ultimate decision.
- (d) A right of appeal as provided in Section 2-3-600.
- (e) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

H. Revocation for Failure to Respond to Show-Cause Directive

Explanation of Proposed Changes

The Council proposes to add an additional reason for the revocation action - when an institution does not respond to a show-cause directive. The language also allows for withdrawal actions to also be taken at the campus level.

2-3-400 – ACCREDITATION WITHDRAWN

“Withdrawal of accreditation” differs from “denial of accreditation” in that denial rejects an institution’s application for an initial grant of accreditation or for a renewal of accreditation to take effect upon the expiration of an existing grant of accreditation; withdrawal of accreditation takes away a current grant of accreditation before its expiration. Accreditation may be withdrawn from an institution or inclusion withdrawn from a branch campus through two types of Council action: “revocation of accreditation” or “suspension of accreditation.”

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:

- (f) An institution or campus notifies the Council that it has closed and/or ceased operation.
- (g) An institution fails to submit a written response to a show-cause directive by the indicated due date.
- (h) ~~(b)~~ An institution or campus whose accreditation has been summarily suspended does not challenge the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
- (i) ~~(e)~~ The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801 to 2-1-802.)
- (j) ~~(d)~~ The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo the entire accreditation process to regain accreditation.

I. Student Achievement Procedures

Explanation of Proposed Changes

The Council proposes changes in the Criteria to reflect recent changes in standards and guidelines regarding student achievement. The proposed language will be consistent with other Council actions and provide clarity on its expectations with each action. In addition, two sections of the Criteria related to Student Achievement have been revised to remove redundant language. A revision was also made to procedural guarantees for withdrawals by suspension to include language for what is now an institutional review.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention, placement, and licensure examination pass rates, as applicable. When this review indicates that the achievement of an institution's students is below benchmark, the Council will take action consistent with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports. ~~place the campus or program on reporting and require the institution to add an Improvement Plan within its Campus Effectiveness Plan (CEP). If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a compliance warning or a show-cause directive, or otherwise take action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. If the Council deems an institution significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance, then it will take an adverse action. Those with campus- or program-level plans are subject to additional reporting requirements, and additional restrictions may be imposed upon those that are out of compliance.~~

2-2-502. Program Show-Cause or Compliance Warning. When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure examination pass rates, the institution will be provided in writing with a show-cause directive or compliance warning regarding the alleged deficiency in accordance with the guidelines outlined in Appendix L, Student Achievement

~~Standards and Campus Accountability Reports. The show-cause or compliance warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established time frame or be taught out and discontinued or otherwise conditioned.~~

~~A program show-cause or compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program show-cause or compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, and Appendix L, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503.~~

~~A program that is placed on show-cause status is required to notify its current and prospective students along with the public immediately and in writing of its show-cause status through appropriate means.~~

Appendix L Student Achievement Standards and Campus Accountability Reports

INTRODUCTION

ACICS defines academic quality in terms of the extent to which an accredited institution achieves its intended student learning and student success outcomes. Student learning outcomes involve assessment of skill and competency attainment, including licensure examination pass rates, where applicable. Student success outcomes include student retention or persistence and employment or placement.

Section 2-1-809 of the *Accreditation Criteria* requires periodic Council review of student achievement data, verified both by the institution as well as by the Council, submitted by the campus in the annual Campus Accountability Report (CAR) as required under Section 2-1-801. Appendix L provides an overview of the Council's student achievement standards and Council actions that will be taken if the student achievement data show that a campus or program is out of compliance with these standards.

STUDENT ACHIEVEMENT EXPECTATIONS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure examinations where applicable, and find appropriate employment.

Campus-Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard	Benchmark*
Retention Rate	60%	70%
Placement Rate	60%	70%

Program-Level Student Achievement Elements (Effective 2013 Reporting Year)	Standard	Benchmark*
Retention Rate		
• Program length equal to or less than one (1) year	60%	70%
• Program length more than one (1) year	60%	65%
Placement Rate	60%	70%
Licensure Examination Pass Rates, where applicable**	60%	70%

*A campus and/or program whose rates fall below Benchmark must develop and implement an improvement plan.

** Licensure examination pass rates standards apply where a licensure is required for employment to programs for which licensure or certification is required to practice in the specific career field. The program is also required to meet applicable licensure agency standards if higher rates are required any higher licensure agency standards.

DATA COLLECTION AND VERIFICATION OF DATA INTEGRITY

As required under Standard 2-1-801, each main campus and each branch campus must submit an annual Campus Accountability Report (CAR). These reports are due on or before November 1 annually. The CAR reporting year is July 1 to June 30. Placement is accepted through November 1 of the CAR reporting year. Based on the student-by-student data submitted by the campus, the Council calculates the various student achievement rates. All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness (see Standard 3-1-203). In addition to the Council review of data on an annual basis, placement information is reviewed via monthly submissions, and all CAR data is subject to review and verification at any time, including during an on-site evaluation visit.

STUDENT ACHIEVEMENT REVIEW AND COUNCIL ACTIONS

The Council reviews student achievement data for each campus on an annual basis and takes appropriate action. The Council reserves the right to take immediate adverse action once a campus and/or program is found out of compliance and will exercise its judgment in applying the guidelines outlined below: ~~The Council will follow the guidelines listed below:~~

Year Reporting	Rates	Campus and/or Program^ Status**	Council Directed Activities
Current Submission	60-69.9%	Reporting	<ul style="list-style-type: none"> Development and Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus and/or program level) Attendance at ACICS's Retention and Placement Workshop (campus level)

Year Reporting	Rates	Campus and/or Program [^] Status**	Council Directed Activities
	50-59.9%	Compliance Warning	<ul style="list-style-type: none"> • <u>Institutional review before the Council (campus level)</u> • <u>Development and Implementation of an Improvement Plan (IP) and inclusion into the Campus Effectiveness Plan (CEP) (campus and/or program level)</u> • <u>Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (campus and/or program level)</u> • <u>Submission of all communication and reporting with the oversight agency on licensure performance (program-level licensure)</u> • <u>Submission of updated licensure information as provided by the oversight agency, or a reliable third-party, or as collected and compiled by the campus with supporting backup documentation (program-level licensure)</u>
Current Submission	Below 49.9%	Show-Cause	<ul style="list-style-type: none"> • <u>Institutional review before the Council</u> • <u>Submission of Submit evidence of a corrective action plan to the Council along with documentation of implementation and effectiveness (campus and/or program level)</u> • <u>Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period Mid-year rate and backup documentation of the activities occurring between July 1 and December 31 (campus and/or program level)</u> • <u>Notification of its status to its current and prospective students on its website, internal student communication system, and appropriate admissions forms and reference materials (campus and/or program level)</u> • <u>Submission of a prepared campus closure plan and/or program termination plan that includes an audit of students currently enrolled along with a plan for teach out (campus and/or program level)</u> • <u>Submission of all communication and reporting with the oversight agency on licensure performance (program-level licensure)</u> • <u>Submission of updated licensure information as</u>

Year Reporting	Rates	Campus and/or Program [^] Status**	Council Directed Activities
Current Submission			<p><u>provided by the oversight agency, or a reliable third- party, or as collected and compiled by the campus with supporting back up documentation (program-level licensure)</u></p>
	*	Adverse Action	<ul style="list-style-type: none"> • <u>Implement an ACICS approved Submission of a Campus Closure Application with a teach-out plan and agreements, if applicable (campus-and program level)</u> • <u>Institutional review before the Council Appealable to the Review Board of Appeals (campus and/or program level)</u> • <u>Submission of Submit a Program Termination Application Plan with teach-out or transfer-out agreements for ACICS approval (program level)</u> • <u>Immediate cessation of new enrollment (program level)</u>
Following Year 1	50-59.9%	Show-Cause	<ul style="list-style-type: none"> • <u>Institutional review before the Council</u> • <u>Submission of Submit evidence of a corrective action plan to the Council along with documentation of implementation and effectiveness (campus and/or program level)</u> • <u>Submission of a partial Campus Accountability Report (CAR) which includes backup documentation to support the rate(s) reported for the specified period (campus and/or program level)</u> • <u>Notification of its status to its current and prospective students on its website, internal student communication system, and appropriate admissions forms and reference materials (campus and/or program level)</u> • <u>Submission of a prepared campus closure plan and/or program termination plan that includes an audit of students currently enrolled along with a plan for teach out (campus and/or program level)</u> • <u>Submission of all communication and reporting with the oversight agency on licensure performance (program-level licensure)</u> • <u>Submission of updated licensure information as provided by the oversight agency, or a reliable third- party, or as collected and compiled by the campus with supporting back up documentation (program-level licensure)</u> • <u>Attendance at ACICS's Retention and Placement Workshop (campus level)</u>

Year Reporting	Rates	Campus and/or Program [^] Status**	Council Directed Activities
Following Year 1	Below 459.9%	Adverse Action	<ul style="list-style-type: none"> • Implement an ACICS approved Submission of a Campus Closure Application with a teach-out plan and agreements, if applicable (campus and program level) • Institutional review before the Council <u>Appealable to the Review Board of Appeals (campus and/or program level)</u> • Submission of Submit of a Program Termination Plan Application with teach-out or transfer-out agreements for ACICS approval (program level) • <u>Immediate cessation of new enrollment (program level)</u>
Following Year 2	Below 59.9%	Adverse Action	<ul style="list-style-type: none"> • Implement an ACICS approved Submission of a Campus Closure Application with a teach-out plan and agreements, if applicable (campus and program level) • Institutional review before the Council <u>Appealable to the Review Board of Appeals (campus and/or program level)</u> • Submission of Submit a Program Termination Plan Application with teach-out or transfer-out agreements for ACICS approval (program level) • <u>Immediate cessation of new enrollment (program level)</u>

** If the Council deems an institution or an individual program significantly out of compliance relative to student achievement outcomes with little or no chance of coming into compliance within the maximum time frame, it will take an adverse action. ~~If in the event that the Council finds an institution or an individual program to be out of compliance at a level that, in its judgement, determines that the institution or program can come into compliance can be remedied within a period of time not to exceed the maximum time frames specified in Title II, Chapter 3, Introduction, in a reasonable period of time,~~ it will take action appropriate to the circumstances such as compliance warning or show-cause directive.*

***For any campus institution or program that receives a compliance warning or show-cause directive, the institution must ~~bring itself~~ come into compliance within a period of time not to exceed the maximum time frames specified in Title II, Chapter 3, Introduction (i.e. an institution whose longest program is less than one year in length has a time frame of twelve months to come into compliance).*

[^] A program show-cause directive or compliance warning is not an adverse action and is therefore not appealable. It is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. ~~Following receipt of a program show-cause or compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, and Appendix L, or the institution will be subject to adverse action in the form of~~

~~withdrawal of approval for inclusion of the program within the institution's grant of accreditation as described in Section 2-2-503.~~

Description of Student Achievement Review Actions

Immediate Adverse Action: The Council reserves the right to take immediate adverse action if the institution or one of its campuses is significantly out of compliance with the Council standards with little or no chance of coming into compliance within the maximum time frame. An adverse action for an institution campus is a withdrawal by suspension of the institution's accreditation, or withdrawal of inclusion of the branch campus's approval within the accredited status of the institution. An adverse action ~~and~~ for a program is the withdrawal of that program's approval termination of the program, except for teach-out purposes for the currently enrolled students. An institution, in accordance with Section 2-3-403(a), will be allowed the opportunity for a review before the Council hearing prior to the issuance execution of a ~~withdrawal by suspension~~ an adverse action.

Withdrawal by Suspension or Termination of a Program If an institution or one of its campuses does not come into compliance within the time frames specified ~~for by~~ compliance warning or show-cause directive, the Council, then the Council will issue then they will issue a withdrawal by suspension ~~action of the institution's accreditation, or~~ withdrawal of inclusion of the branch campus's approval within the accredited status of the institution. In cases where an immediate adverse action is warranted on a campus, an intent to show-cause will be issued to allow for a review before the Council. ~~The Council will~~ require the campus to submit an ACICS-approved teach-out plan and teach-out agreement, if applicable. If a program does not come into compliance within the time frames specified for compliance warning or show-cause, it will be required to cease enrollment and terminate the program of study.

Withdrawal of Program Approval: If a program does not come into compliance within the time frames specified by the Council, then a withdrawal of program approval will be issued and the institution will be required to immediately cease new enrollments and terminate the program. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only and is not appealable to the review board.

Show-Cause: The Council will issue a show-cause directive against any campus or program that is materially below the Council standard, as defined as below 50% for any student achievement indicator in its current submission. The show-cause directive is an action by which the Council determines that the campus and/or program is materially out of compliance and provides the institution an opportunity for a review before the Council concerning the deficiencies identified. The campus must submit evidence to the Council of the corrective actions planned and implemented to improve performance and come into compliance. Further, the campus must prepare a campus closure and/or program termination plan. In addition, the campus and/or program must provide notification of its status to all current and prospective students. If the show-cause directive is as a result of licensure examination pass rate performance, the campus must also provide updated pass rate information and all communication from the oversight agency concerning the monitoring of its performance. ~~As a result of being found out of compliance, the campus~~

~~and/or program will have one year to bring themselves into compliance with the applicable standard.~~

Compliance Warning: ~~Following the CAR submission if a campus and/or program reports student achievement retention or placement rates or program-level licensure examination pass rates between 50-60%, the Council will issue a compliance warning, and the campus and/or program will be found out of compliance.~~ A campus and/or program on compliance warning is required to evaluate, analyze, and if necessary, revise the Improvement Plan implemented while on student achievement reporting. The Council reserves the right to request the submission of the evaluation and analysis of the Improvement Plan for Council review. The campus will be given the opportunity for a review before the Council to provide evidence of improvement at the campus level. As a result of being found out of compliance, the campus and/or program must come into compliance within a period of time not to exceed the maximum time frames specified in Title II, Chapter 3, Introduction.

Reporting: ~~Following the CAR submission if~~ If a campus and/or program reports student achievement retention or placement rates or program-level licensure examination pass rates between 60-70%, it is considered on student achievement review and reporting. The campus and/or program is required to show improvement and must develop and implement an Improvement Plan that is fully incorporated into the Campus Effectiveness Plan (CEP). The Improvement Plan must identify the factors negatively impacting the student achievement outcome, the specific activities to be implemented or being implemented to address the deficiency, and an analysis of any changes realized since its implementation. ~~include the required elements and~~ This plan will ~~may~~ be reviewed during any on-site evaluation visit. ~~In addition, those campuses must attend an ACICS Retention and/or Placement Workshop.~~

Data Collection and Verification: ACICS standards are applied by the Council to data collected from each main and branch campus through the annual Campus Accountability Report (CAR). The Council reviews campus- and program-level retention and placement rates and program-level licensure examination pass rates where licensure is required for employment in the state where the campus is located. The CAR reporting year is July 1 to June 30, and placement is accepted through November 1 of the CAR reporting year.

Please refer to Campus Accountability Report (CAR) Guidelines and Instructions for details regarding online submission of the annual report, instructions, types of information collected, and calculation formulas.

2-3-403. Procedural Guarantees for Withdrawal by Suspension. In all cases where accreditation is subject to withdrawal by suspension under Section 2-3-402, the institution is afforded the following procedural guarantees:

- (a) Opportunity for a review or hearing before ACICS on all material issues in controversy.
- (b) Written prior notice of the proceedings, the charges levied, and the standards by which the institution/campus ultimately is to be judged
- (c) A decision on the record alone and a statement of reasons for the ultimate decision.

- (d) A right of appeal as provided in Section 2-3-600.
- (e) If the Review Board of Appeals affirms the withdrawal of accreditation by way of suspension, the appeal shall be deemed to be finally disposed of upon issuance of the decision and publication will be made as described in Section 2-3-607.

J. Initiation of Distance Education

Explanation of Proposed Changes

The Council seeks to clarify the language regarding the approval needed to initiate distance education or other new instructional delivery methods. The new language would allow for an institution to directly offer a new online course or program once they have submitted and received approval of a distance education application without having to first have approval of the program residentially.

2-2-106. Initiation of Distance Education (Online) or New Instructional Delivery Method. Any institution that intends to initiate courses or programs delivered through an instructional method not currently included in the institution's scope of accreditation must secure approval from the Council. It is the responsibility of the institution to secure such approval from the Council of the intention to initiate online delivery. Any significant change in instructional delivery method requires prior Council approval.

An institution seeking to initiate a distance education course or program, including hybrid/blended instruction or other new instructional delivery methods, must submit a distance education application and the required documentation for Council review and approval before distance education is included in the institution's current scope of accreditation. The approval of distance education for an institution includes all of its campuses; however, any campus seeking to initiate a new distance education course or program must complete a new program application and the required documentation.

~~The institution or campus must initiate the approval process through the submission of a new program application and required documentation information for Council review and approval before being included into the institution's current scope of accreditation.~~

K. Denial Actions Not Affecting Overall Accreditation

Explanation of Proposed Changes

The Council proposes a revision to the language that clarifies the institution's right to object to other denial actions of requested substantive changes.

2-3-303. ~~Other Denial Actions Not Affecting Overall Accreditation.~~ An institution that objects to a Council decision to deny an application for the addition of a program within the institution's current scope of accreditation ~~for branch-to-freestanding status or new program inclusion will be given the opportunity to present its case to a panel of the Council and to be heard at a subsequent regularly scheduled meeting of the Council. The~~

institution may offer new evidence that will be considered by the Council if timely submitted, or any substantive change addressed in Standard 2-2-101, will be given the opportunity to present its case to the Council.

L. Substantive and Non-Substantive Changes

Explanation of Proposed Changes

The Council proposes to recognize that a 25 percent decrease to a program's clock or credit hours is also a substantive change. The revised wording would include a 25 percent or greater change (to include increase and decrease). In addition, the Council proposes that campuses must notify ACICS of non-substantive changes prior to implementation and notify ACICS when a change has not been implemented within a year.

2-2-101. List of Substantive Changes. The following institutional changes will be considered substantive and require Council approval before they can be included in the institution's scope of accreditation:

...(g) a ~~25% percent~~ percent or greater ~~change increase~~ in the number of clock or credit hours awarded for successful completion of a program as described in Standard 2-2-109;...

It is required that the change will occur within one year of approval. If the institution does not implement the change in this time frame, it shall notify the Council, and reapply for the change if it still seeks implementation. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

2-2-109. Increasing or Decreasing the Number of Clock or Credit Hours. It is the responsibility of the institution to secure approval from the Council of the intention to initiate an ~~change increase~~ of 25 percent or greater in the number of clock or credit hours awarded for successful completion of a program. If the percentage is less than 25 percent but results in a change in the credential level, the credential level ~~will~~ must be evaluated to be included within the institution's scope of accreditation.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation. The institution shall notify the Council if it does not implement the changes within one year of approval. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

2-2-121. Changes to Existing Programs. Changes to existing or currently approved programs fall under (a) extensive changes and (b) non-substantive changes.

(a) *Extensive Changes.* An extensive change to an existing program application process must be initiated and approval received prior to implementation. Failure to do so will result in a compliance warning for offering an unapproved program. The following

- changes will be considered substantive changes to the institution's scope of accreditation and require approval per Section 2-2-100 – Substantive Changes:
- i. a ~~25% percent change increase~~ in the number of clock or credit hours awarded for successful completion of an existing program; and
 - ii. a change from clock hours to credit hours.
- (b) *Non-substantive Changes*. These include minor changes to existing programs which do not substantially alter the scope, objectives and nature of the programs as described in ~~Standard~~ Section 2-2-151.

If the percentage is less than 25 percent but results in a change in the credential level, the credential level must be evaluated to be included within the institution's scope of accreditation.

2-2-151. Non-Substantive Program Changes. Institutions and campuses are required to notify the Council of all non-substantive changes to existing programs. ~~Changes in the program name, clock/contact hours, credits awarded, or program length will be disclosed to the public via the ACICS website prior to implementation.~~ The following non-substantive changes will be acknowledged:

- (a) less than 25% percent change in existing contact hours; credits awarded, curriculum content (courses offered), or program length of a currently approved program within a 12-month period;
- (b) a change in the name of an existing program that does not change the overall objective of the program; and
- (c) a change from semester to quarter credit hours or vice versa.

If the institution applies for acknowledgment of non-substantive program changes prior to implementation but chooses not to implement the changes within one year of approval, it must notify the Council. Requests to extend the proposed start date beyond one year of the initial date must be submitted to the Council.

M. Renewal of Accreditation Application Submission

Explanation of Proposed Changes

The Council proposes to allow campuses to submit all renewal applications and fees three months before the start of the campus's assigned review cycle rather than September 30th prior to the renewal year. Information submitted closer to the visit would give ACICS a more accurate picture of the campus. In addition, Council proposes that once self-study materials are submitted, substantive changes would not be allowed before the visit.

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 three months prior to the start of the assigned review cycle. ~~by September 30th of the year prior to the last year of the grant of accreditation.~~ This also involves submission of the institution's renewal self-study, with supporting documents. Institutions that have not submitted a renewal self-study at least two months prior to the start of the assigned review cycle ~~by December 1st of the year preceding expiration of the~~

~~grant,~~ and have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, will be subject to late fees and may be issued a show-cause directive-compliance warning. The accreditation previously granted to an institution expires automatically with the passage of time unless extended by an action taken by ACICS. An extension of the previous grant cannot exceed one year, and not more than one extension may be given except for extraordinary circumstances over which the institution has no control.

2-1-301. Application. The process of application for a renewal of accreditation is the same as for initial accreditation except that institutions are not required to undergo another resource visit. One the self-study has been submitted, no substantive changes to the institution shall be allowed until after the campus site visit takes place. Multiple campus institutions that are applying for renewals of accreditation will be required to submit a separate self-study for each branch campus.

N. Advertising – Third Party Services

Explanation of Proposed Changes

The Council proposes to eliminate one element of Appendix C referencing disclosure of third party services for advertising, due to being irrelevant.

Appendix C

ADVERTISING Any advertisement or promotional literature written or provided by an institution through any type of media shall be completely truthful and dignified. The material shall be presented in a manner which avoids leaving any false, misleading, or exaggerated impressions with respect to the institution, its personnel, its courses and services, or the occupational opportunities for its graduates. An English translation for advertising that is in a language other than English must also be available.

...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 students. ~~A disclosure must be made for services which are funded by third parties that are offered at no cost to students.~~

O. Criterion Description – Integrity

Explanation of Proposed Changes

The Council proposes to revise the language for the criterion regarding integrity of an institution to include capability of management since the subsections include the assessment of both the integrity and capability of the institution’s administration.

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.

P. “Centrally Controlled Institutions” and “Distributed Enterprise”

Explanation of Proposed Changes

The Council proposes to remove all references to “Centrally Controlled Institutions” and “Distributed Enterprises” given that ACICS is no longer pursuing the recognition of this type of entity. The deletion of all references of these terms will provide clarity and consistency related to classifications of institutions.

1-3-200. Classification of Institutions. The Council classifies institutions into ~~three~~ two categories: single campus; and multiple campus; ~~and distributed enterprise.~~ Classification depends upon the number of locations included within the institution and the nature of administrative control over educational activities at the institution.

1-3-203. Centrally Controlled Institution. A centrally controlled institution is an institution that provides educational programs at multiple locations operating within the context of an administrative system. ~~*Implementation of this section of the Criteria and all references to Centrally Controlled Institution is not yet effective. The effective date will be announced as soon as it has been determined by the Council.~~

- (a) ~~The centrally controlled institution must include one main campus with branch campuses and an academic administrative center. The institution must demonstrate its capacity to add and to successfully control educational activities at multiple locations.~~
- (b) ~~The academic administrative center is the primary location of a centralized academic administrative system by which educational activities at a centrally controlled institution are controlled. These educational activities include development and delivery of instructional programs, hiring and evaluation of faculty, establishment and maintenance of facilities, selection and purchasing of instructional equipment and library resources, provision of academic and student support systems, and maintenance of financial stability. The physical address of an academic administrative center may be identical to or separate from that of a main campus. Some administrative activities not directly related to design and delivery of educational programs may be controlled at other locations affiliated with the academic administrative center.~~
- (c) ~~To be classified as a centrally controlled institution, an institution must have
 - (i) ~~been accredited for at least ten consecutive years; and~~
 - (ii) ~~a main campus and at least three branch campuses that are currently accredited by ACICS and have been accredited by ACICS for at least the last four years.~~~~
- (d) ~~To be classified as a centrally controlled institution, an institution must provide satisfactory evidence of a well-established and highly centralized administrative system to ensure and enhance quality at all the campuses of the institution that includes the following:
 - (i) ~~clearly identified academic control;~~
 - (ii) ~~regular evaluation of the compliance of all the campuses with Council standards;~~
 - (iii) ~~adequate faculty, facilities, resources, and academic and student support systems;~~
 - (iv) ~~financial stability; and~~~~

~~(v) —long-range planning, including planning for expansion.~~

~~Compliance of a centrally controlled institution with the *Accreditation Criteria* is evaluated by the Council at the system level and also subsequently at the individual campus level. Accreditation is granted to the institution, with the specific inclusion of the main campus and all branch campuses.~~

Title II Chapter 1

2-1-100 – Accreditation Workshop Requirements

The Council schedules accreditation workshops each year. Applicants for initial or renewals of accreditation are required to attend a workshop. During these workshops, Council representatives will consult with institutional representatives to help them understand and complete the process. Institutional representatives are required to attend an accreditation workshop within 18 months prior to the final submission of the evaluation visit materials, which are due two weeks prior to an on-site visit. For initial applicants, the chief on-site administrators of main campuses and all branch campuses are required to attend. For currently accredited institutions, the chief on-site administrators or the renewal self-study coordinators for single campus institutions and multiple campus institutions, ~~and representatives of centrally controlled institutions~~ are required to attend. ~~Currently accredited centrally controlled institutions are responsible for providing workshop information to the chief on-site administrators and renewal self-study coordinators of all main campuses and branch campuses.~~

2-1-300 – Renewal of Accreditation

2-1-301. *Application.* The process of application for a renewal of accreditation is the same as for initial accreditation except that institutions are not required to undergo another resource visit. Multiple campus institutions that are applying for renewals of accreditation will be required to submit a separate self-study for each branch campus. ~~Institutions classified as centrally controlled institutions may submit a consolidated self-study with an appropriate supplement for each location.~~ The Council will not consider an application for a renewal of accreditation unless all reports are current and all fees are paid. (See Sections 2-1-801 and 2-1-802.)

2-1-400 – Visiting Teams, Selection and Composition

2-1-402. *Composition of Teams.* The size and qualifications of the team are determined at the discretion of the Council based on the type and size of the institution, the type and number of programs being offered, the mode of educational delivery, the location of the campus, student enrollment, credentials offered, and other special circumstances ~~such as visits to centrally controlled academic administrative centers.~~ Full-team on-site evaluation visits will consist of individuals serving as academic, administrative, public, or member representatives as defined in Appendix A, Bylaws.

2-1-500 – Team Functions and Procedures

2-1-503. *Procedures.* Institutions are provided in advance with a checklist of materials and documents that should be current and readily available for review by the team. Prior to the visit, institutions are required to update the self-study where significant changes have occurred since its submission to ACICS. ~~Teams visiting an academic administrative center~~

~~will generate a report that will be shared with teams conducting visits to the individual campuses within the centrally controlled structure.~~

2-1-600 – Post-Visit Procedures

2-1-601. *Opportunity to Respond.* The ACICS office sends a copy of each evaluation team report to the designated representative at the ~~centrally controlled academic administrative center-main campus~~ or to the chief on-site administrator of the respective multiple or single campus institution. These individuals are invited to respond in writing within the specified time frame.

2-1-800 – Maintaining Accreditation

2-1-801. *Annual Accountability Reports.* The Annual Accountability Reports must be submitted on Council forms, comply with Council guidelines, and be certified by the chief executive officer of the institution. Data must be submitted separately on the Campus Accountability Report (CAR) for each main campus and for each branch campus. ~~A centrally controlled institution must also submit a consolidated Institutional Accountability Report (IAR) containing information and data on the institution as a whole.~~ These reports are due on or before November 1st annually. Failure to submit the Annual Accountability Reports in a timely manner will result in the revocation of accreditation.

2-1-802. *Annual Financial Report.* The Annual Financial Report must be submitted on Council forms and be certified by an officer or stockholder of the corporation. Data must be submitted separately for each campus included in a grant of accreditation. ~~A centrally controlled institution must also submit a consolidated report containing data on the institution as a whole.~~ It is due no more than 180 days after the end of the institution's fiscal year. Failure to submit the Annual Financial Report in a timely manner will result in the revocation of accreditation.

2-2-200 – Redesignation of Campuses

2-2-203. *Designation of Centrally Controlled Institution.* ~~An institution may apply for classification as a centrally controlled institution by submitting an application and attachments on forms provided by the Council. Upon review of these materials, an evaluation visit will be conducted at one or more administrative sites and designated campuses to verify the information submitted and assess the eligibility of the institution for this classification. A full report will be submitted to the Council for review and approval.~~

3-1-202. *Institutional Integrity and Capability.* ...

- (a) Emphasis shall be placed upon the efficiency and effectiveness of the overall administration of the institution. Attention shall be given to educational activities, admissions, student financial aid, financial operations, plant and equipment, student services, and compliance with applicable local, state, and federal laws. The degree of institutional compliance with the criteria in these areas is a measure of the administrative capability of the chief on-site administrator of a main campus or branch campus ~~and, for a distributed enterprise, the designated chief administrator of the institution.~~

Glossary

~~**Institution, Distributed Enterprise.** An institution that provides educational programs at multiple locations operating within the context of a well-established and highly centralized administrative system. (See Section 1-3-203.)~~

2. For Information Only

A. Moratorium on Doctoral Programs

At the April 2017 meeting, the Council voted unanimously that, effective April 4, 2017, the moratorium approved by the Council on December 5, 2016, is now permanent and ACICS will no longer accept applications for doctoral programs. All current institutions with existing doctoral programs have until December 31, 2019, to: 1) teach-out their currently enrolled doctoral students in an orderly manner or 2) move from ACICS to another institutional accrediting agency. Further, these institutions will be required to prominently post and distribute notice to current and prospective students to advise them of this course of action, with a credible plan and path to completion for all enrollees going forward. If any of these conditions are not satisfied, the institution will be subject to an adverse action.

B. Automated Withdrawal of Aged Applications

In its continued attempt to ensure that campuses receive a timely review and processing of all applications, ACICS has conducted a comprehensive assessment of all its in-process applications and determined that a large number of applications are still pending, requiring additional information or response from the campus. The Council has concluded that the documents in such applications to be outdated and unusable for consideration.

Therefore, all institutions are advised that any applications submitted prior to May 1, 2016, that have had no activity from the institution within the past year, will be **marked for withdrawal**.

C. Placement Verification Program (PVP) Update

ACICS has recently updated the Placement Verification System to allow campuses to contest placements that ACICS has marked as INVALID. While previously this was done via e-mail, ACICS has now added the capability to contest and upload the supporting documents within the PVP. Please be advised that a placement may only be contested **once** and the decision of the review panel is **final**. The campus can expect to be notified within 30 days following their request. Instruction on contesting the placements can be found on the PVP web site.

D. The Quarterly Accountability Report

The need for more timely, informative, and usable data concerning student achievement outcomes at our accredited institutions continues to receive increased attention as ACICS

works diligently to enhance the focus on continuous improvement for both the institutions and the Council relative to these mission-critical outcomes. To that end, the CAR has undergone revisions to provide more informative and timely feedback at the program-level to enhance data collection processes and monitoring in regards to retention, placement, licensure and, eventually, graduation rates to the benefit of both your schools and your students. A pilot-test for the new CAR process was undertaken by the Institutional Council Members earlier this year. Further benefit of this more frequent self-monitoring and reporting has already been realized with mid-year 2017 CAR submissions required from more than 100 campuses under a student achievement actions that were in a number of cases mitigated with more recent data than that available in last year's CAR..

Beginning with the first quarter of the 2018 reporting period, all campuses will be required to submit a quarterly accountability report. The report will be due four months following the conclusion of the quarter. That is, July – September 2017 (due February 1, 2018); October – December 2017 (due May 1, 2018); January – March 2017 (due August 1, 2018); and April – June 2018 (due November 1, 2018).

E. Annual Meeting – June 21, 2017, from 1pm – 3pm EDST

An invitation will be sent to the membership within 30 days prior to the scheduled meeting.

F. Informational Webinar – Campus Accountability Reporting (CAR) (2017 and quarterly) & the Placement Verification Program (PVP)

ACICS will conduct an informational webinar on **May 25, 2017** concerning this new quarterly reporting process to ensure that all campuses are comfortable with the expectations and that an opportunity for feedback and dialogue is provided. The CAR's interaction with the PVP will also be discussed. An invitation to participate will be forthcoming.

3. Comment Survey – Proposed Criteria Revision

The Council encourages students, faculty, administrators, evaluators, employers, and other interested parties to provide feedback regarding proposed revisions to Council policies and procedures. Comments on the proposed Criteria revisions are due by **Friday, June 30, 2017**. ACICS is collecting all comments from the field on proposed Criteria revisions through an electronic survey. Please find the survey link below:

<https://www.surveymonkey.com/r/ACICS52017>

In preparation for the scheduled AWARE Webinar to discuss these proposed changed and informational procedures, please send your questions to <https://www.surveymonkey.com/r/WEBQA> to ensure that we are able to provide as much guidance as possible.

For any other questions, please contact:

Ms. Karly Zeigler
Manager of Institutional Compliance
kzeigler@acics.org

The AWARE Webinar Will Begin Momentarily

- Have questions? Submit them via the survey monkey link provided on the Memo-to-the-Field document.
- Have a copy of the Memo at-hand, an electronic version of which can be found on our web site, under the Council Action tab.





ACCREDITING COUNCIL FOR
INDEPENDENT COLLEGES AND SCHOOLS

AWARE Webinar

May 23, 2017
12:30-2:00pm EST

ACICS Webinar Announcing, **Relating & Explaining**
The May 2017 Memorandum to the Field



Today's Presenters

- **Perliter Walters-Gilliam**, Vice President – Accreditation
- **Karly Zeigler**, Manager, Institutional Compliance

WELCOME!



Agenda

- **Topic I: *Proposed Criteria Revisions & Changes***
- **Topic II: *For Information Only***
- **Questions and Comments**





ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Available at www.ACICS.org

To view the Memo:

> Council Actions

>> Memorandum to the Field

>>> May 2017

The screenshot shows the ACICS website navigation menu with the following items: Council Actions, Students, Evaluators, Events/Workshops, and News. A dropdown menu is open under 'Council Actions', listing: Memorandum to the Field, Initial Applicant Institutions, Institution Closings, Accreditation Conditioned, Voluntary Withdrawal, Evaluation Schedule, Adverse Actions, Direct or Vacate Show Cause, and Program Level Actions. Below the menu is a banner image of two graduates in caps and gowns. The page title is 'Memorandum to the Field'. The text below the title reads: 'After each Council meeting, ACICS staff will publish a memorandum to ACICS-accredited institutions and other interested parties which includes final criteria changes, proposed criteria changes, and general information for the membership on a number of topics.' At the bottom, there is a date selector showing '2017', 'May', and 'January'.



TOPIC I:

**PROPOSED CRITERIA
REVISIONS & CHANGES**



Proposed Criteria Changes & Revisions

- **Intent to Bar/Debarment Appeal**
- **Review Board Members and Expenses of an Appeal**
- **Institutional Grant Length**
- **Unannounced Visit Fees**
- **Council Hearing Procedures**
- **Revision of Title – Change of Ownership/Control Action**



Proposed Criteria Changes & Revisions

- **Institutional Show-Cause Directives**
- **Revocation Actions**
- **Student Achievement Procedures**
- **Initiation of Distance Education**
- **Denial Actions Not Affecting Overall Accreditation**
- **Substantive and Non-Substantive Changes**
- **Renewal of Accreditation Application Submission**



Proposed Criteria Changes & Revisions

- **Advertising – Third Party Services**
- **Criterion Description - Integrity**
- **“Centrally Controlled Institutions” and “Distributed Enterprise”**



Intent to Bar/Debarment Appeal

Section 2-3-900

The Council proposes to clarify the language surrounding the debarment appeal process. The current language on debarment could be interpreted that an individual or entity may also elect to appeal the debarment action, after an appeal of the intent. The revised language intends to remove this possible interpretation.

Key component:

- The revised language clarifies the procedure that individuals or entities may only appeal the intent to bar.



Review Board Members and Expenses of an Appeal

Sections 2-3-602 and 2-3-608, and Appendix A, Bylaws, Article VII

The Council proposes to clarify language regarding the Review Board of Appeals. The proposed language indicates that a panel of three persons will be selected from a pool of 15 members of the Review Board of Appeals. The order of the types of members has also been reorganized for consistency. In addition, the proposed language clarifies the remittance of a standard hearing fee.

Key components:

- The Review Board consists of 15 members, a panel of which would be selected to consider each case.
- A standard fee will be remitted for the hearing.



Institutional Grant Length

Section 2-1-701 & Section 2-1-702

The Council proposes to reinstitute the determination of grant length at the institutional, rather than at the campus level. That is, the institution (main and its branches) will be awarded a grant of accreditation given that a branch does not hold an accredited status; rather, it is approved within the accredited status of the main campus.

Key components:

- The Council maintains the discretion on the grant length awarded.
- The proposed change would eliminate the ability to award a grant length to a branch campus independently of its main.



Unannounced Visit Fees

Section 2-1-405 and Appendix B

The Council proposes that the Criteria related to charges for unannounced visits be consistent with fees assessed for scheduled visits.

Key components:

- Unannounced visits will be assessed a flat visit fee.
- Failure to pay the fee would be subject to adverse action.



Council Hearing Procedures

Sections 2-3-230, 2-3-500, 2-3-501, and 2-3-502

At its December 2016 meeting, the Council moved to require all show-cause hearings to be in writing unless an in-person hearing is directed by the Council.

Key components:

- The notation “in-writing hearing” is being revised to an “institutional review” and “hearings” reserved for in-person appearances before the Council.
- For institutional reviews, the submission of documentation and fee would replace a notification of the institution’s acceptance.
- Revisions are being considered to the procedures for when the Council requires a hearing in person.



Revision of Title – Change of Ownership/Control Action

Section 2-3-302

The Council proposes a revision to the title of the criterion to better reflect its content.

Key component:

- The title clarifies the denial of reinstatement of accreditation after change of ownership or control, rather than a denial of the change of ownership/control itself.



Institutional Show-Cause and Withdrawal of Approval

Sections 2-3-230, 2-3-231, 2-3-400, 2-3-401, 2-3-402, and 2-3-403

The Council proposes to clarify language regarding a show-cause directive on a branch campus.

Key component:

- A show-cause action may result in the withdrawal of approval of a branch campus or the withdrawal of accreditation of the institution.



Revocation for Failure to Respond to Show-Cause Directive

Sections 2-3-400 and 2-3-401

The Council proposes an additional reason for the revocation action.

Key components:

- A revocation action, which is not appealable, can be taken when an institution fails respond to a show-cause directive.
- Withdrawal actions – revocation and suspension – can be taken at the campus and institution levels.



Student Achievement Procedures

Sections 2-1-809 and 2-2-502 & Appendix L

The Council proposes changes in the Criteria to reflect revisions and clarity in the application of standards and guidelines regarding student achievement.

Key components:

- Clearly outlined expectations with each student achievement action.
- Two sections of the Criteria related to Student Achievement have been revised to remove redundant language.
- A revision to procedural guarantees for withdrawals by suspension to include language for what is now an institutional review.



Initiation of Distance Education

Section 2-2-106

The Council seeks to clarify the language regarding the approval needed to initiate distance education or other new instructional delivery methods.

Key component:

- An institution would be able to directly offer a new online course or program once they have submitted and received approval of a distance education application without having to first have approval of the program residentially.



Denial Actions not Affecting Overall Accreditation

Section 2-3-303

The Council proposes a revision to the language that clarifies the institution's right to object to other denial actions of requested substantive changes.

Key component:

- Institution can present its case for reconsideration if an application for a new program or any substantive change is denied.



Substantive and Non-Substantive Changes

Sections 2-2-101, 2-2-109, 2-2-121, and 2-2-151

The Council proposes to recognize that a 25 percent decrease to a program's clock or credit hours is also a substantive change. The revised wording would include a 25 percent or greater change (to include increase and decrease).

Key components:

- Campuses must notify ACICS of non-substantive changes prior to implementation.
- ACICS must be notified when a change has not been implemented within a year.



Renewal of Accreditation

Application Submission

Section 2-1-300 and 2-1-301

The Council proposes to allow campuses to submit all renewal applications and fees three months before the start of the campus's assigned review cycle rather than September 30th prior to the renewal year.

Key components:

- Information submitted closer to the visit would give ACICS a more accurate picture of the campus.
- Once self-study materials are submitted, substantive changes would not be allowed before the visit.



Advertising – Third Party Services

Appendix C – Institutional Publications Requirements

The Council proposes to eliminate one element of Appendix C referencing disclosure of third party services for advertising.

Key component:

- Catalog and/or other advertising materials no longer have to include services by third parties.



Criterion Description - Integrity

Section 3-1-202

The Council proposes to revise the language for the criterion regarding integrity of an institution to include capability of management since the subsections include the assessment of both the integrity and capability of the institution's administration.

Key component:

- Criterion title includes the evaluation of institutional capability in addition to integrity.



“Centrally Controlled Institutions” and “Distributed Enterprise”

Sections 1-3-200, 1-3-203, 2-1-100, 2-1-301, 2-1-402, 2-1-503, 2-1-601, 2-1-801, 2-1-802, 2-2-203, 3-1-202, and Glossary

The Council proposes to remove all references to “Centrally Controlled Institutions” and “Distributed Enterprises” given that ACICS is no longer pursuing the recognition of this type of entity.

Key component:

- The deletion of all references of these terms will provide clarity and consistency related to classifications of institutions.



TOPIC II: FOR INFORMATION ONLY



For Information Only

- **Moratorium on Doctoral Degrees**
- **Automated Withdrawal of Aged Applications**
- **Placement Verification Program (PVP)**
- **The Quarterly Accountability Report**
- **Annual Meeting**
- **Information Webinar**



Moratorium on Doctoral Programs

At the April 2017 meeting, the Council voted unanimously that, effective April 4, 2017, the moratorium approved by the Council on December 5, 2016, is now permanent and ACICS will no longer accept applications for doctoral programs.

All current institutions with existing doctoral programs have until December 31, 2019, to:

- 1) teach-out their currently enrolled doctoral students in an orderly manner; or
- 2) move from ACICS to another institutional accrediting agency.

Institutions will be required to prominently post and distribute notice to current and prospective students to advise them of this course of action, with a credible plan and path to completion for all enrollees going forward. If any of these conditions are not satisfied, the institution will be subject to an adverse action.



Automated Withdrawal of Aged Application

- A large of number of applications are still pending, requiring additional information or response from the campus subsequent to the initial submission for approval.
- The Council has concluded that the documents in such applications to be outdated and unusable for consideration.
- Any applications submitted prior to May 1, 2016, that have had no activity from the institution within the past year, will be **marked for withdrawal.**



ACICS PLACEMENT VERIFICATION PROGRAM (PVP) UPDATE

- Campuses are now able to contest placements that ACICS has marked as INVALID, via the system.
- Contested decisions MUST INCLUDE supporting documentation for consideration.
- A placement may only be contested once and the decision of the review panel is **final**.
- Instruction on contesting the placements can be found on the PVP web site.



The Quarterly Accountability Report

- Beginning with the first quarter of the 2018 reporting period, all campuses will be required to submit a quarterly accountability report.
- The report will be due four months following the conclusion of the quarter. That is, July – September 2017 (due February 1, 2018); October – December 2017 (due May 1, 2018); January – March 2017 (due August 1, 2018); and April – June 2018 (due November 1, 2018).



ACICS Annual Business Meeting

- Facilitated via webinar on June 21, 2017, from 1pm – 3pm EDST.
- This is a members-only session and invitations will be sent under separate email.
- Reports will be given by the Interim President, Council Chair, and Treasurer.



Informational Webinar – 2017 CAR, 2018 Quarterly Reports, PVP

- Facilitated via webinar on May 25, 2017, from 3:30pm – 5pm EDST.
- Invitation has been sent out and representation from each campus is highly recommended.
- Guidance on completing the reports will be provided.



Question & Answer



Feedback/Participation from the Field

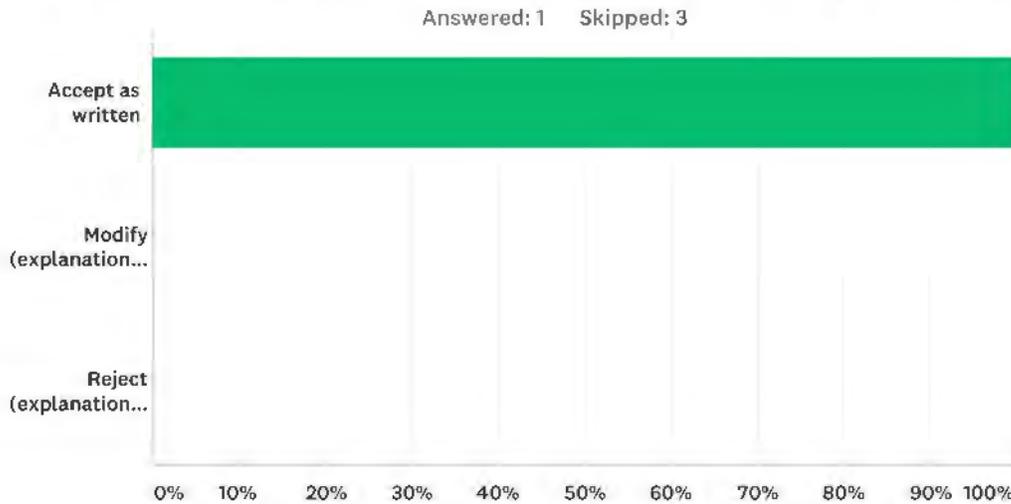


Your feedback on the proposed changes are critical to the Council's consideration and should be provided no later than **Friday, June 30, 2017**, via the link below:

<https://www.surveymonkey.com/r/WEBQA>



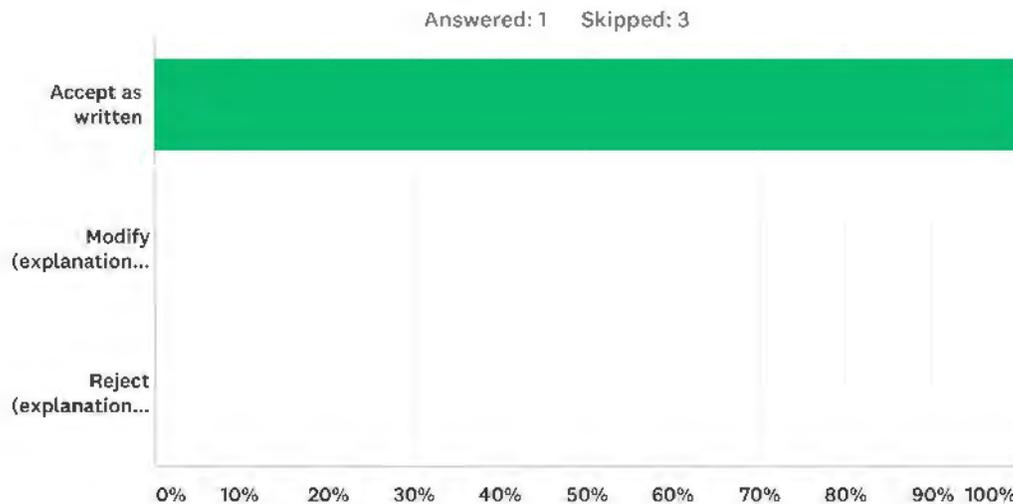
Q3 A. Intent to Bar/Debarment Appeal: The Council proposes to clarify the language surrounding the debarment appeal process. The revised language clarifies the procedure that individuals or entities may only appeal the intent to bar. The Criteria on debarment could be interpreted that an individual or entity may elect to appeal the debarment action. The revised language intends to remove this possible interpretation.



Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
TOTAL	1

#	Explanation	Date
1	Debarment is the most severe negative action which could be administered. I personally was part of a debarment action and am aware of its ramifications. I support any clarification to better amplify the actions being administered.	5/10/2017 2:36 PM

Q4 B. Review Board Members and Expenses of an Appeal: The Council proposes to clarify language regarding the Review Board of Appeals members. The proposed language indicates that a panel of three persons will be selected from a pool of 15 members of the Review Board of Appeals. The order of the types of members has also been reorganized for consistency. In addition, the proposed language requires a remittance of a standard hearing fee.

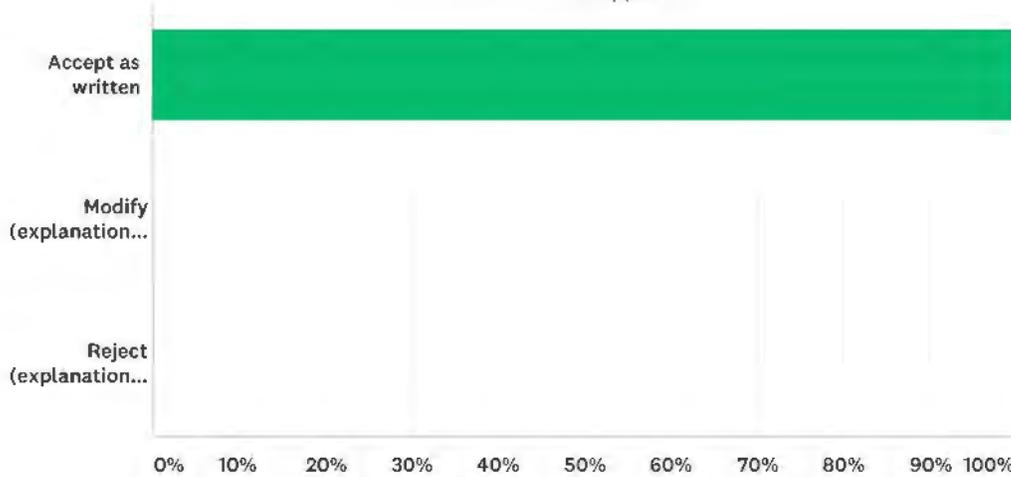


Answer Choices	Responses	Count
Accept as written	100.00%	1
Modify (explanation needed)	0.00%	0
Reject (explanation needed)	0.00%	0
TOTAL		1

#	Explanation	Date
1	Fees for any school should be clarified within a range. Budgeting for the fees allows schools to plan for possible expenses.	5/10/2017 2:36 PM

Q5 C. Institutional Grant Length: The Council proposes to reinstitute the determination of grant length at the institutional level rather than at the campus level. The proposal would require each branch campus to have the same grant length as its main campus.

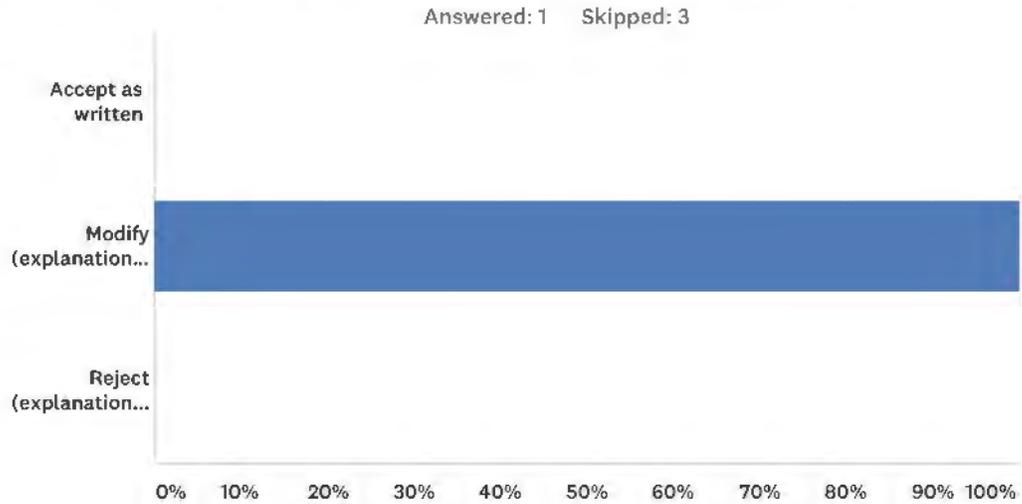
Answered: 1 Skipped: 3



Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
TOTAL	1

#	Explanation	Date
1	I believe this was the original intent when schools were held to the deferral of one school/campus includes all associated campus members.	5/10/2017 2:36 PM

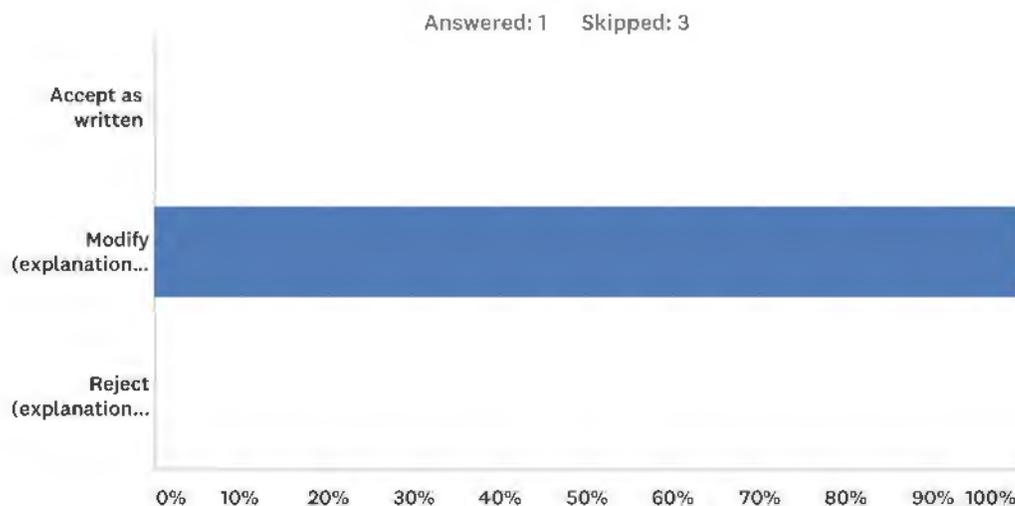
Q6 D. Unannounced Visit Fees: The Council proposes that the Criteria related to charges for unannounced visits be consistent with fees assessed for scheduled visits. Therefore, the proposed change is that unannounced visits also be assessed a fee. Failure to pay the fee would be subject to adverse action.



Answer Choices	Responses
Accept as written	0.00% 0
Modify (explanation needed)	100.00% 1
Reject (explanation needed)	0.00% 0
TOTAL	1

#	Explanation	Date
1	Fees are dependent on travel, lodging, honorariums and food. Fees should exceed a reasonable level.	5/10/2017 2:36 PM

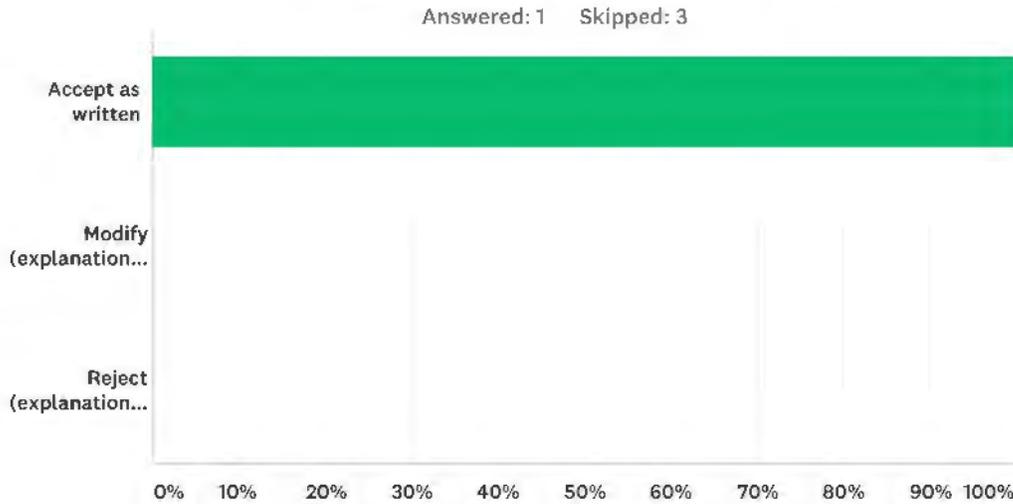
Q7 E. Council Hearing Procedures: At its December 2016 meeting, the Council moved to require all show-cause hearings to be in writing unless an in-person hearing is desired by the Council. The proposed changes in the Criteria reflect this decision with the change of “in-writing hearing” to “institutional review.” For institutional reviews, the submission of materials and fee would replace a notification of acceptance as confirmation of the understanding of its show-cause status, and institutions are able to submit evidence already considered. The proposed changes also include procedures for when the Council requires a hearing in person.



Answer Choices	Responses
Accept as written	0.00% 0
Modify (explanation needed)	100.00% 1
Reject (explanation needed)	0.00% 0
TOTAL	1

#	Explanation	Date
1	How does this satisfy due process if a campus request a hearing?	5/10/2017 2:36 PM

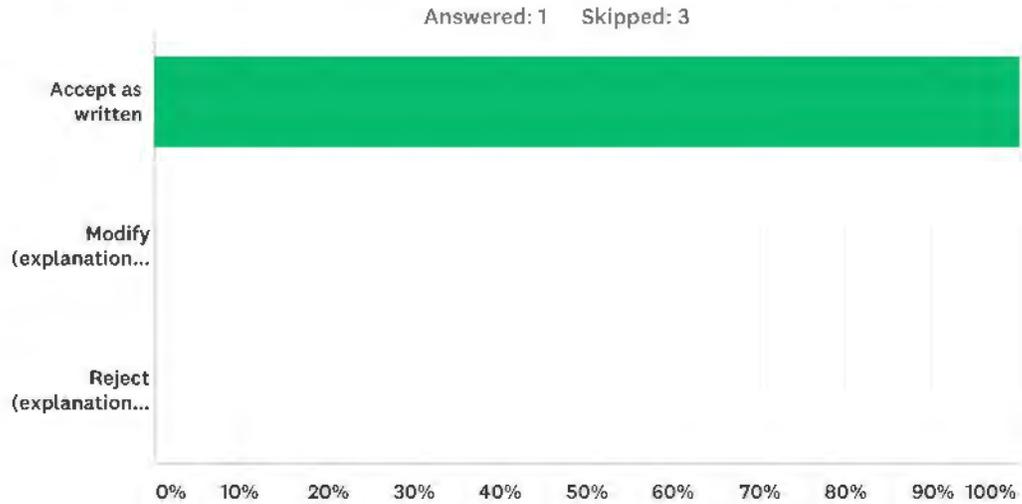
Q8 F. Revision of Change of Ownership/Control Action: The Council proposes a revision to the title of the Criteria regarding denial of renewal of accreditation to reflect the contents of the criterion. The title clarifies the denial of renewal of accreditation after change of ownership or control.



Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
TOTAL	1

#	Explanation	Date
	There are no responses.	

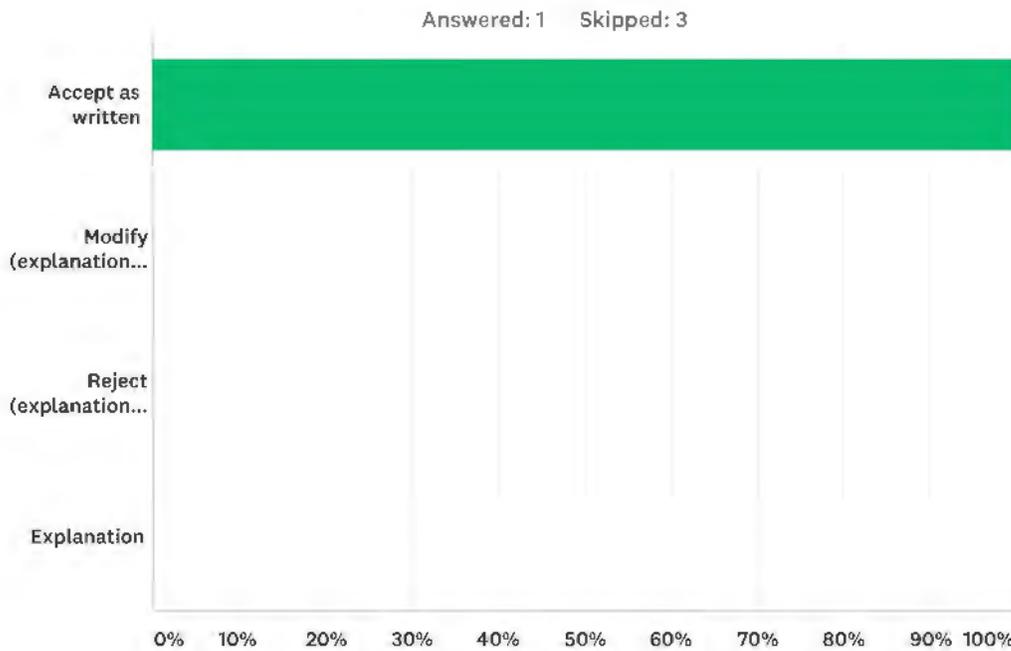
Q9 G. Institutional Show-Cause & Withdrawal of Approval: The Council proposes to clarify language regarding show-cause concerning a branch campus. The revised language indicates that a show-cause action may result in the withdrawal of approval of a branch campus rather than the withdrawal of accreditation.



Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
TOTAL	1

#	Explanation	Date
	There are no responses.	

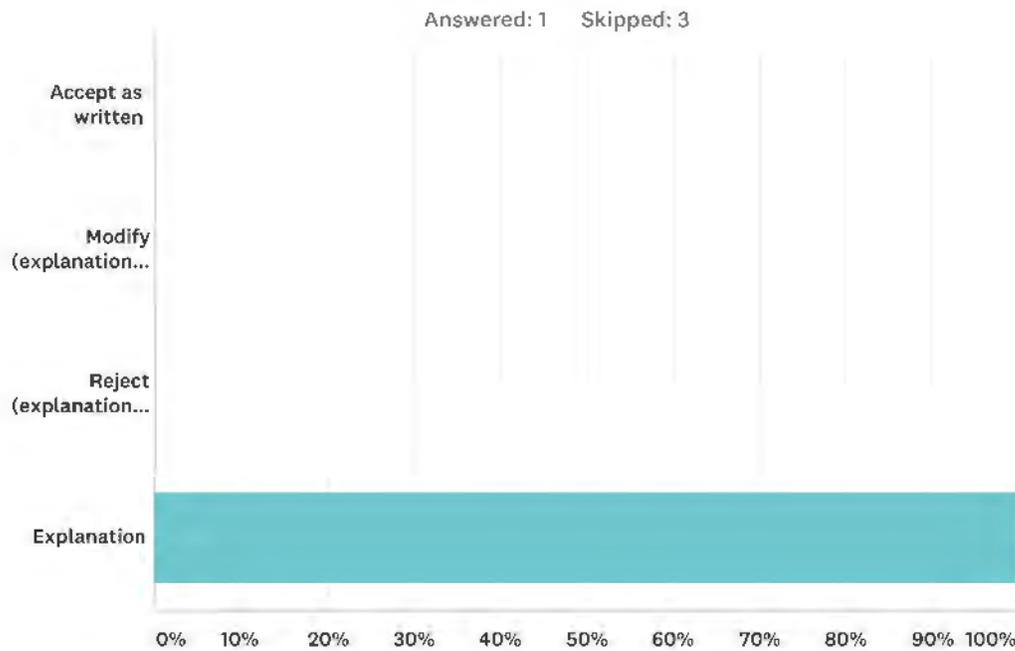
Q10 H. Revocation for Failure to Respond to Show-Cause Directive: The Council proposes language in the Criteria which will outline possible consequential actions taken when an institution does not respond to a show-cause directive. The language also allows for withdrawal actions to also be taken at the campus level.



Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	0.00% 0
TOTAL	1

#	Explanation	Date
	There are no responses.	

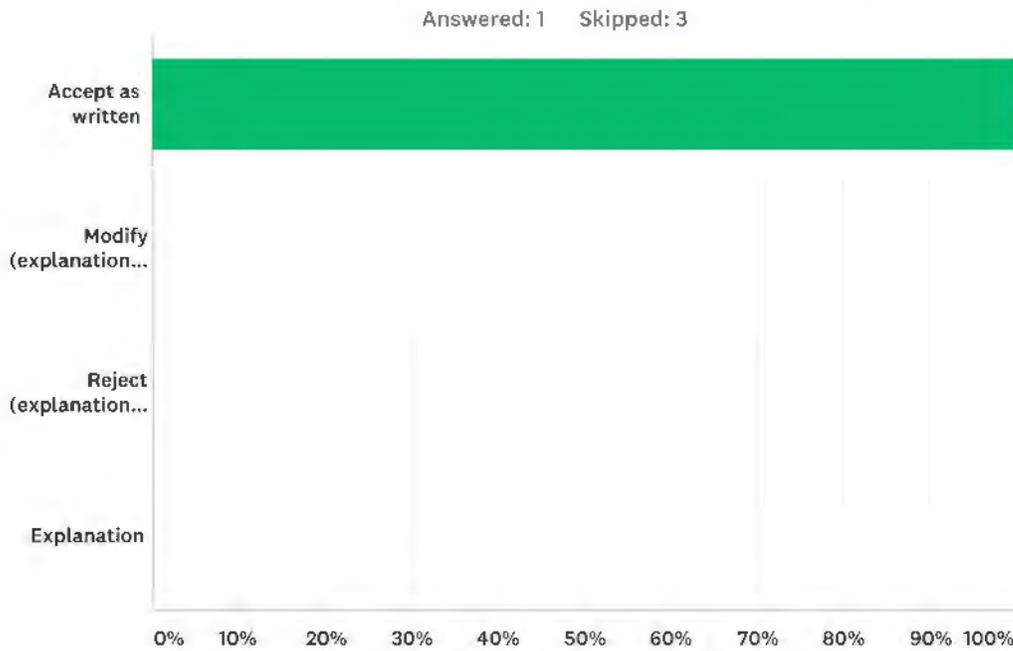
Q11 I. Student Achievement Procedures: The Council proposes changes in the Criteria to reflect recent changes in standards and guidelines regarding student achievement. The proposed language will be consistent with other Council actions and provide clarity on its expectations with each action. In addition, two sections of the Criteria have been revised for efficiency and a revision was made to procedural guarantees for withdrawals by suspension.



Answer Choices	Responses
Accept as written	0.00% 0
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	100.00% 1
TOTAL	1

#	Explanation	Date
1	Student achievement varies demographically across the United States. We have always got ourselves into achievement reporting issues when comparisons are made for schools and communities with different student body demographics. Student achievement should be measured on agreed upon competencies by career milestones throughout the educational experience. All syllabi should represent these competencies. Outcome based education reveals program and school success with retention, pass-fail and student attendance.	5/10/2017 2:36 PM

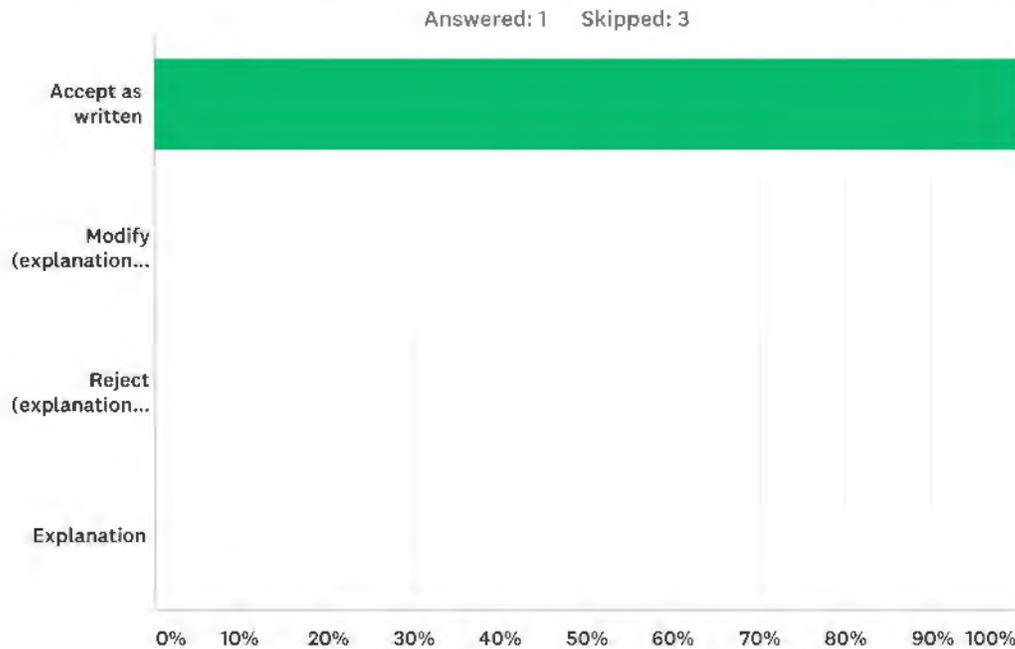
Q12 J. Distance Education Approval: The Council seeks to clarify the language regarding distance education or other new instructional delivery methods.



Answer Choices	Responses	
Accept as written	100.00%	1
Modify (explanation needed)	0.00%	0
Reject (explanation needed)	0.00%	0
Explanation	0.00%	0
TOTAL		1

#	Explanation	Date
	There are no responses.	

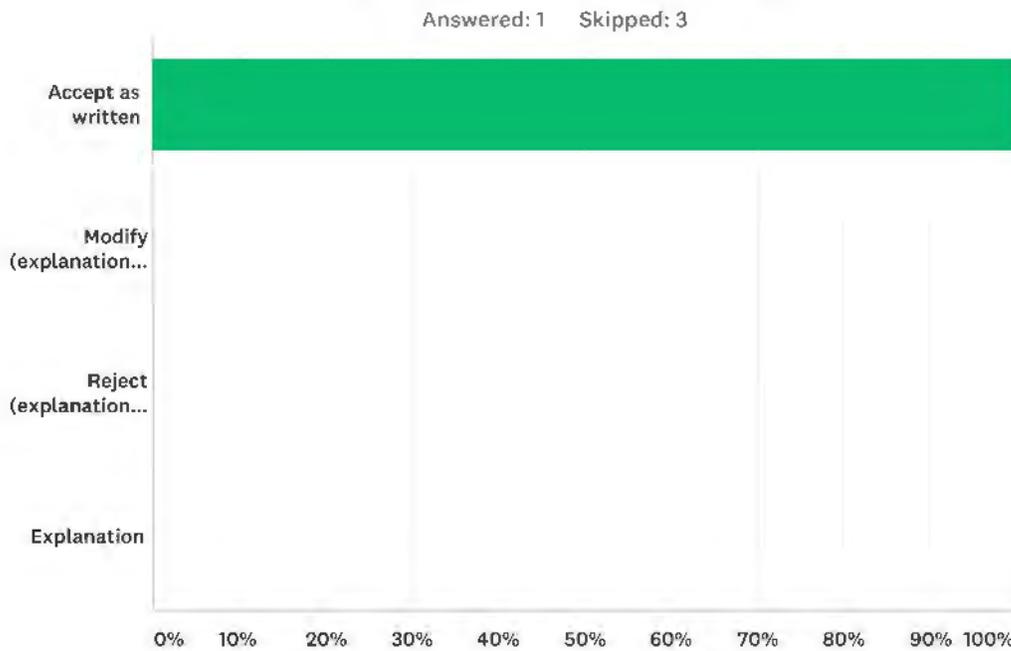
Q13 K. Denial Actions Not Affecting Overall Accreditation: The Council proposes that institutions may respond to denial actions, including those based on substantive changes.



Answer Choices	Responses	Count
Accept as written	100.00%	1
Modify (explanation needed)	0.00%	0
Reject (explanation needed)	0.00%	0
Explanation	0.00%	0
TOTAL		1

#	Explanation	Date
	There are no responses.	

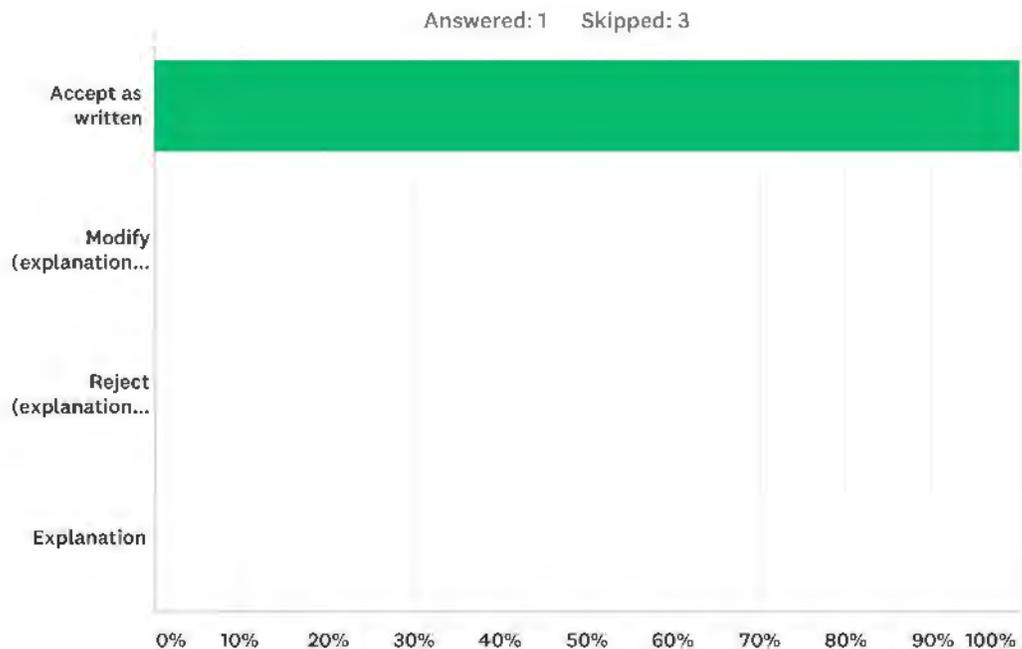
Q14 L. Substantive and Non-Substantive Changes: The Council proposes to add a 25 percent decrease change to a program’s clock or credit hours to the list of substantive changes. The revised wording would include a 25 percent or greater change (to include increase and decrease). In addition, the Council proposes that campuses must notify ACICS of non-substantive changes prior to implementation and notify ACICS when a change has not been implemented within a year.



Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	0.00% 0
TOTAL	1

#	Explanation	Date
	There are no responses.	

Q15 M. Renewal of Accreditation Application Submission: The Council proposes to allow campuses to submit all renewal applications and fees two to three months before the start of the campus’s assigned review cycle rather than September 30th prior to the renewal year. Information submitted closer to the visit would give ACICS a more accurate picture of the campus. In addition, Council proposes that once self-study materials are submitted, substantive changes would not be allowed before the visit.

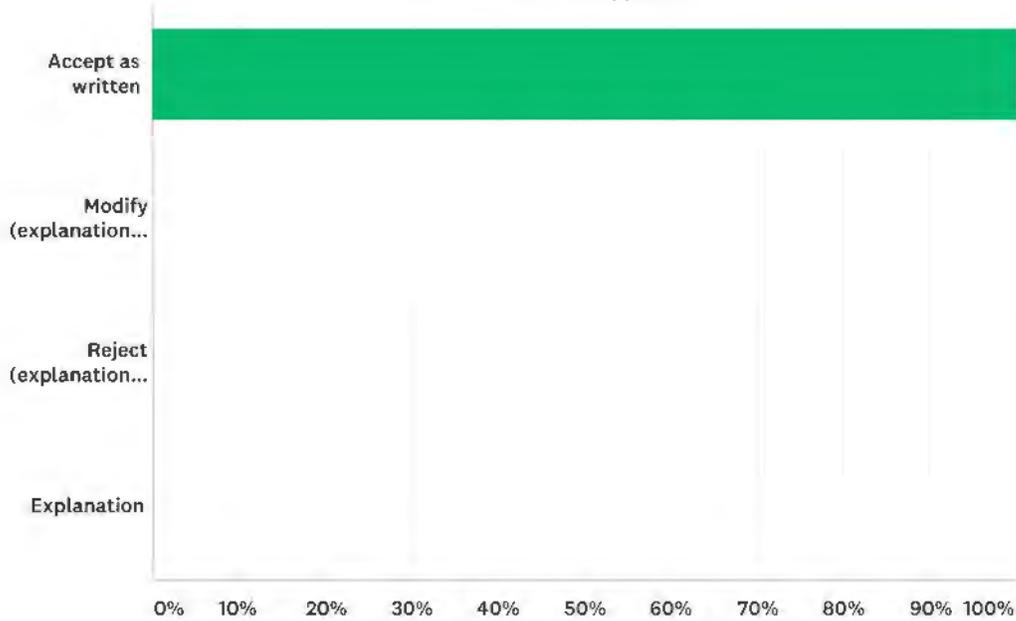


Answer Choices	Responses
Accept as written	100.00% 1
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	0.00% 0
TOTAL	1

#	Explanation	Date
	There are no responses.	

Q16 N. Advertising – Third Party Services: The Council proposes to eliminate one element of Appendix C regarding disclosure of third party services.

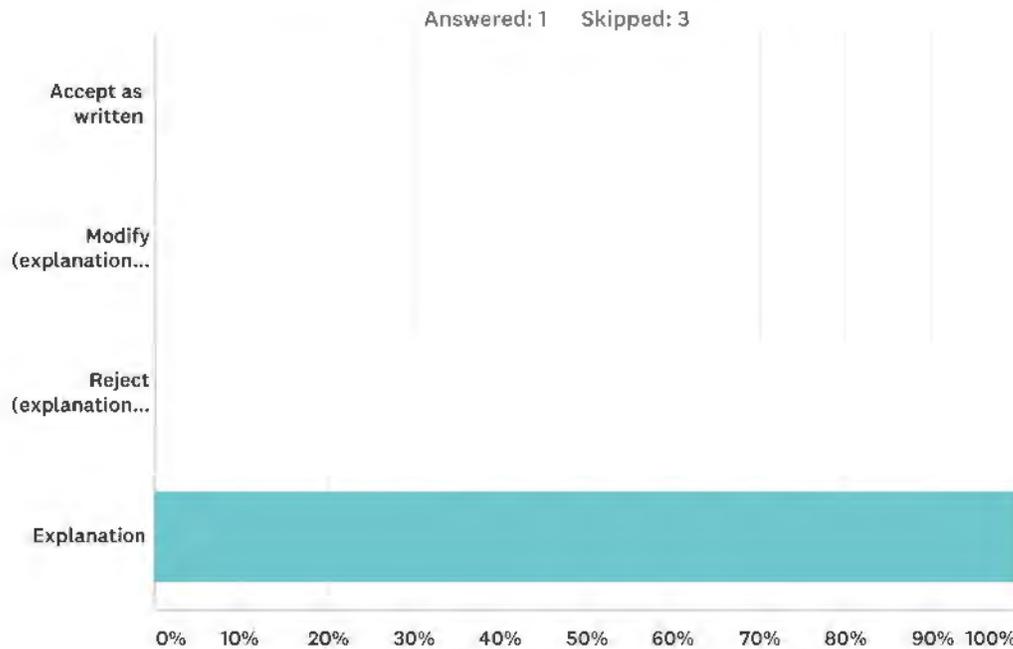
Answered: 1 Skipped: 3



Answer Choices	Responses	
Accept as written	100.00%	1
Modify (explanation needed)	0.00%	0
Reject (explanation needed)	0.00%	0
Explanation	0.00%	0
TOTAL		1

#	Explanation	Date
	There are no responses.	

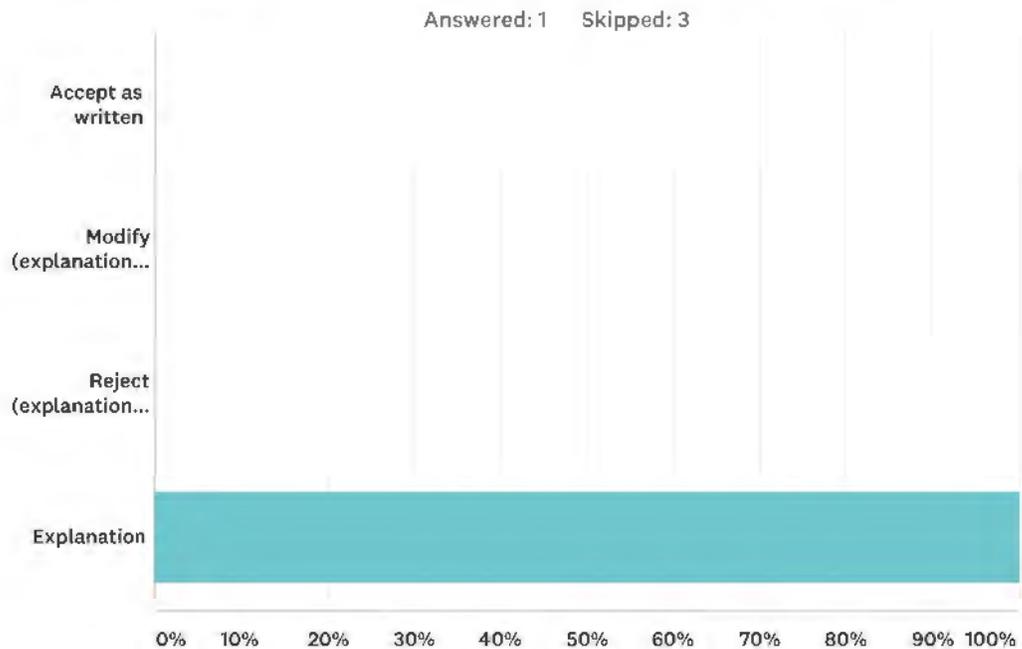
Q17 O. Integrity: The Council proposes to revise the language for the criterion regarding integrity of an institution to include capability of management.



Answer Choices	Responses
Accept as written	0.00% 0
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	100.00% 1
TOTAL	1

#	Explanation	Date
1	I don't disagree with the concept of this intention. Remember that with large multi-campus organizations (publicly traded) will have an existence of management at the corporate level and campus. Sometimes the capability at the campus level may be sufficient but the corporate level has a negative influence on their functional ability to comply. I am aware of many great schools operating in the shadow of potential management at a corporate level which has negative compliance potential. Does this criteria take into account all lines of authority and management?	5/10/2017 2:36 PM

Q18 P. Classification of “Centrally Controlled Institutions” and “Distributed Enterprise”: The Council proposes to provide consistency within the Criteria regarding “Centrally Controlled Institutions” and “Distributed Enterprises.” The revision of all instances of these terms will provide a consistency in terminology related to classifications of institutions.



Answer Choices	Responses
Accept as written	0.00% 0
Modify (explanation needed)	0.00% 0
Reject (explanation needed)	0.00% 0
Explanation	100.00% 1
TOTAL	1

#	Explanation	Date
1	For classification purposes I agree, don't forget the influence the corporate executives authority they have outside of the institutional classification.	5/10/2017 2:36 PM

Case Name: *In the Matter of* Accrediting Council for
Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent
Colleges and Schools

Exhibit No.: B-O-115



MEMORANDUM TO THE FIELD

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM: Accrediting Council for Independent Colleges and Schools
DATE: February 5, 2018
SUBJECT: The Memorandum to the Field containing Other Information for ACICS-Accredited Institutions and Other Interested Parties

Specific areas of the ACICS *Accreditation Criteria* that had been presented to the Council through its routine systematic review process have been finalized and made effective following the August 2017 meeting. The 2018 systematic review process is currently underway, with proposed areas for revision up for review and discussion at the Council's February 2018 Policy Meeting. This review process has facilitated feedback from all key stakeholders including state agencies, third-party experts, institutional representatives, and students.

Consequently, at its December 2017 meeting, there were Criteria changes up for proposed or final review. The following section of the Bylaws has been revised and is detailed here for information only. Additionally, the Council has drafted guidelines on graduation rates for the membership's information and advisement.

Further, additional information and reminders concerning the ACICS Quarterly CAR submission and PVP processes are also provided here for information only.

For Information Only

1. Bylaws Revisions

The ACICS Board of Directors approved revisions to the bylaws as they relate to Council composition to adapt to our changing number of institutions, selection, terms, and vacancies.

The following revisions were effective December 6, 2017 (new language is underlined deleted language is ~~struck through~~):

ARTICLE III Council

Section 1-Composition. The Council shall consist of ~~the elected and appointed~~ generally representing member institutions; ~~appointed~~ generally appointed-commissioners-at-large, ~~who are unaffiliated with a member institution;~~ and public representatives ~~formerly employed at a public institution.~~ It shall be comprised of ~~no less than nine (9) and no more than fifteen (15) commissioners, at least thirty (30) percent of whom shall be elected by the membership and the balance of whom shall be appointed by the Council,~~ and it shall include at least two academic representatives and at least two administrative representatives.

Academic representative is defined as someone currently or recently directly engaged in a significant manner in postsecondary teaching and/or research. Administrative representative is defined as someone currently or recently directly engaged in a significant manner in postsecondary institutional or programmatic administration. At least forty (40) percent of the ~~appointed~~ commissioners shall be public representatives, ~~not to exceed seven. Notwithstanding the foregoing, an elected commissioner may be replaced by an appointed commissioner for the remainder of the elected commissioner's term in the event of a vacancy.~~

Section 2—Powers and Duties. Responsibilities of the Council shall be to:

- (a) promulgate standards of accreditation and establish eligibility conditions, policies, and procedures for accreditation;
- (b) take final action on initial grants of accreditation;
- (c) take final action on denial, suspension, and withdrawal motions;
- (d) provide mechanisms for appeals and dispute resolution to ensure due process in resolution of conflicts between members and the Council;
- (e) provide to members appropriate accreditation-related services such as consultation, accreditation process workshops, and training opportunities for evaluators;
- (f) disseminate information on standards, procedures, and activities;
- (g) monitor compliance with the standards;
- (h) receive and act on other applications;
- (i) issue show-cause directives;
- (j) serve as liaison to recognition agencies or bodies;
- (k) issue a list of accredited colleges, schools, and organizations;
- (l) assess and collect fees from members;
- (m) take final action on the strategic plan; and
- (n) exercise other powers and duties incidental to the foregoing.

Section 3—Chair and Vice Chair. The Chair of the Council shall be the Vice Chair from the previous year. The Council shall elect the Vice Chair of the Council, who will become Chair in the subsequent year, annually by majority vote of the commissioners present and voting at a duly constituted meeting of the Council.

ARTICLE IV

Elections, Terms, Vacancies, Removal, Resignations, and Compensation

Section 1—Elections. Elections shall be held annually, in years when elected positions must be filled, for the selection of persons each of whom shall serve as elected commissioners on the Council and the Board. No person shall serve as a member of the Council and not of the Board, nor shall any person other than the President serve as a member of the Board and not of the Council.

Section 2—Eligibility for Election and Voting. Any person employed by a member institution in good standing and meeting other eligibility criteria is eligible to run for Council and Board membership. Each main campus is entitled to one Designated Delegate who is authorized to vote in all elections on behalf of

that member institution as well as in all other matters requiring a vote of the members. Appointment of the Designated Delegate is made by the chief executive officer of the institution by notice in writing to ACICS. ~~Multiple campuses under common ownership may be represented by one designated delegate, who shall be empowered to cast votes on behalf of each main campus. Changes of Designated Delegate shall be made in writing at least fifteen (15) days prior to the date of any scheduled election, which becomes the record date for determining eligibility to vote. Results of elections shall be certified by the Executive Committee.~~

~~Section 3—Voting Procedures.~~ Specific election procedures concerning candidate qualifications, deadlines for registration, and dates and methods of balloting and absentee balloting shall be developed by the Board and may vary from election to election. Electronic voting, properly secured, shall be allowed. The following general procedures shall apply to all voting:

- ~~(a) There shall be no more than two candidates nominated for each elective position by the Nominating Committee;~~
- ~~(b) Nominations by petition for each elective position will be permitted if such petition (i) is received at least 45 days prior to the date of the election, (ii) contains the names and signatures of Designated Delegates representing at least ten percent of the institutions that are members of ACICS, (iii) demonstrates that the petitioner satisfies the eligibility requirements contained in Section 2 of this Article, and (iv) meets any other procedural requirements which may be established by the Board;~~
- ~~(c) Every member, if properly registered and current with financial obligations, shall have the opportunity to vote;~~
- ~~(d) Proxy voting is not permitted in elections;~~
- ~~(e) No more than one person from any institution or group of institutions commonly owned may serve at any one time on the Council;~~
- ~~(f) Voting on behalf of multiple members under common ownership and control by one Designated Delegate may be permitted on membership-wide matters. The multiple members represented by one Designated Delegate must be recorded with the Secretary prior to the vote, and the multiple members represented by a single Designated Delegate shall count toward a quorum;~~
- ~~(g) Only the Designated Delegate of each member is eligible to vote;~~
- ~~(h) Voting shall be by secret ballot, which includes secure electronic balloting;~~
- ~~(i) A majority vote, unless otherwise provided by these Bylaws, shall decide all non-candidate matters; and~~
- ~~(j) A plurality vote shall decide all candidate elections.~~

~~Section 4-1—Assumption of Office.~~ New commissioners shall assume office on January 1 of the calendar year following election or appointment, unless otherwise provided for by the Council. Incumbent commissioners will remain in office until new commissioners are seated.

~~Section 52—Terms.~~ The term of service as a commissioner shall be five years. A person elected or appointed to fill a term of less than two and one-half years is entitled to apply for nomination and election or appointment to a full term. Upon completion of a commissioner's term, the commissioner shall not be eligible to serve another full term through election or appointment until three (3) years have elapsed. However, a commissioner appointment to complete a vacated term, in full or part, is not subject to the three-year (3) waiting period. A commissioner who is elected to the Office of Vice Chair in the final year of that commissioner's term shall have that term extended for one (1) year to allow service as the Chair of the Council to be fulfilled. If nominated, public representatives may serve one additional appointment

without the three-year (3) waiting period.

Section 63–Vacancies. Where a vacancy exists, the Nominating Committee shall review and make recommendations to the Council for its consideration.

Section 74–Resignations. Resignation from service as a commissioner and Director may be voluntarily tendered at any time. The resignation becomes effective upon receipt of written notice by the Chair of the Board and Council or the President. Automatic tendering of resignation is required under the following circumstances or conditions:

- (a) denial, suspension, or revocation of accreditation at the institution with which affiliated;
- (b) cessation or announced cessation of operations at such institution;
- (c) filing for reorganization or bankruptcy by such institution or its parent corporation;
- (d) debarment by the U.S. Department of Education from employment at any institution participating in federal student funding programs;
- (e) indictment for a criminal offense;
- (f) change of control or ownership at the institution with which affiliated;
- (g) failure of such institution to meet its financial obligations to ACICS which results in loss of membership;
- (h) change in employment status (other than internal); and
- ~~(i) change in Designated Delegate status; and~~
- (j) the commissioner is employed by an institution that is deemed to be under sustained and serious scrutiny regarding noncompliance with ACICS standards and requirements.

Not all of the foregoing necessarily will result in acceptance of resignation but must be considered by the Council before service can continue.

Section 85–Removal. A commissioner may also be removed by not less than a two-thirds (2/3) vote of the Council for breach of any code, canon, or tenet of ethics formally adopted pursuant to these Bylaws.

Section 96–Compensation. Commissioners shall serve without compensation. Public representatives shall receive honoraria for service in such amounts as the Board shall fix. Commissioners, as well as members of committees, if so provided in advance, shall be reimbursed for expenses incurred in performance of authorized duties.

2. Graduation Rate Guidelines

The Council, following its analysis of graduation data collected from the 2017 Campus Accountability Report, determined that the data were still preliminary in nature and not reliably sufficient to establish Graduation Rate Standards. However, the Council has determined that the following guidelines are appropriate, based on its review of similar guidelines and research results in the industry, to provide institutions with an initial introduction to the **minimum expectations for graduation rate outcomes.**

Credential	Recommended Minimum Graduation Rate
Certificate/Diploma	50%
Associate's degree	45%
Bachelor's degree	40%
Master's degree	45%

Given that graduation rates is one of the required student achievement outcomes to be evaluated in the campus effectiveness plan (See Section 3-1-111 & Appendix K), the Council will take graduation rates into consideration as it makes accreditation decisions.

3. Placement Verification Program (PVP) Resources

In light of the changes and expectations of the PVP as it impacts the Campus Accountability Report(CAR) and placement outcomes, ACICS has developed a "PVP Resources" section of Member Center to provide all campuses with current information on the program. To access these resources, institutions must log into their accounts and the link will be on the left tool bar.

If you have any questions about the memorandum to the field, please contact:

Ms. Karly Zeigler
Manager of Institutional Compliance
Kzeigler@acics.org

Case Name: *In the Matter of* Accrediting Council for
Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent
Colleges and Schools

Exhibit No.: B-O-116

		Following Year 2 (2016, 2015, & 2014)		Following Year 1 (2016 & 2015)		Current Submission (2016)		
		Retention	Placement	Retention	Placement	Retention	Placement	Licensure
Campus	Withdrawal by Suspension	0	3	1	1*	0	0	
	Withdrawal by Suspension but in Teach out							
	Show-Cause			6	3	3	12	
	Show-cause but in Teach out			1	8	9	1	
	Compliance Warning					8	13	
	Compliance Warning but in Teach out							
	Reporting					109	86	
	Reporting but in Teach out					35	27	
Program	Withdrawal of Approval	81	91	34	34	0	0	
	WofA - Appealing	7	6	7	7	0	0	
	WofA - Submitted prog. Term			20	14	0	0	
	WofA - No Correspondence	1	1	0	11	0	0	
	Withdrawal of Approval but in Teach Out			25	25	0	0	
	Show-Cause			69	18	35	111	10
	Show-Cause but in Teach out			26	8	21	22	24
	Compliance Warning					172	92	27
	Compliance Warning but in Teach out					62	54	4
	Reporting					478	385	50
	Reporting but in Teach out					22	20	16

- Voted in February, to be reviewed in August
- Voted in February, reviewed in April
- Voted in December, reviewed in April
- In Teach-out, not reviewed
- Voted in December, reviewed by Council in March
- Voted in April, to be reviewed in August.
- Monitoring, no action required
- Voted in February, reviewed in August w/ the exception of programs that have been terminated. Those were vacated in June.
- Voted In Feb, to be reviewed in August
- No follow-up submission required or additional action required.

* Does not include the one international school which Council voted to not place on adverse but to send special letter requesting documentation of compliance with the placement standards.



December 28, 2016

ID CODE 00010101(BC)

Ms. Michelle Lawrence
Director
Everest University - Brandon
3924 Coconut Palm Drive
Tampa, FL 33619

brandon_acics@zenith.org

Subject: Program-Level Withdrawal of Approval

Dear Ms. Lawrence:

The Council has reviewed the Campus Accountability Reports (CAR) for the last three (3) reporting periods – 2014, 2015, and 2016. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

- The following programs are significantly out of compliance with ACICS standards for student achievement and have been underperforming for the last three years with its retention and placement rates, and at this time it has been determined to have little or no chance of coming into compliance within the maximum time frames (Section 2-1-809).

Retention Performance

Program Name	Credential	2014 Rate	2015 Rate	2016 Rate
Accounting	Academic Associate's Degree	46%	42%	45%
Business	Academic Associate's Degree	45%	31%	39%
Computer Information Science	Academic Associate's Degree	50%	37%	40%
Criminal Justice	Academic Associate's Degree	45%	32%	42%

Paralegal	Academic Associate's Degree	49%	40%	57%
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Placement Performance

Program Name	Credential	2014 Rate	2015 Rate	2016 Rate
Computer Information Science	Academic Associate's Degree	32%	47%	29%
Criminal Justice	Academic Associate's Degree	39%	30%	50%
Criminal Justice	Bachelor's Degree	50%	45%	21%
Criminal Justice	Master's Degree	29%	19%	26%
Massage Therapy	Certificate/Diploma	58%	35%	35%
Paralegal	Bachelor's Degree	50%	42%	38%
Paralegal	Academic Associate's Degree	44%	37%	11%

Council Action

The Council considers student achievement outcomes to be of the utmost importance, and due to the significant nature in which the campus is out of compliance with that standard, the Council acted to withdraw approval for the programs. However, this withdrawal of program approval does not apply to currently enrolled students through the period of time during which their teach-out is conducted to its completion.

Termination of Program

In accordance with Section 2-2-503 of the *Accreditation Criteria*, **the campus must cease any new enrollments** in the listed programs on or before the due date for submission of the Program Termination applications, with immediate public notice to all interested parties, including, but not

limited to, students, governmental agencies, the local community, and ACICS. Further, the campus must submit a Program Termination application through its Member Center account for all affected programs within ten (10) days of receipt of this notification. As part of the supporting documentation for the application, the campus must provide the following:

1. Evidence that all interested parties have been notified appropriately. Documentation must include copies of web posting, email blasts, formal communication, catalog revisions, and updates to all advertising materials.
2. An audit of all students currently enrolled in the programs with an indication of expected date of completion/matriculation.
3. A plan to teach-out students in those programs that does not negatively impact their progress to complete the programs in the normal time frame. This plan must include documentation to demonstrate that the campus will continue to offer the educational services to these students, including courses and student and employment support services or provide formal agreements with comparable institutions to facilitate a transfer of these students.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council will be in writing only. Given that the programs have failed to meet standards for three consecutive years, consideration for the appeal will only be given with demonstrable improvements as reported in a mid-CAR (July 1, 2016 – December 31, 2016) with verifiable supporting placement (with waiver) and retention information.

If the campus intends to appeal this withdrawal of program approval action, it must submit all materials by **March 1, 2017**, to car@acics.org. Otherwise, the programs will be considered withdrawn and will be removed from the campus's approved program listing.

Please contact Dr. Terron King at tking@acics.org or (202) 336-6771 if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c. Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Mr. Christopher Miller, U.S. Department of Education, School Participation Division-
Region IV (christopher.miller@ed.gov)
Mr. Samuel Ferguson, Florida Department of Education (joey.smith@fldoe.org)



May 3, 2017

ID CODE 00010452(BC)

VIA E-MAIL AND REGULAR MAIL

acicsbranford@branfordhall.com

Mr. Mitchel Soriano
On-site Administrator
Branford Hall Career Institute
One Summit Place
Branford, CT 06405

Subject: Rescind Withdrawal by Suspension Action and Issue Campus-Level Student Achievement Show-Cause Directive Following a Hearing

Dear Mr. Soriano:

In its letter dated January 11, 2017, the Council notified the institution that it was entitled to a hearing before ACICS on the matter of the withdrawal of its accreditation by suspension as a result of significant noncompliance with student achievement standards, previously issued in a letter dated December 20, 2016. The letter identified that the campus in Branford, Connecticut, which was the main campus of the seven-campus institution, reported placement rates significantly below the Council's 60 percent standard for three consecutive years: 58 percent (2014), 50 percent (2015), and 56 percent (2016). The institution received approval from ACICS on April 4, 2017, for the reclassification of its Branford, Connecticut main campus as a branch campus and its Amityville, New York branch campus as the main campus of the institution.

At its April 2017 meeting, the Council considered the campus's response to the Withdrawal by Suspension action and, as a result of its review, found the following based on the *Accreditation Criteria*:

- The campus failed to provide supportive evidence to demonstrate improved job placement outcomes for its graduates; the institution reported a 58 percent placement rate on its 2017 mid-year Campus Accountability Report (CAR) (Section 2-1-809 and Appendix L).

The campus's placement performance included program-level placement rates ranging between 33 percent and 80 percent, and three of the six programs had less than 10 graduates in each graduating cohort for the program. However, the medical assistant program was the lowest performing (44 percent in 2016), but largest program, and reported a mid-year placement outcome of 65 percent. While all the placements reported have been submitted to the ACICS Placement Verification Program (PVP), they have not all been validated by ACICS. The campus did submit a "Graduate Employment Verification Form" for each of its placements, which were completed and signed by the

graduate's supervisor. Further, the campus submitted a supplemental statement on March 31, 2017, for four additional placements, which it claims would improve the campus-level placement rate to 62 percent, but only one of the four placements has been submitted and validated through the PVP.

Council Action

Therefore, the Council determined that it is appropriate to **rescind the withdrawal by suspension order** and **place the campus on show-cause status** for subsequent review at its August 2017 meeting. While the Council found evidence of recent improvement to these placement rates, it determined that additional information is needed from the campus to confirm the progress of its student achievement outcomes.

In response to the show-cause directive, the campus must submit the following information by **July 7, 2017**:

1. A three-quarter 2017 Campus Accountability Report (CAR) to include all student information between **July 1, 2016 and March 31, 2017**. Documentation to support all reported placements, as reported in the Placement Verification Program (PVP) system, and those graduates reported as not available for placement must be submitted.
2. Evidence that all current and prospective students have been advised of the campus's show-cause status. A copy of the web page, along with the web link, where the disclosure is prominently displayed must be submitted along with copies of its inclusion on admission forms and reference materials.

The response must be submitted via the show-cause online application in the campus's account in Member Center by the date indicated above. Failure to provide all information responsive to the Council's action may result in the withdrawal of your institution's accreditation.

Request for Institution Teach-Out Plan

Further, to ensure that students will receive an appropriate outcome in the event of campus closure, the campus must provide the Council with an Institutional Teach-Out Plan, utilizing the **online Request for Institutional Teach-out Plan application** in Member Center. This *Request for Institutional Teach-Out Plan* must be completed as part of the campus's response to this show-cause directive.

Please contact Ms. Katie Morrison at kmorrison@acics.org or (202) 336-6783 if you have any questions.

Mr. Mitchel Soriano
May 3, 2017
Page 3 of 3

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Anna Maria Nieves, Branford Hall Career Institute, Amityville main campus
(acicsamityville@branfordhall.com)
- Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
- Ms. Betty Coughlin, U.S. Department of Education, School Participation Team, Region I
& II (betty.coughlin@ed.gov)
- Ms. Patricia Santoro, Connecticut Department of Higher Education (psantoro@ctdhe.org)
- Ms. Florence Tate, Accrediting Bureau of Health Education Schools (ftate@abhes.org)
- Ms. Theresa Sisneros, Commission on Accreditation of Allied Health Education
Programs (theresa@caahep.org)
- Ms. Perliter Walters-Gilliam, Vice President – Accreditation (pwgilliam@acics.org)



December 20, 2016

ID CODE 00010452(MC)

VIA E-MAIL AND OVERNIGHT DELIVERY

Ms. Jennifer Williams
Campus Director
Branford Hall Career Institute
One Summit Place
Branford, CT 06405

acicsbranford@branfordhall.com

BRANFORD HALL CAREER INSTITUTE, BRANFORD, CT	ID CODE 00010452(MC)
BRANFORD HALL CAREER INSTITUTE, SOUTHTON, CT	ID CODE 00015722(BC)
BRANFORD HALL CAREER INSTITUTE, WINDSOR, CT	ID CODE 00012823(BC)
BRANFORD HALL CAREER INSTITUTE, SPRINGFIELD, MA	ID CODE 00018785(BC)
BRANFORD HALL CAREER INSTITUTE, WOODLAND PARK, NJ	ID CODE 00255818(BC)
BRANFORD HALL CAREER INSTITUTE, ALBANY, NY	ID CODE 00022387(BC)
BRANFORD HALL CAREER INSTITUTE, AMITYVILLE, NY	ID CODE 00178224(BC)
BRANFORD HALL CAREER INSTITUTE, BOHEMIA, NY	ID CODE 00019180(BC)
BRANFORD HALL CAREER INSTITUTE, WINDSOR, CT	ID CODE 00024281(LS)
BRANFORD HALL CAREER INSTITUTE, SPRINGFIELD, MA	ID CODE 00022439(LS)

Subject: Student Achievement Review – Withdrawal by Suspension

Dear Ms. Williams:

The Council reviewed the institution's three most recent Campus Accountability Reports (CAR), which are available for viewing at your institution's Member Center account. As a result of its review, the Council found the following based on the Accreditation Criteria:

- The campus is significantly out of compliance with Council standards for placement rates and has little or no chance of coming into compliance within the maximum timeframe. The campus reported campus-level placement rates below the Council standard for three consecutive years: 58% (2014), and 50% (2015), and 56% (2016) (Section 2-1-809).

Council Action

The Council regards student achievement outcomes with the utmost importance; and due to the significant nature by which the institution is out of compliance with that standard, the Council acted to withdraw your institution's grant of accreditation by way of suspension, effective upon receipt unless the institution meets the requirements for submission of an appeal.

Ms. Jennifer Williams
December 20, 2016
Page 2

Please notify the Council office in writing within ten (10) days of receipt of this notice if you desire to appeal this decision to the Review Board. The appeal notification must include payment of \$10,000 in the form of a cashier's check, which includes the \$5,000 Review Board fee and a \$5,000 deposit on the expense of the Review Board, which will be reconciled based on actual expenses. The payment is also due within ten (10) days of receipt of this notice. If the appeal notice and appropriate fee are not provided within ten (10) days of receipt of this notice, then the Council's decision is final and will be published and disseminated. If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then the institution would remain accredited through the length of the appeal and more detailed appeal procedures and information will be forwarded to the institution.

Institutional Teach-Out Plan

Finally, if the institution exercises its appeal rights, in compliance with Section 2-2-303 of the *Accreditation Criteria*, the institution is directed to submit to the Council office by **January 31, 2017**, the ACICS Campus Closing Application, which includes an appropriate teach-out plan and all applicable documentation requested by the application.

The Council expects that the institution will take the appropriate steps to assist its students through any transition to successfully complete their programs in an orderly manner. You are advised that Section 2-3-900 of the *ACICS Accreditation Criteria* stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculated at that time of closure.

If the institution elects not to appeal this action, any comments you may wish to make with regard to this decision must be submitted to the Council office within two weeks of the date of this letter. Should you choose to submit any comments, these comments will be included in the summary detailing the reasons for the Council's decision that will be made available to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and the public through www.acics.org.

Ms. Jennifer Williams
December 20, 2016
Page 3

Please contact Dr. Terron King at tking@acics.org or (202) 336-6771 if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Michele Grant, Southington branch campus (mgrant@branfordhall.com)
Ms. Cathlene Schwartzbeck, Windsor branch campus (cschwartzbeck@salter.edu)
Dr. Nicholas Hastain, Springfield branch campus (nhastain@pegschools.com)
Mr. Peter Karas, Woodland Park branch campus (pkaras@pegschools.com)
Mr. Mitchel M. Soriano, Albany branch campus (msoriano@branfordhall.com)
Ms. Anna Maria Nieves, Amityville branch campus (anieves@branfordhall.com)
Ms. Jamie Eastman, Bohemia branch campus (jeastman@branfordhall.com)
Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Ms. Betty Coughlin, U.S. Department of Education, School Participation Team, Region I
& II (Betty.coughlin@ed.gov)
Ms. Patricia Santoro, Connecticut Department of Higher Education (psantoro@ctdhe.org)
Ms. Florence Tate, Accrediting Bureau of Health Education Schools (ftate@abhes.org)
Ms. Theresa Sisneros, Commission on Accreditation of Allied Health Education
Programs (theresa@caahep.org)



April 12, 2017

ID CODE 00015747(MC)

Mr. Terry Weymouth
President
Ridley-Lowell Business & Technical Institute
26 South Hamilton Street
Poughkeepsie, NY 12601

Acics.poughk@ridley.edu

Subject: Program-Level Withdrawal of Approval

Dear Mr. Weymouth:

The Council has reviewed the Campus Accountability Reports (CAR) for the 2015 and 2016 reporting periods and, as a result of its review, has found the following based on the *Accreditation Criteria*:

- The following program is significantly out of compliance with ACICS standards for student achievement and has been underperforming for the last two years, relative to its placement rates, with little or no chance of coming into compliance (Section 2-1-809).

Placement Performance

Program Name	Credential	2015 Placement Rate	2016 Placement Rate
Networking And Technical Support Specialist	Certificate/Diploma	57%	40%

Council Action

The Council considers student achievement outcomes to be of the utmost importance; and due to the significant nature in which the program is out of compliance with that standard, the Council acted to withdraw approval for the program. However, this withdrawal of program approval does not apply to currently enrolled students through the necessary period of time during which an orderly teach-out is to be conducted to its completion.

Termination of Program

In accordance with Section 2-2-503 of the *Accreditation Criteria*, **the campus must cease any new enrollments** in the listed program on or before the due date for submission of Program Termination application, with immediate public notice to all interested parties, including, but not limited to, students, governmental agencies, the local community, and ACICS. The campus must submit a Program Termination application through its Member Center account for each affected program within ten (10) days of receipt of this notification. As part of the supporting documentation for that application, the campus must provide the following:

1. Evidence that all interested parties have been notified appropriately. Documentation must include copies of web posting, e-mail blasts, formal communication, catalog revisions, and updates to all advertising materials.
2. An audit of all students currently enrolled in the program with an indication of the expected date of completion/graduation.
3. A plan to teach-out students in that program that does not negatively impact their progress to complete the program in the normal time frame. This plan must include documentation to demonstrate that the campus will continue to offer the educational services to these students, including all required coursework as well as student and employment support services or the provision of formal agreements with comparable institutions to facilitate a transfer of these students.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of that program and, therefore, is appealable to the Council. Any appeal to the Council will be in-writing only.

Given that the program has failed to meet standards for two consecutive years, consideration for the appeal will only be on the basis of a comprehensive narrative report with clearly detailed operational revisions to strengthen institutional practices, from admissions through graduation. Additionally, the campus must submit a **three-quarter 2017 CAR (July 1, 2016 – March 31, 2017)** with verifiable supporting placement information with waiver documentation. Only placements that have been validated by ACICS through the PVP may be reported.

If the campus intends to appeal this withdrawal of program approval action, it must submit all materials by **May 1, 2017**, to reporting@acics.org. Otherwise, the action will be considered final and the program will be removed from the campus's approved program listing.

Mr. Terry Weymouth
April 12, 2017
Page 3 of 3

Please contact Dr. Terron King at tking@acics.org or (202) 336-6771 if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
- Ms. Betty Coughlin, U.S. Department of Education, School Participation Team, Regions
I and II (Betty.coughlin@ed.gov)
- Dr. Richard Rose, New York State Department of Education (Richard.rose@nysed.gov)



April 21, 2017

ID Code 00022465(MC)

VIA EMAIL AND UPS DELIVERY

ACICS@jmvu.edu

Ms. Alicia Parra Ortiz
President
Jose Maria Vargas University
10131 Pines Boulevard
Pembroke Pines, FL 33026

Subject: Continue Campus-Level Student Achievement Show-Cause Directive

Dear Ms. Ortiz:

At its April 2017 meeting, the Council considered the institution's response to the student achievement show-cause directive, dated December 28, 2016, issued as a result of its placement outcome of 39 percent, as reported on the 2016 Campus Accountability Report (CAR). As a result of its review, the Council found the following based on the *Accreditation Criteria*:

- The institution failed to provide any substantive evidence to demonstrate improved job placement outcomes for its graduates; the institution reported an eight (8) percent placement rate on its 2017 mid-year CAR (Section 2-1-809 and Appendix L). Specifically, of the 11 graduates or completers of its home health aide program, none of the 9 graduates or completers eligible for placement are currently working; and of the 16 graduates or completers of the phlebotomist program, none of the 13 eligible graduates or completers are working.

Further, the Council is concerned that the institution reported 244 students as being "Non-Program Enrollment" (NPE), and only 20 students as being enrolled in a program as of December 31, 2016, according to its mid-year CAR. Without an explanation for the unusually large number of NPE students, compared to the number of program students, this calls into question the accuracy of the information submitted to the Council.

Council Action

Therefore, the Council determined that additional information is needed from the institution and as such acted to **continue the show cause directive** for subsequent review at its August 2017 meeting. In its response to the continued show-cause directive, the institution must submit the following information by **July 7, 2017**:

- A cumulative three-quarter 2017 CAR to include all student information between **July 1, 2016, and March 31, 2017**. Documentation to support all reported placements, as

reported and validated on the Placement Verification Program (PVP) system, and those graduates reported as not available for placement must be submitted.

The institution must also provide a detailed narrative, with supporting documentation, to explain the 244 students and possible additional students, dependent on more recent activity to be reported in the upcoming three-quarter 2017 CAR, classified as NPE. The narrative must advise the Council of what the institution defines as an NPE student, in addition to its rationale for having a majority of NPE students, instead of program students. Documentation must include a comprehensive list, ordered alphabetically by the students' last names, of all students classified as NPE at the institution between July 1, 2016, and March 31, 2017; any records to support the students' NPE status including, but not limited to, both academic transcripts through at least May 13, 2017, and copies of payments for the first 30 NPE students on the list, as evidence of the terms of their attendance and their academic activity while engaged at the institution; and the institution's current catalog, to demonstrate its published policy on the acceptance of NPE students.

The response must be submitted via the citation documents section of the preexisting show-cause online application by the date indicated above. Failure to provide all information responsive to the Council's action may result in the withdrawal of your institution's accreditation.

Request for Institution Teach-Out Plan

Further, to ensure that students will receive an appropriate outcome, in the event of institutional closure, the institution must provide the Council with an Institutional Teach-Out Plan, utilizing the **online Request for Institutional Teach-out Plan application** in the Member Center. This *Request for Institutional Teach-Out Plan* must be completed as part of the institution's response to this continued show-cause directive.

Please contact Ms. Katie Morrison at kmorrison@acics.org if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
- Mr. Christopher Miller, U.S. Department of Education, School Participation Team,
Region IV (christopher.miller@ed.gov)
- Mr. Samuel Ferguson, Florida Department of Education (joey.smith@fldoe.org)



December 28, 2016

ID Code 00010233(BC)

VIA E-MAIL AND UPS DELIVERY

Ms. Erin Easton
On-site Administrator
Miller-Motte College
5000 Market Street
Wilmington, NC 28405

compliance.wilmington@deltaed.com

Subject: Campus-Level Student Achievement Show-Cause

Dear Ms. Easton:

The Council has reviewed the two most recent Campus Accountability Reports (CAR) submitted by the campus for 2015 and 2016, and the campus-level retention rates of 54% (2015) and 56% (2016) are consistently below the Council standard. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

- The campus has consistently not met the Council standards for its retention rates (Section 2-1-809).

Council Action

Therefore, the Council acted to issue your campus a **show-cause directive** subject to a comprehensive response and subsequent review by the Council at the April 2017 meeting. The campus is required to complete and submit the following information:

1. A corrective action plan that has been incorporated into the current Campus Effectiveness Plan (CEP) and includes specific activities that are being implemented to improve the programs that are negatively impacting the campus-level retention performance. The campus must also submit a progress report, corresponding documentation, and any necessary explanatory narrative of all activities implemented and completed for the purpose of retention remediation.
2. A mid-year CAR which includes all student information between **July 1, 2016, and December 31, 2016**, along with evidence that supports the mid-year retention rate to include documentation of all retention exemptions.

3. Evidence that all current and prospective students have been advised of the show-cause status. The following statement must be placed prominently on the campus's website:
 - o Notice to students and prospective students: Miller-Motte College, Wilmington, has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), due to consistent noncompliance with retention standards: 54% (2015) and 56% (2016) as reported on the Campus Accountability Reports.

The information or reports listed above must be received in the Council office electronically via the online Show-Cause application on the campus's account by **February 28, 2017**. At its April 2017 meeting, the Council will review the campus's updated student achievement information and may take further action if the campus has not demonstrated improvement in its student achievement outcomes. Failure to provide all information requested by the Council may result in the suspension of your campus's grant of accreditation.

Program-Level Student Achievement – Withdrawal of Approval

In addition, the Council has reviewed the Campus Accountability Reports (CAR) for the last three (3) reporting periods 2014, 2015, and 2016 and as a result, found the following based on the Accreditation Criteria:

- The following programs are significantly out of compliance with ACICS standards for student achievement and have been underperforming for the last three (3) years, and at this time it has been determined to have little or no chance of coming into compliance within the maximum time frames (Section 2-1-809).

Retention Performance

Program Name	Credential	2014 Rate	2015 Rate	2016 Rate
Business Administration	Academic Associate's	55%	42%	51%
Criminal Justice	Academic Associate's	58%	47%	48%

Placement Performance

Program Name	Credential	2014 Rate	2015 Rate	2016 Rate
Microcomputer Applications	Academic Associate's	50%	33%	57%

Council Action

The Council considers student achievement outcomes to be of the utmost importance, and due to the significant nature in which the campus is out of compliance with that standard, the Council acted to withdraw approval for the programs. However, this withdrawal of program approval does not apply to currently enrolled students through the period of time during which their teach-out is conducted to its completion.

Termination of Programs

In accordance with Section 2-2-503 of the *Accreditation Criteria*, **the campus must cease any new enrollments** in the listed programs on, or before, the due date for submission of the Program Termination applications, with immediate public notice to all interested parties, including, but not limited to, students, governmental agencies, the local community, and ACICS. The campus must submit a Program Termination application through its Member Center account for each affected program within ten (10) days of receipt of this notification. As part of the supporting documentation for the application, the campus must provide the following:

1. Evidence that all interested parties have been notified appropriately. Documentation must include copies of web posting, e-mail blasts, formal communication, catalog revisions, and updates to all advertising materials.
2. An audit of all students currently enrolled in the programs with an indication of expected date of completion/matriculation.
3. A plan to teach-out students in those programs that does not negatively impact their progress to complete the programs in the normal time frame. This plan must include documentation to demonstrate that the campus will continue to offer the educational services to these students, including courses and student and employment support services or provide formal agreements with comparable institutions to facilitate a transfer of these students.

Council-directed withdrawal of approval for a program conditions the campus's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council will be in writing only. Given that the programs have failed to meet standards for three (3) consecutive years, consideration for the appeal will only be given with demonstrable improvements as reported in a mid-CAR (July 1, 2016 – December 31, 2016), with verifiable supporting placement (with waiver) and retention information.

Ms. Erin Easton
December 28, 2016
Page 4

If the campus intends to appeal this withdrawal of program approval action, it must submit all materials by **March 1, 2017**, to car@acics.org. Otherwise, the programs will be considered withdrawn and will be removed from the campus's approved program listing.

Please contact Dr. Terron King at tking@acics.org or (202) 336-6771 if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Mr. Christopher Miller, U.S. Department of Education, School Participation Team,
Region IV (Christopher.miller@ed.gov)
Mr. Scott Corl, North Carolina Community College System
(corls@nccommunitycolleges.edu)
Ms. Sherin Tookss, American Dental Association (tookss@ada.org)



May 3, 2017

ID CODE 00010123(MC)

VIA E-MAIL ONLY

beckfieldacics@beckfield.edu

Mr. Bernard Marth
Regional Vice President of Operations
Beckfield College
16 Spiral Drive
Florence, KY 41042

Subject: Student Achievement Review – Program-Level Show-Cause

Dear Mr. Marth:

The Council has reviewed the final program information as reported on the campus's 2016 Campus Accountability Report (CAR). As a result of its review, the Council found that the following program is significantly below the Council's standard of 60% for retention:

Retention Performance

Program Name	Credential	Student Achievement Outcome
System Administration	Academic Associate's Degree	47%

Council Action

The Council considers student achievement outcomes to be of the utmost importance and therefore directs the campus to show-cause why the approval of this program should not be withdrawn. In response to the show-cause directive, the campus must submit the following information by **June 30, 2017**:

1. A corrective action plan, to include specific remedial actions that are being implemented to improve performance for the aforementioned program. This plan must include documentation of a comprehensive review and evaluation from enrollment through program completion to identify areas of weakness contributing to low retention rates, with corresponding actions implemented by the institution to definitively strengthen its administrative oversight and academic practices to benefit its students.

Mr. Bernard Marth

May 3, 2017

Page 2 of 2

2. A three-quarter 2017 CAR with data for only the aforementioned program. The **program-level spreadsheet** must include all student information between **July 1, 2016, and March 31, 2017**, along with documentation to support the three-quarter retention rate to include documentation of all retention exemptions at the program level and enrollment agreements for new starts.
3. An audit of all students currently enrolled in the program with an indication of expected date of completion/graduation, along with a plan to teach out students in that program that does not negatively impact their progress to complete the program in the normal time frame. This plan must include documentation to demonstrate that the campus will continue to offer the educational services to these students, including courses and student and employment support services or provide formal agreements with comparable institutions to facilitate a transfer of these students.
4. Evidence that all current and prospective students have been advised of the program-level show-cause directive. The following statement must be placed prominently on the campus's website and disclosed on appropriate admissions forms and reference materials:
 - o Notice to students and prospective students: The [NAME OF PROGRAM] at [NAME OF CAMPUS] has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), due to material noncompliance with its retention rate standard of 60%.

The information or reports listed above must be received in the ACICS office electronically via the online Show-Cause application on the campus's account in Member Center. Further, the Council will review the campus's response and take such action as it deems appropriate to its findings relative to convincing evidence of effective remedial actions by the campus to realize improvement in its retention rate.

Please contact Dr. Terron King at tking@acics.org or (202) 336-6771 if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

c: Ms. Sarah Levy, Kentucky Council on Postsecondary Education (sarah.levy@ky.gov)



March 9, 2017

ID Code 00010388(MC)

VIA E-MAIL AND REGULAR MAIL

acicsramsey@eastwick.edu

Mr. Thomas M. Eastwick
President
Eastwick College
10 South Franklin Turnpike
Ramsey, NJ 07446

Subject: Program-Level Licensure Exam Pass Rate Show-Cause Directive

Dear Mr. Eastwick:

The Council has reviewed the program-level licensure pass rate data self-reported on the 2016 Campus Accountability Report (CAR) and found that the following program is materially out of compliance with the Council's minimum standard of 60%:

Program Name	Credential	2016 Licensure Pass Rate
Nursing (L.P.N To R.N Bridge)	Academic Associate's Degree	30%

Council Action

The Council considers student achievement outcomes to be of the utmost importance. Therefore, the Council acted to direct the campus to **show-cause** why the approval of this program should not be permanently withdrawn. In response to the show-cause directive, the campus must submit the following information by **March 27, 2017**:

1. A corrective action plan, to include specific remedial actions that are being implemented to improve licensure exam performance for the aforementioned program. This plan must include documentation of a comprehensive review and evaluation from enrollment through program completion to identify areas of weakness contributing to low pass rates, with corresponding actions implemented by the institution to definitively strengthen its administrative oversight and academic practices to benefit its students.
2. A copy of the most current program licensure pass rate(s) information, since the submission of the 2016 CAR, as published by an oversight licensing agency, a reliable

Mr. Thomas M. Eastwick

March 9, 2017

Page 2

third-party source, or a self-generated report identifying the licensure status of every completer or graduate between July 1, 2016, to December 31, 2016. In the case of a third-party source or a self-generated report, the campus must provide supporting documentation to validate the completion/graduation status of each student as well as the licensure examination testing results.

3. Copies of any correspondence from the oversight licensing agency regarding the campus's performance. The campus must also submit copies of all correspondence/reports that it is required to submit in response to any such requests.
4. Evidence that all current and prospective students have been advised of the program-level show-cause directive. The following statement must be placed prominently on the campus's website and disclosed on appropriate admissions forms and reference materials:
 - o Notice to students and prospective students: The [NAME OF PROGRAM] at [NAME OF CAMPUS] has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), due to material noncompliance with its licensure pass rate standard of 60%.

The information or reports listed above must be received in the ACICS office electronically via the online Show-Cause application on the campus's account in Member Center. Further, the Council will review the campus's response and take such action as it deems appropriate to its findings relative to the need for convincing evidence of effective remedial actions by the campus to realize improvement in its licensure exam pass rate outcomes.

If you have any questions about this action, please contact Ms. Katie Morrison at kmorrison@acics.org.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education (aslrecordsmanager@ed.gov)
Ms. Betty Coughlin, U.S. Department of Education, School Participation Team, Region I & II (Betty.coughlin@ed.gov)
Mr. Gregg Edwards, New Jersey Higher Education (Gregg.edwards@oshe.nj.gov)



April 10, 2017

ID Code 00016220(BC)

VIA E-MAIL ONLY

AEC.TOAAALTA@GMAIL.COM

Mr. Angel Marrero Calderon
Director
American Educational College
225 Munoz Rivera Street
Toa Alta, PR 00960

Subject: Student Achievement Review – Campus-Level Compliance Warning

Dear Mr. Marrero Calderon:

The Council has reviewed your most recently submitted 2016 Campus Accountability Report (CAR) and the campus-level retention rate of 56% does not meet the Council's standard of 60%.

Council Action

Therefore, the Council acted to issue your campus a **compliance warning** for the below-standard results for 2016, subject to the Council's review of updated information at its August 2017 meeting. Accordingly, the campus is required to complete and submit the following information:

1. An **Improvement Plan** that includes specific activities that have been implemented to clearly improve the programs that are negatively impacting campus-level retention performance. The campus must also submit a progress report, corresponding documentation, and any necessary explanatory narrative of all policies and practices implemented and completed for the purpose of retention remediation.
2. A cumulative three-quarter CAR, to include all student information for the period **July 1, 2016, to March 31, 2017**, along with evidence that supports the reported retention rate, to include documentation of all retention exemptions

The information or reports listed above must be received at the Council office electronically, at reporting@acics.org by **June 1, 2017**. If you have any questions about this action, please contact Dr. Terron King at tking@acics.org or (202) 336-6771.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

c: Mr. David Baez Davila, Puerto Rico Council on Education (dbaez@ce.pr.gov)



April 27, 2017

ID CODE 00018779(BC)

VIA E-MAIL ONLY

regulatory.jackson@vc.edu

Mr. Milton Anderson
President
Virginia College
5841 Ridgewood Road
Jackson, MS 39211 USA

Subject: Student Achievement Review – Program-Level Compliance Warning

Dear Mr. Anderson:

The Council has reviewed the final program information as reported on the campus's 2016 Campus Accountability Report (CAR). As a result of its review, the Council found that the following program does not meet the Council's standard of 60% for placement:

Placement Performance

Program Name	Credential	Student Achievement Outcome
Medical Assistant	Certificate/Diploma	59%

Council Action

The Council considers student achievement outcomes to be of the utmost importance. Therefore, the Council acted to issue a **student achievement compliance warning** for the program above. With the expectation of a subsequent review of updated CAR information at some future date, the campus is required to complete the following:

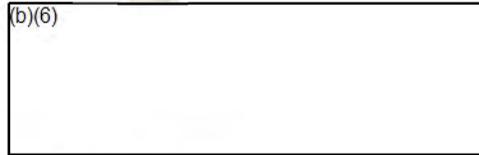
- Incorporation of an Improvement Plan that includes specific activities being considered and in progress for implementation to positively impact program-level placement performance. This Improvement Plan must be incorporated into the Campus Effectiveness Plan (CEP) and will be subject to future review in the normal course of an on-site team evaluation or through other Council action.

Mr. Milton Anderson
April 27, 2017
Page 2 of 2

Please contact Dr. Terron King at tking@acics.org or (202) 336-6771 if you have any questions.

Sincerely,

(b)(6)

A rectangular box with a black border, containing the text "(b)(6)" in the top-left corner. The rest of the box is empty, indicating that the signature has been redacted.

Roger J. Williams
Interim President

- c. Ms. Kim Verneuille, Mississippi Commission of Proprietary Schools and College
Registration (kverneuille@mccb.edu)

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-117

2017 CAR				
Campus	Council Action	Retention	Placement	Licensure
	Withdrawal by Suspension	2	5	
	Show-Cause	6	76	
	Compliance Warning	20	55	
	Reporting	119	73	
		Retention	Placement	Licensure
Program	Withdrawal of Approval	16	41	
	Show-Cause	21	177	
	Compliance Warning	36	171	
	Reporting	122	218	12

PR schools not included



April 26, 2018

ID CODE 00024852(MC)

SENT VIA E-MAIL AND UPS DELIVERY

24852director@pelotoncollege.edu

Ms. E. Jean Jones
Peloton College
8150 North Central Expressway
#M2240
Dallas, TX 75206

Subject: Student Achievement Review – Withdrawal by Suspension

PELTON COLLEGE, DALLAS, TEXAS
PELTON COLLEGE, ARLINGTON, TEXAS

ID CODE: 00024852(MC)
ID CODE: 00275317(BC)

Dear Ms. Jones:

The Council has reviewed the campus's most recently submitted 2017 Campus Accountability Reports (CAR); and having reported a 28% placement rate, the institution is significantly out of compliance with Council standards for placement outcomes. Further, the Council considered the campus's placement performance on the 2016 CAR, at which time 53% was reported.

Council Action

The Council considers student achievement outcomes to be of the utmost importance; and due to the significant nature of non-compliance, and the previous opportunity provided to the institution to demonstrate improvement and bring itself into compliance, the Council acted to withdraw your institution's grant of accreditation by way of suspension.

Please notify the Council office in writing within ten (10) business days from the date of this notice, **May 10, 2018**, if you desire to appeal this decision to the Review Board. The appeal notification **must include** payment of \$10,000 in the form of a cashier's check. If the appeal notice and appropriate fee are not provided within ten business days of receipt of this notice, **then the Council's decision is final.**

If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then the institution would remain accredited through the length of the appeal, and more detailed appeal procedures and information will be forwarded to the institution.

If the institution elects not to appeal this action, any comments you may wish to make about this decision must also be submitted to the Council office no later than **May 10, 2018**. Should you

Ms. E. Jean Jones

April 26, 2018

Page 2 of 2

choose to submit any comments, these comments will be included in the summary detailing the reasons for the Council's decision that will be made available directly to the U.S. Secretary of Education and the appropriate State licensing or authorizing agency, and to the public through www.acics.org.

Institutional Teach-Out Plan

Finally, in accordance with Section 2-2-303 of the *Accreditation Criteria*, the institution is directed to submit the online *Request for Institutional Teach Out* Application no later than **May 10, 2018**. The Council expects that the institution will take the appropriate steps to assist its students through any transition to successfully complete their programs in an orderly manner.

You are advised that Section 2-3-900 of the *ACICS Accreditation Criteria* stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculated at that time of closure.

Please contact Ms. LaToya Boyd at lboyd@acics.org if you have any questions.

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
Texas Workforce Commission (Career.schools@twc.state.tx.us)



March 12, 2018 **REVISED March 12, 2018**

ID CODE 00010544(MC)

VIA E-MAIL AND UPS DELIVERY

cherylfellsschoolofbusiness@yahoo.com

Dr. Cheryl Anne Fell
Director
Cheryl Fell's School of Business
2541 Military Road
Niagara Falls, NY 14304

Subject: Student Achievement - Withdrawal of Institutional Accreditation by Suspension

Dear Dr. Fell:

At its February 2018 meeting, the Council reviewed the institution's updated/revised 2017 Campus Accountability Report (CAR) and found the following based on the *Accreditation Criteria*:

- The institution remains significantly out of compliance with Council standards for placement rates and has little or no chance of coming into compliance. After being found out of compliance following its 2016 submission of 53%, and placed on compliance warning to provide the institution the opportunity to come into compliance within one year, the institution's performance continued to deteriorate in 2017, reporting a rate of 17% (Section 2-1-809 & Appendix L).

Council Action

The Council regards student achievement outcomes with the utmost importance; and due to the significant nature by which the campus remains out of compliance with that standard, the Council acted to **withdraw the institution's accreditation by suspension**.

The institution has the right to appeal this decision to the Review Board of Appeals. The Council must be notified, in writing, **within ten (10) business days of receipt** of this notice if the institution desires to appeal this decision to the Review Board. The appeal notification must include payment in the amount of \$10,000. If the appeal notice and appropriate fee are not provided within the prescribed time, then the Council's decision is final. If the institution elects to appeal this action to the Review Board and remits the appropriate fee by the established deadline, then the campus will maintain its approval within the accredited status of the institution through the length of the appeal, and more detailed appeal procedures and information will be forwarded to the institution.

Dr. Cheryl Anne Fell

March 12, 2018

Page 2 of 2

If the institution elects not to appeal this action, any comments you may wish to make with regard to this decision must be submitted to the Council office within two weeks of the date of this letter. Should you choose to submit any comments, these comments will be included in the summary detailing the reasons for the Council's decision that will be made available to the U.S. Secretary of Education, the appropriate State licensing or authorizing agency, and the public through www.acics.org.

Institutional Teach-Out Plan

Finally, if the institution exercises its appeal rights, in compliance with Section 2-2-303 of the *Accreditation Criteria*, the institution is directed to provide the Council with an Institutional Teach-Out Plan, utilizing the **online Institutional Teach-Out Plan** application in the ACICS Member Center by **March 26, 2018**.

The Council expects that the institution will take the appropriate steps to assist the students at that campus through any transition to successfully complete their programs in an orderly manner. You are advised that Section 2-3-900 of the ACICS *Accreditation Criteria* stipulates that the Council may bar any person or entity from being an owner or senior manager of an ACICS-accredited institution if that person or entity was an owner or manager of an institution that loses its accreditation as a result of a denial or suspension action or that closes without providing a teach-out or refunds to students matriculating at that time of closure.

Please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org if you have any questions.

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Ms. Betty Coughlin, U.S. Department of Education, Boston/New York School
Participation Team, Regions I & II (betty.coughlin@ed.gov)
Dr. Richard Rose, New York State Education Department (richard.rose@nysed.gov)



August 25, 2017

ID CODE 00010544(MC)

VIA E-MAIL AND USPS DELIVERY

cherylfellsschoolofbusiness@yahoo.com

Dr. Cheryl Anne Fell
Director
Cheryl Fell's School of Business
2541 Military Road
Niagara Falls, NY 14304

Subject: Show-Cause Directive

Dear Dr. Fell:

At its August 2017 meeting, the Council considered the institution's response to its student achievement compliance warning letter dated April 10, 2017. After a review of the information submitted, the Council found that the institution failed to submit the requested three-quarter 2017 Campus Accountability Report (CAR) to demonstrate corrective action and improvement (Section 2-3-220).

Council Action

Therefore, the Council acted to **direct the institution to show cause** why its accreditation should not be withdrawn by suspension, subject to a subsequent review of the institution's comprehensive response at the Council's December 2017 meeting. In response to this directive, the institution must complete and submit the following information:

- A copy of the Final Report of the 2017 CAR upon its formal submission to the ACICS CAR portal on November 1, 2017. In addition, the institution must provide documentation to support all students classified as unavailable for placement on the 2017 CAR.

The report and supporting materials listed above must be received in the Council office electronically via the online Show-Cause application in the institution's account by **November 3, 2017**. Failure to do so will be considered a deviation from the directive of ACICS and result in a withdrawal by suspension action in accordance with Section 2-3-402 of the *Accreditation Criteria*.

The institution's heightened focus and efforts toward continuous improvement are a very important component of its accredited status, and essential for a favorable outcome for both the

Dr. Cheryl Anne Fell

August 25, 2017

Page 2 of 2

institution and its students. If you have any questions about this action, please contact Dr. Terron King at (202) 336-6771 or tking@acics.org.

Sincerely,

(b)(6)

Michelle Edwards

President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Ms. Betty Coughlin, U.S. Department of Education, Boston/New York School
Participation Team, Regions I & II (betty.coughlin@ed.gov)
Dr. Richard Rose, New York State Education Department (richard.rose@nysed.gov)



April 10, 2017

ID Code 00010544(MC)

VIA E-MAIL ONLY

cherylfellsschoolofbusiness@yahoo.com

Dr. Cheryl Anne Fell
Director
Cheryl Fell's School of Business
2541 Military Road
Niagara Falls, NY 14304

Subject: Student Achievement Review – Campus-Level Compliance Warning

Dear Dr. Fell:

The Council has reviewed your most recently submitted 2016 Campus Accountability Report (CAR) and the campus-level placement rate of 53% does not meet the Council's standard of 60%.

Council Action

Therefore, the Council acted to issue your campus a **compliance warning** for the below-standard results for 2016, subject to the Council's review of updated information at its August 2017 meeting. Accordingly, the campus is required to complete and submit the following information:

1. An Improvement Plan that includes specific activities that have been implemented to clearly improve the programs that are negatively impacting campus-level placement performance. The campus must also submit a progress report, corresponding documentation, and any necessary explanatory narrative of all policies and practices implemented and completed for the purpose of placement remediation.
2. A cumulative three-quarter CAR, to include all student information for the period **July 1, 2016, to March 31, 2017**, along with evidence that supports the reported placement rates as reported and validated on the Placement Verification Program (PVP).

The information or reports listed above must be received at the Council office electronically, at reporting@acics.org by **June 1, 2017**. If you have any questions about this action, please contact Dr. Terron King at tking@acics.org or (202) 336-6771.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c. Mr. Richard Rose, Bureau of Proprietary School Supervision (Richard.Rose@nysed.gov)



April 24, 2018

ID Code 00011220 (MC)

VIA E-MAIL AND REGULAR MAIL

acics@msc.edu

Ms. Judith Sutton
Director
Mountain State College
Spring At 16th Street
Parkersburg, WV 26101-3993

Subject: Renewal of Accreditation and Campus-Level Student Achievement Show-Cause – Placement

Dear Ms. Sutton:

At its April 2018 meeting, the Council reviewed your institution's application for renewal of accreditation, the evaluation team's visit report, and the institution's response to the two findings identified in that report. The Council also reviewed your recently resubmitted 2017 Campus Accountability Report (CAR), which reported a campus-level placement rate of 58%.

Council Action

While the institution satisfactorily addressed the two findings related to its renewal of accreditation review, it is materially out of compliance with student achievement placement standards for two consecutive years, having reported 58% and 56% in 2017 and 2016, respectively.

Therefore, the Council acted to direct the institution to **show cause** why its current grant of accreditation should not be withdrawn by suspension or otherwise conditioned. In the interim, the institution is required to complete and submit the following information, via its Renewal of Accreditation application (deferral response) for the Council's monitoring and review:

1. Quarterly submission of the following reports and plans, with the first submission due no later than May 1, 2018, and the subsequent submission on August 1, 2018.
 - A corrective action plan that has been incorporated into the current Campus Effectiveness Plan (CEP) and includes specific activities that are being implemented to improve the programs that are negatively impacting the campus-level placement performance for the institution. The institution must also submit a progress report, corresponding documentation, and any necessary explanatory narrative of all activities implemented and completed for the purpose of placement remediation.
 - Quarterly 2018 Campus Accountability Reports (CAR). The institution is reminded that **ONLY** placements that have been submitted to the PVP, verified by the graduate and/or employer, **and** validated by ACICS may be reported on the Report.

Ms. Judith Sutton

April 24, 2018

Page 2 of 2

- Institutional Teach-Out Plan with quarterly updates on the student progression of current enrollments.
2. Evidence that all current and prospective students have been advised of the show-cause status. The following statement must be placed prominently on the institution's website, no later than **five business days** following electronic transmission of this notice:
- Notice to students and prospective students: INSTITUTION NAME, LOCATION has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), because of consecutive noncompliance with placement standards, having reported a ___% and ___% on the 2017 and 2016 Campus Accountability Report respectively.

Failure to provide all information requested by the Council constitutes a deviation from their directive and may result in the suspension or revocation of your institution's grant of accreditation.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within the established time frames without good cause. Given that the institution's longest program is offered at the academic associate's degree level, you are advised that compliance must be achieved within 24 months. Because the campus-level compliance warning for below-standard placement outcomes was issued in April 2017, the institution must come into compliance within the next 12 months. Please consult the Introduction of Title II, Chapter 3 of the *Accreditation Criteria* for additional information.

Please contact Ms. LaToya Boyd at lboyd@acics.org or (202) 336-6777 if you have any questions.

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
Dr. Corley Dennison, West Virginia Higher Education Policy Commission
(Corley.dennison@wvhepc.edu)



August 31, 2017

ID Code 00011220(MC)

VIA E-MAIL ONLY

acics@msc.edu

Ms. Judith Sutton
Director
Mountain State College
Spring at 16th Street
Parkersburg, WV 26101

Subject: Continue Campus-Level Student Achievement Compliance Warning

Dear Ms. Sutton:

At its August 2017 meeting, the Council considered the institution's response to its non-compliance with the retention and placement student achievement standards outlined in the Council's student achievement compliance warning letter dated April 10, 2017.

Following its review of the requested information related to these areas of non-compliance, the Council acted to **continue the compliance warning, pending review of the 2017 Campus Accountability Report (CAR)**. The institution's official 2017 CAR submission will be reviewed by the Council during the December 2017 meeting, and the Council will take action in accordance with the procedures outlined in Appendix L of the *Accreditation Criteria*. The institution's submission must include documentation sent to reporting@acics.org by **November 3, 2017**, to support all students classified as retention waivers and not available for placement. The Council reminds the institution that all placements reported on the 2017 CAR must have been verified by the ACICS Placement Verification Program.

The institution's heightened focus and efforts responsive to the Council's concern for its student achievement results are essential for a favorable outcome for both the institution and its students. If you have any questions about this action, please contact Dr. Terron King at (202) 336-6771 or tking@acics.org.

Sincerely,

(b)(6)

Michelle Edwards
President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
Ms. Nancy Gifford, U.S. Department of Education, Philadelphia School Participation Team,
Region III (nancy.paula.gifford@ed.gov)
Dr. Corley Dennison, West Virginia Higher Education Department
(corley.dennison@wvhepc.edu)



May 11, 2018

ID CODE: 00011238 (MC)

VIA E-MAIL ONLY

acics21@national-college.edu

Mr. Mike McKinley
Onsite Administrator
American National University
2376 Sir Barton Way
Lexington, KY 40509

Subject: Program-Level Withdrawal of Approval

RE: American National University- Pikeville, KY

ID CODE: 00010725 (BC)

Dear Mr. McKinley:

The Council has reviewed the 2017 Campus Accountability Report (CAR) for **American National University-Pikeville, KY**. As a result of its review, the Council found that the following based on the *Accreditation Criteria*:

- The following program is materially out of compliance with ACICS standards for student achievement and has been underperforming for the last three years, as summarized below. It has been determined that the program has little or no chance of coming into compliance within the maximum time frames (Section 2-1-809 & Appendix L).

Placement Performance

Program Name	Credential Level	2017 Placement	2016 Placement	2015 Placement
Phlebotomy and E.C.G. Technician	Certificate/Diploma	26%	40%	50%

Council Action

The Council considers student achievement outcomes to be of the utmost importance. Due to the significant nature in which the program is out of compliance with that standard, and the previous opportunity provided to the campus to demonstrate improvement in the program, the Council acted to withdraw approval for the program. **However, this withdrawal of program approval does not apply to currently enrolled students through their completion.**

Termination of Program

In accordance with Section 2-2-503 of the *Accreditation Criteria*, **the campus must cease any new enrollments** in the listed program on or before the due date for submission of the Program Termination application, with immediate public notice to all interested parties, including, but not limited to, students, governmental agencies, the local community, and ACICS. The campus must submit a Program Termination application through its Member Center account for each affected program **within ten (10) business days of receipt of this notification**. As part of the supporting documentation for the application, the campus must provide the following:

Mr. Mike McKinley

May 11, 2018

Page 2 of 2

1. Evidence that all interested parties have been notified appropriately. Documentation must include copies of web posting, e-mail blasts, formal communication, catalog revisions, and updates to all advertising materials.
2. An audit of all students currently enrolled in the program with an indication of expected date of completion/graduation.
3. A plan to teach-out students in that program that does not negatively impact their progress to complete the program in the normal time frame. This plan must include documentation to demonstrate that the campus will continue to offer the educational services to these students, including courses and student and employment support services or provide formal agreements with comparable institutions to facilitate a transfer of these students.

Upon its review of the information provided in the Program Termination application concerning student matriculating status, the Council may direct the campus to immediately identify for execution transfer agreements with other institutions or campuses within its institution, given the severe underperformance of the program.

Failure to follow the Council's directive may result in the suspension or revocation of your institution's grant of accreditation.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only. If the campus intends to appeal this withdrawal of program approval action, it must submit any supporting materials by **June 30, 2018**, to car@acics.org.

Please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org or (202) 336-6769 if you have any questions.

Sincerely,



(b)(6)

Michelle Edwards
President and CEO

- c. Ms. Tammy Riley, Pikeville branch campus (acics22@national-college.edu)
Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)
Ms. Sarah Levy, Kentucky Council on Postsecondary Education
(Sarah.Levy@ky.gov)



May 1, 2018

ID Code: 00019411(MC)

VIA E-MAIL ONLY

acicsfallschurch@stratford.edu

Dr. Valarie J Trimarchi
Campus President
Stratford University
7777 Leesburg Pike, Suite 100-S
Falls Church, VA 22043

Subject: Student Achievement Review – Campus-Level Compliance Warning

Stratford University – Falls Church, VA
Stratford University - Alexandria Campus - Alexandria, VA

ACICS ID: 00019411(MC)

ACICS ID: 00239628(BC)

Dear Dr. Trimarchi:

The Council has reviewed your most recently submitted 2017 Campus Accountability Reports (CAR) for the **Falls Church, VA**, and **Alexandria, VA**, campuses, and the campus-level placement rates of **50%** and **51%**, respectively, do not meet the Council's standard of 60%.

Council Action

Therefore, the Council acted to place the institution on **compliance warning** for the below-standard results for 2017, subject to the Council's review of the **Falls Church and Alexandria** campuses' 2018 Campus Accountability Reports. In the interim, the campuses are required to complete the following:

1. An Improvement Plan that has been incorporated into the current Campus Effectiveness Plan (CEP) and includes specific activities that are being implemented to improve the programs that are negatively impacting the campus-level placement performance for each campus. This plan is subject to review by an on-site evaluation team or upon request by the Council.
2. Quarterly 2018 Campus Accountability Reports (CAR), to be submitted via the ACICS CAR system. The institution is reminded that **ONLY** placements that have been submitted to the PVP, verified by the graduate and/or employer, and validated by ACICS may be reported on the Report.

Failure to follow the Council's directive may result in the suspension or revocation of your institution's grant of accreditation.

Dr. Valarie J. Trimarchi

May 1, 2018

Page 2 of 2

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within the established time frames without good cause. Given that the longest program at each campus is offered at the **master's degree** level, you are advised that compliance must be achieved within 24 months. Please consult the Introduction of Title II, Chapter 3 of the *Accreditation Criteria* for additional information.

If you have any questions about this action, please contact Ms. LaToya Boyd at (202) 336-6777 or lboyd@acics.org.

Sincerely,

(b)(6)

Michelle Edwards
President

- c: Ms. Alycia Johnson, Alexandria branch campus (acicsalexandria@stratford.edu)
- Ms. Cathy Sbeffield, Accreditation and State Liaison, U.S. Department of Education
- Ms. Sylvia Rosa-Casanova, State Council of Higher Education for Virginia
(sylviarosacasanova@schev.edu)
- Ms. Florence Tate, Accrediting Bureau of Health Education Schools (info@abhes.org)



May 10, 2018

ID CODE: 00027446 (MC)

VIA E-MAIL ONLY

WJ-acics@broadviewuniversity.edu

Mr. Marc Glutz
Campus Director
Broadview University-West Jordan
1902 West 7800 South
West Jordan, UT 84088

Subject: Student Achievement Review - Program-Level Compliance Warning

Dear Mr. Glutz:

The Council has reviewed the final program information as reported on the institution's 2017 Campus Accountability Report (CAR). As a result of its review, the Council found that the following program does not meet the Council's standard of 60% for placement:

Placement Performance

Program Name	Credential Level	2017 Placement
Business Administration	Academic Associate's Degree	56%

Council Action

The Council considers student achievement outcomes to be of the utmost importance. Therefore, the Council acted to place the program above on **student achievement compliance warning** for the below-standard results for 2017, subject to the Council's review of the campus's 2018 Campus Accountability Report. In the interim, the campus is required to complete the following:

1. An Improvement Plan that has been incorporated into the current Campus Effectiveness Plan (CEP) and includes specific activities that are being implemented to improve program-level placement performance. This plan is subject to review by an on-site evaluation team or upon request by the Council.
2. Quarterly 2018 Campus Accountability Reports (CAR), to be submitted via the ACICS CAR system. Documentation to support any placement waivers may be requested by the Council, at its discretion.

Failure to follow the Council's directive may result in the suspension or revocation of your institution's grant of accreditation.

The Council is obligated to take adverse action against any program that fails to come into compliance with the *Accreditation Criteria* within the established time frames without good cause. Given this program is offered at the **Academic Associate's Degree** level, you are advised that compliance must be achieved within **24** months. Please consult the Introduction of Title II, Chapter 3 of the *Accreditation Criteria* for additional information.

If you have any questions about this action, please contact Ms. LaToya Boyd at (202) 336-6777 or lboyd@acics.org.

750 First Street, NE, Suite 980 Washington, DC 20002-4223 t - 202.336.6780 f - 202.842.2593 www.acics.org

ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

Mr. Marc Glutz
May 10, 2018
Page 2 of 2

Sincerely,

(b)(6)

Michelle Edwards
President and CEO

- c. Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov) (CaseTeams@ed.gov)
- Ms. Marla Winegar, Utah Dept. of Commerce (mwinegar@utah.gov)

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-118

CAR Campus Trends Report

As of: 7/24/2017

Institution(s): All Trend Years: 3 Category: Retention Lower Limit: 0% Upper Limit: 100%

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend	
		Year	Beginning Population	Total Enrollment			Ending Population
00010400	Academy College	2016	88	166	94	 75% 70% 74% 2014 2015 2016	 77% 77% 74% 2014 2015 2016
00136114	Ambria College of Nursing	2016	416	693	387	 83% 76% 2015 2016	 88% 84% 2015 2016
00171540	American College For Medical Careers	2016	406	883	359	 73% 73% 71% 2014 2015 2016	 65% 65% 75% 2014 2015 2016
00050228	American College of Commerce and Technology	2016	594	1933	1334	 79% 2016	 80% 2016
00274252	American College of Commerce and Technology - Alhambra	2016	2	34	29	 88% 2016	 0% 2016
00010493	American Educational College	2016	199	448	160	 63% 60% 66% 2014 2015 2016	 92% 79% 62% 2014 2015 2016
00016220	American Educational College	2016	186	451	145	 66% 67% 58% 2014 2015 2016	 98% 91% 69% 2014 2015 2016
00020978	American Educational College	2016	214	503	182	 65% 61% 59% 2014 2015 2016	 93% 89% 75% 2014 2015 2016
00010428	American Institute	2016	272	649	289	 75% 70% 66% 2014 2015 2016	 75% 72% 67% 2014 2015 2016
00022769	American Institute	2016	469	1120	504	 75% 74% 77% 2014 2015 2016	 72% 72% 70% 2014 2015 2016
00207625	American Institute	2016	240	583	261	 76% 75% 69% 2014 2015 2016	 70% 75% 67% 2014 2015 2016
00262931	American Institute of Medical Sciences and Education	2016	201	424	240	 93% 2016	 73% 2016
00032315	American International College of Arts and Sciences-Antigua	2016	55	97	48	 74% 85% 81% 2014 2015 2016	 0% 0% 0% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00010147	American National University	2016	71	186	81	 62% 70% 65% 2014 2015 2016 71% 72% 75% 2014 2015 2016
00010154	American National University	2016	52	98	45	 59% 70% 75% 2014 2015 2016 67% 78% 73% 2014 2015 2016
00010250	American National University	2016	150	316	140	 54% 65% 65% 2014 2015 2016 72% 70% 62% 2014 2015 2016
00010278	American National University	2016	269	747	341	 55% 60% 61% 2014 2015 2016 77% 73% 75% 2014 2015 2016
00010422	American National University	2016	84	180	59	 64% 56% 2014 2015 2016 73% 64% 2014 2015 2016
00010456	American National University	2016	60	127	50	 64% 65% 71% 2014 2015 2016 71% 69% 89% 2014 2015 2016
00010725	American National University	2016	131	299	148	 72% 68% 71% 2014 2015 2016 71% 87% 72% 2014 2015 2016
00010947	American National University	2016	97	267	125	 54% 54% 68% 2014 2015 2016 71% 76% 74% 2014 2015 2016
00011121	American National University	2016	81	183	98	 69% 68% 71% 2014 2015 2016 68% 71% 74% 2014 2015 2016
00011138	American National University	2016	87	206	73	 62% 60% 62% 2014 2015 2016 84% 75% 78% 2014 2015 2016
00011176	American National University	2016	113	267	117	 61% 56% 60% 2014 2015 2016 82% 79% 86% 2014 2015 2016
00011184	American National University	2016	81	197	105	 66% 59% 74% 2014 2015 2016 69% 71% 73% 2014 2015 2016
00011238	American National University	2016	104	224	90	 61% 67% 64% 2014 2015 2016 77% 83% 72% 2014 2015 2016
00021196	American National University	2016	105	202	90	 60% 64% 70% 2014 2015 2016 81% 83% 71% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00021505	American National University	2016	89	175	81	
00021741	American National University	2016	90	212	85	
00023466	American National University	2017	82	152	79	
00023524	American National University	2016	58	129	54	
00024636	American National University	2016	57	103	44	
00028878	American National University	2016	30	64	16	
00037761	American National University	2016	37	154	76	
00039874	American National University	2015	44	99	22	
00049448	American National University	2016	48	129	65	
00108494	American National University	2016	43	89	37	
00010867	American School of Business	2015	34	86	42	
00109005	American University In Bosnia and Herzegovina	2016	356	518	404	
00020207	American University of Health Sciences	2016	282	361	237	
00016231	Art Institute of Fort Lauderdale	2016	1056	1857	920	

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00032160	Art Institute of Indianapolis	2016	534	1155	535		
00032209	Art Institute of Las Vegas	2016	663	1304	666		
00016235	Art Institute of New York City	2016	608	655	188		
00016228	Art Institute of Phoenix	2016	794	1547	782		
00032150	Art Institute of Salt Lake City	2016	253	288	105		
00024231	Art Institutes International - Kansas City, The	2016	226	250	115		
00010811	Atlantic University College	2016	1521	2196	1586		
00073857	Bay Area College of Nursing	2015	33	89	49		
00060173	Bay Area Medical Academy	2015	41	152	63		
00011208	Beal College	2016	352	620	283		
00010123	Beckfield College	2016	640	1224	595		
00024280	Beckfield College	2016	442	733	315		
00023888	Bergin University of Canine Studies	2016	33	63	38		
00114473	Berks Technical Institute	2016	795	1502	746		

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00028717	Best Care College	2016	72	139	82	 73% 75% 73% 2014 2015 2016 84% 87% 95% 2014 2015 2016
00232604	Bethesda College of Health Sciences	2016	32	60	27	 77% 2016 63% 2016
00031961	Beverly Hills Design Institute	2016	32	43	25	 65% 63% 77% 2014 2015 2016 0% 100% 100% 2014 2015 2016
00223527	BIR Training Center	2016	447	904	527	 83% 2016 70% 2016
00021958	Bolivar Technical College	2016	50	159	79	 66% 73% 66% 2014 2015 2016 100% 90% 84% 2014 2015 2016
00024539	Bon Secours Memorial College of Nursing	2016	429	647	449	 95% 93% 94% 2014 2015 2016 99% 99% 96% 2014 2015 2016
00010509	Bradford School	2016	207	494	172	 89% 88% 87% 2014 2015 2016 84% 77% 85% 2014 2015 2016
00010550	Bradford School	2016	309	662	271	 84% 82% 83% 2014 2015 2016 89% 88% 88% 2014 2015 2016
00010452	Branford Hall Career Institute	2017	214	453	232	 75% 72% 71% 2015 2016 2017 50% 56% 58% 2015 2016 2017
00012823	Branford Hall Career Institute	2016	182	402	108	 77% 74% 66% 2014 2015 2016 61% 53% 60% 2014 2015 2016
00015722	Branford Hall Career Institute	2016	334	632	207	 80% 81% 75% 2014 2015 2016 75% 69% 72% 2014 2015 2016
00018785	Branford Hall Career Institute	2016	446	910	280	 71% 77% 65% 2014 2015 2016 80% 77% 72% 2014 2015 2016
00019180	Branford Hall Career Institute	2016	394	730	251	 83% 84% 83% 2014 2015 2016 64% 71% 65% 2014 2015 2016
00022387	Branford Hall Career Institute	2016	144	360	101	 74% 73% 67% 2014 2015 2016 74% 65% 75% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00178224	Branford Hall Career Institute	2016	223	516	187	 2014 2016	 2014 2016
00255818	Branford Hall Career Institute	2016	21	30	8	 2016	 2016
00010863	Brightwood Career Institute	2017	322	629	339	 2015 2016 2017	 2015 2016 2017
00011179	Brightwood Career Institute	2017	123	240	131	 2015 2016 2017	 2015 2016 2017
00011256	Brightwood Career Institute	2017	290	442	225	 2015 2016 2017	 2015 2016 2017
00170949	Brightwood Career Institute	2017	234	430	236	 2015 2016 2017	 2015 2016 2017
00171004	Brightwood Career Institute	2017	333	614	358	 2015 2016 2017	 2015 2016 2017
00010164	Brightwood College	2017	221	435	249	 2015 2016 2017	 2015 2016 2017
00010363	Brightwood College	2017	200	375	206	 2015 2016 2017	 2015 2016 2017
00011298	Brightwood College	2017	238	412	191	 2015 2016 2017	 2015 2016 2017
00016302	Brightwood College	2017	113	213	112	 2015 2016 2017	 2015 2016 2017
00021867	Brightwood College	2017	202	306	167	 2015 2016 2017	 2015 2016 2017
00170646	Brightwood College	2017	194	358	183	 2015 2016 2017	 2015 2016 2017
00170918	Brightwood College	2017	107	195	93	 2015 2016 2017	 2015 2016 2017

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00170956	Brightwood College	2017	214	396	239	85% 84% 89% 2015 2016 2017	72% 65% 54% 2015 2016 2017
00170959	Brightwood College	2016	205	555	193	69% 76% 75% 2014 2015 2016	70% 74% 77% 2014 2015 2016
00170962	Brightwood College	2017	213	338	175	87% 89% 87% 2015 2016 2017	80% 80% 67% 2015 2016 2017
00170989	Brightwood College	2017	308	553	296	84% 84% 83% 2015 2016 2017	79% 73% 53% 2015 2016 2017
00170992	Brightwood College	2017	264	418	212	81% 83% 88% 2015 2016 2017	72% 74% 54% 2015 2016 2017
00170998	Brightwood College	2017	360	639	378	83% 83% 87% 2015 2016 2017	73% 71% 56% 2015 2016 2017
00171001	Brightwood College	2016	172	483	176	79% 77% 2015 2016	81% 82% 2015 2016
00171007	Brightwood College	2017	168	286	159	86% 84% 85% 2015 2016 2017	72% 79% 68% 2015 2016 2017
00171010	Brightwood College	2017	289	485	256	82% 82% 83% 2015 2016 2017	71% 70% 52% 2015 2016 2017
00171016	Brightwood College	2017	454	779	423	82% 77% 86% 2015 2016 2017	78% 81% 67% 2015 2016 2017
00171019	Brightwood College	2017	189	343	190	77% 76% 85% 2015 2016 2017	83% 72% 50% 2015 2016 2017
00171025	Brightwood College	2017	280	525	298	84% 77% 85% 2015 2016 2017	80% 73% 73% 2015 2016 2017
00171031	Brightwood College	2017	589	868	485	89% 86% 88% 2015 2016 2017	76% 76% 56% 2015 2016 2017
00171034	Brightwood College	2017	211	385	210	79% 78% 82% 2015 2016 2017	78% 79% 59% 2015 2016 2017

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00171037	Brightwood College	2017	203	345	203		
00171049	Brightwood College	2017	455	705	410		
00171052	Brightwood College	2017	175	322	195		
00173481	Brightwood College	2017	761	1162	745		
00173484	Brightwood College	2017	297	533	290		
00180852	Brightwood College	2017	320	539	278		
00223659	Brightwood College	2017	278	491	305		
00223669	Brightwood College	2017	270	444	248		
00223674	Brightwood College	2017	182	398	247		
00235508	Brightwood College	2017	286	566	285		
00235912	Brightwood College	2017	208	350	204		
00015728	Bristol University	2017	53	78	43		
00038078	Broadview Entertainment Arts University	2016	77	163	85		
00041665	Broadview University - Appleton	2016	124	240	82		

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00042977	Broadview University - Boise	2016	77	150	49	
00024029	Broadview University - Eau Claire	2016	87	184	74	
00028404	Broadview University - Madison East	2016	137	274	129	
00031992	Broadview University - Wausau	2016	72	186	81	
00027418	Broadview University-Layton	2015	90	191	79	
00027449	Broadview University-Orem	2015	73	159	65	
00027446	Broadview University-West Jordan	2017	104	235	134	
00010589	Brookline College	2016	235	705	267	
00010976	Brookline College	2016	917	1860	815	
00012767	Brookline College	2016	282	676	256	
00020269	Brookline College	2016	193	493	252	
00019459	Brooks Institute	2015	396	631	331	
00010565	Brookstone College of Business	2014	78	199	69	
00011990	Brookstone College of Business	2014	113	266	120	

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00011239	Brown Mackie College - Akron	2017	168	211	76	 65% 75% 68% 2015 2016 2017 60% 43% 21% 2015 2016 2017
00020239	Brown Mackie College - Atlanta	2016	600	962	340	 61% 60% 61% 2014 2015 2016 70% 73% 59% 2014 2015 2016
00042826	Brown Mackie College - Birmingham	2014	712	1772	718	 56% 2014 73% 2014
00023969	Brown Mackie College - Boise	2016	274	441	162	 62% 63% 64% 2014 2015 2016 77% 84% 67% 2014 2015 2016
00010572	Brown Mackie College - Cincinnati	2016	560	981	330	 60% 56% 60% 2014 2015 2016 69% 63% 51% 2014 2015 2016
00145522	Brown Mackie College - Dallas/Ft. Worth	2016	379	766	360	 65% 64% 2015 2016 65% 73% 2015 2016
00010165	Brown Mackie College - Findlay	2016	281	575	282	 69% 68% 77% 2014 2015 2016 72% 68% 51% 2014 2015 2016
00010218	Brown Mackie College - Fort Wayne	2016	323	534	197	 62% 63% 65% 2014 2015 2016 64% 65% 58% 2014 2015 2016
00024800	Brown Mackie College - Greenville	2016	544	1031	400	 66% 66% 64% 2014 2015 2016 70% 62% 58% 2014 2015 2016
00020248	Brown Mackie College - Hopkinsville	2016	117	220	87	 64% 77% 2014 2015 2016 77% 62% 2014 2015 2016
00023533	Brown Mackie College - Indianapolis	2016	744	1227	415	 63% 61% 57% 2014 2015 2016 70% 65% 50% 2014 2015 2016
00020244	Brown Mackie College - Louisville	2016	760	1348	553	 53% 60% 67% 2014 2015 2016 71% 70% 61% 2014 2015 2016
00011110	Brown Mackie College - Merrillville	2016	405	673	266	 69% 66% 67% 2014 2015 2016 72% 66% 60% 2014 2015 2016
00021677	Brown Mackie College - Miami	2016	496	699	246	 77% 71% 77% 2014 2015 2016 60% 47% 52% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010849	Brown Mackie College - Michigan City	2015	159	161	46	62% 2014 2015	70% 2014 2015
00020242	Brown Mackie College - North Canton	2016	322	509	160	60% 67% 2014 2015 2016	67% 59% 2014 2015 2016
00024522	Brown Mackie College - Phoenix	2016	477	810	343	64% 67% 70% 2014 2015 2016	75% 67% 62% 2014 2015 2016
00011295	Brown Mackie College - Quad Cities	2016	243	410	163	68% 71% 2014 2015 2016	71% 53% 2014 2015 2016
00041546	Brown Mackie College - San Antonio	2016	581	1145	534	60% 58% 63% 2014 2015 2016	71% 66% 62% 2014 2015 2016
00010695	Brown Mackie College - South Bend	2016	277	493	160	64% 70% 66% 2014 2015 2016	72% 65% 60% 2014 2015 2016
00029631	Brown Mackie College - St. Louis	2016	346	562	209	58% 64% 69% 2014 2015 2016	73% 71% 67% 2014 2015 2016
00011136	Brown Mackie College - Tucson	2016	444	697	263	64% 65% 67% 2014 2015 2016	71% 60% 53% 2014 2015 2016
00024239	Brown Mackie College - Tulsa	2016	441	772	318	61% 66% 63% 2014 2015 2016	77% 70% 61% 2014 2015 2016
00011118	Brown Mackie College- Northern Kentucky	2015	280	449	119	64% 2014 2015	72% 2014 2015
00031313	Brown Mackie College-Albuquerque	2016	600	903	370	72% 72% 71% 2014 2015 2016	72% 68% 62% 2014 2015 2016
00010128	Bryan University	2016	70	163	61	74% 79% 70% 2014 2015 2016	63% 78% 71% 2014 2015 2016
00010722	Bryan University	2016	198	532	226	65% 65% 64% 2014 2015 2016	71% 67% 72% 2014 2015 2016
00011099	Bryan University	2016	134	135	83	64% 66% 77% 2014 2015 2016	71% 66% 69% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00023162	Bryan University	2016	117	206	89	
00045407	Bryan University	2016	62	137	50	
00146787	Bryan University	2016	1174	2649	1470	
00269056	California Aeronautical University	2016	0	9	9	
00225377	California Institute of Advanced Management	2016	7	14	10	
00020292	California International Business University	2016	39	105	81	
00024921	California Miramar University	2016	326	464	237	
00149159	California Miramar University-Kenya	2016	36	53	46	
00021311	California University of Management and Sciences	2016	318	634	392	
00023818	California University of Management and Sciences	2017	642	851	355	
00234751	California University of Management and Sciences San Diego Branch	2016	78	129	51	
00010235	Cambria-Rowe Business College	2015	85	159	73	
00010740	Cambria-Rowe Business College	2015	134	220	86	
00020356	Cambridge Junior College	2016	117	285	102	

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00033447	Cambridge Junior College - Woodland	2016	48	100	44	 87% 86% 85% 2014 2015 2016 75% 71% 85% 2014 2015 2016
00011311	Camelot College	2016	172	329	149	 70% 69% 71% 2014 2015 2016 80% 82% 75% 2014 2015 2016
00010874	Career Point College	2015	1034	2138	1079	 79% 2014 2015 86% 2014 2015
00010875	Career Point College	2014	87	198	70	 73% 2014 71% 2014
00265153	Career Point College	2015	24	207	129	 79% 2015 79% 2015
00262627	Center For Advanced Legal Studies	2016	149	401	159	 83% 2016 72% 2016
00010858	Charter College	2017	501	966	400	 61% 52% 69% 2015 2016 2017 63% 41% 53% 2015 2016 2017
00275965	Charter College	2016	0	9	9	 100% 2016 0% 2016
00032429	Charter College - Bellinghamx	2014	201	539	188	 70% 2014 81% 2014
00040343	Charter College - Canyon Country	2015	207	424	130	 78% 2014 2015 70% 2014 2015
00040346	Charter College - Lancaster Campus	2015	339	661	180	 74% 2014 2015 63% 2014 2015
00024798	Charter College - Oxnard	2017	269	498	196	 64% 67% 72% 2015 2016 2017 73% 50% 60% 2015 2016 2017
00024581	Charter College - Pasco Washington	2017	405	725	274	 72% 71% 74% 2015 2016 2017 69% 57% 59% 2015 2016 2017
00035142	Charter College - Vancouver	2016	227	1166	624	 72% 65% 76% 2014 2015 2016 80% 79% 65% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend	
		Year	Beginning Population	Total Enrollment			Ending Population
00180313	Charter College, Fife, WA	2016	133	295	98	 77% 2014 2016 72%	 54% 2014 2016 72%
00040349	Charter College-Long Beach	2015	237	351	29	 73% 2014 2015 73%	 78% 2014 2015 78%
00275920	Charter Institute A Division of Charter College	2016	0	0	0	 0% 2016 0%	 0% 2016 0%
00275939	Charter Institute A Division of Charter College	2016	0	0	0	 0% 2016 0%	 0% 2016 0%
00275941	Charter Institute A Division of Charter College	2016	0	0	0	 0% 2016 0%	 0% 2016 0%
00010544	Cheryl Fell's School of Business	2016	49	100	35	 83% 2014 2015 2016 63% 64%	 25% 2014 2015 2016 88% 53%
00010786	City College	2016	457	831	452	 72% 2014 2015 2016 66% 75%	 72% 2014 2015 2016 75% 72%
00010951	City College	2016	426	741	376	 75% 2014 2015 2016 65% 69%	 71% 2014 2015 2016 84% 80%
00015624	City College	2016	277	544	273	 77% 2014 2015 2016 78% 67%	 71% 2014 2015 2016 75% 82%
00015801	City College	2016	337	601	301	 70% 2014 2015 2016 63% 66%	 63% 2014 2015 2016 81% 77%
00070469	City College	2016	151	370	218	 73% 2014 2015 2016 72% 73%	 84% 2014 2015 2016 75% 67%
00024768	Clary Sage College	2016	250	642	244	 81% 2014 2015 2016 82% 80%	 84% 2014 2015 2016 80% 77%
00010253	Colegio Tecnológico y Comercial de PR	2016	71	116	47	 54% 2014 2015 2016 70% 73%	 70% 2014 2015 2016 63% 63%
00010418	Coleman University	2016	452	785	389	 70% 2014 2015 2016 72% 70%	 72% 2014 2015 2016 85% 86%

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00019381	College of Business & Technology	2017	0	10	9		
00022321	College of Business & Technology	2016	97	365	120		
00022322	College of Business & Technology	2016	170	480	149		
00024493	College of Business & Technology	2016	58	176	55		
00177353	College of Business & Technology	2016	43	154	70		
00010864	College of Court Reporting	2016	237	399	190		
00037894	Collins College	2015	130	140	31		
00012400	Colorado Heights University	2016	415	938	412		
00068978	Columbia College	2016	553	1041	501		
00024765	Community Care College	2016	450	1116	472		
00022181	Computer Systems Institute	2017	1913	3123	1776		
00023489	Computer Systems Institute	2017	659	1067	534		
00023493	Computer Systems Institute	2017	38	38	0		
00039798	Computer Systems Institute	2017	35	35	0		

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00010680	Consolidated School of Business	2016	99	183	73	 80% 83% 81% 2014 2015 2016 79% 76% 67% 2014 2015 2016
00011153	Consolidated School of Business	2016	76	133	49	 73% 69% 2014 2015 2016 80% 67% 2014 2015 2016
00010106	Cope Institute	2016	0	111	0	 90% 89% 94% 2014 2015 2016 93% 82% 84% 2014 2015 2016
00011308	Court Reporting Institute of Dallas	2014	180	225	119	 62% 2014 50% 2014
00020271	Court Reporting Institute of St. Louis	2017	187	215	82	 58% 43% 2015 2016 2017 42% 10% 2015 2016 2017
00010142	Daymar College	2016	63	144	75	 66% 70% 67% 2014 2015 2016 75% 65% 75% 2014 2015 2016
00010249	Daymar College	2014	101	142	37	 61% 2014 72% 2014
00010251	Daymar College	2016	130	331	169	 61% 67% 84% 2014 2015 2016 66% 85% 80% 2014 2015 2016
00010306	Daymar College	2016	137	245	111	 70% 69% 65% 2014 2015 2016 71% 81% 83% 2014 2015 2016
00011217	Daymar College	2016	557	1426	694	 72% 78% 69% 2014 2015 2016 76% 80% 70% 2014 2015 2016
00011240	Daymar College	2015	60	107	40	 56% 2014 2015 76% 2014 2015
00011252	Daymar College	2015	37	53	20	 65% 2014 2015 74% 2014 2015
00011305	Daymar College	2016	209	582	268	 77% 79% 62% 2014 2015 2016 67% 80% 82% 2014 2015 2016
00019841	Daymar College	2014	201	334	102	 59% 2014 75% 2014

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00020977	Daymar College	2016	138	352	166	 73% 72% 65% 2014 2015 2016 72% 81% 77% 2014 2015 2016
00021957	Daymar College	2016	7	27	14	 59% 78% 85% 2014 2015 2016 73% 46% 0% 2014 2015 2016
00022467	Daymar College	2016	46	114	37	 73% 43% 2014 2015 2016 79% 100% 2014 2015 2016
00023357	Daymar College	2014	90	169	65	 74% 2014 85% 2014
00024812	Daymar College	2014	19	19	5	 67% 2014 20% 2014
00024284	Daymar College (Online)	2015	275	522	156	 52% 2014 2015 70% 2014 2015
00010578	Delta School of Business & Technology	2017	137	198	110	 75% 79% 2015 2016 2017 80% 45% 2015 2016 2017
00011987	Design Institute Of San Diego	2016	157	218	140	 85% 85% 79% 2014 2015 2016 91% 95% 94% 2014 2015 2016
00010628	Detroit Business Institute-Downriver	2016	55	108	49	 90% 87% 93% 2014 2015 2016 86% 91% 83% 2014 2015 2016
00022683	Dewey University- Arroyo Campus	2015	71	190	72	 73% 2014 2015 50% 2014 2015
00015899	Dewey University- Bayamon Campus	2016	154	352	184	 77% 72% 68% 2014 2015 2016 39% 64% 78% 2014 2015 2016
00015637	Dewey University- Carolina Campus	2016	432	861	398	 73% 74% 67% 2014 2015 2016 55% 51% 66% 2014 2015 2016
00022018	Dewey University- Farjardo Campus	2016	140	307	147	 77% 65% 80% 2014 2015 2016 62% 71% 81% 2014 2015 2016
00024257	Dewey University- Hatillo Campus	2015	87	156	54	 60% 2014 2015 25% 2014 2015

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00010091	Dewey University- Hato Rey Campus	2016	798	1419	643	
00021863	Dewey University- Juana Diaz Campus	2016	220	464	246	
00024810	Dewey University- Manati Campus	2016	468	932	454	
00240788	Dewey University Mayaguez	2016	114	252	159	
00021648	Digital Media Arts College	2016	285	436	287	
00265917	Dorsey School of Beauty	2016	166	400	154	
00010763	Dorsey School of Business	2016	232	753	344	
00011102	Dorsey School of Business	2016	122	296	112	
00011210	Dorsey School of Business	2016	543	1311	479	
00011322	Dorsey School of Business	2016	158	440	149	
00234674	Dorsey School of Business	2016	289	793	315	
00148244	Dorsey School of Business - Lansing	2016	136	300	107	
00023765	Dorsey School of Business, Farmington Hills	2016	82	159	30	
00042275	Dorsey School of Business, Saginaw	2016	234	527	161	

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00026874	Dorsey School of Business, Waterford/Pontiac	2016	190	493	169	 2014 2015 2016	 2014 2015 2016
00010612	Douglas Education Center	2016	191	451	191	 2014 2015 2016	 2014 2015 2016
00010655	Drake College of Business	2014	673	1780	692	 2014	 2014
00024332	Drake College of Business	2014	1286	2649	891	 2014	 2014
00011225	DuBois Business College	2015	84	161	83	 2014 2015	 2014 2015
00012819	DuBois Business College	2015	21	39	18	 2014 2015	 2014 2015
00012824	DuBois Business College	2015	75	119	54	 2014 2015	 2014 2015
00010469	Duluth Business University	2016	130	219	88	 2014 2015 2016	 2014 2015 2016
00011200	Eagle Gate College	2016	337	677	289	 2014 2016	 2014 2016
00021444	Eagle Gate College	2016	163	375	146	 2014 2015 2016	 2014 2015 2016
00225143	East West College of Natural Medicine	2016	234	348	234	 2014 2016	 2014 2016
00010388	Eastwick College	2016	869	1412	797	 2014 2015 2016	 2014 2015 2016
00011227	Eastwick College	2016	430	897	384	 2014 2015 2016	 2014 2015 2016
00042557	Eastwick College	2016	349	745	382	 2015 2016	 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00036670	Ecotech Institute	2017	257	356	220	
00010190	EDIC College	2017	357	558	349	
00242406	EDIC College	2016	418	1261	651	
00021281	EDP School of Computer Programming	2016	54	175	35	
00020610	Education and Technology Institute	2014	7	15	0	
00011107	Elmira Business Institute	2016	173	381	125	
00020757	Elmira Business Institute	2016	189	448	176	
00060366	Emerging Technologies Institute	2016	10	70	32	
00010602	Empire College	2016	301	565	287	
00010828	Erie Business Center	2014	235	371	151	
00010784	Erie Business Center South	2014	75	148	72	
00023089	Euphoria Institute of Beauty Arts & Sciences	2016	118	251	104	
00023088	Euphoria Institute of Beauty Arts & Sciences - Summerlin	2016	210	448	182	
00010219	Everest College	2016	171	308	103	

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010385	Everest College	2015	258	499	166	73% 2014 2015	66% 2014 2015
00010397	Everest College	2014	479	1234	545	78% 2014	62% 2014
00010407	Everest College	2016	209	483	192	84% 80% 82% 2014 2015 2016	72% 75% 77% 2014 2015 2016
00010564	Everest College	2015	184	343	102	86% 2014 2015	69% 2014 2015
00010678	Everest College	2015	134	275	104	68% 2014 2015	77% 2014 2015
00010748	Everest College	2016	116	225	80	58% 74% 2014 2015 2016	65% 79% 2014 2015 2016
00011101	Everest College	2016	190	405	130	72% 65% 74% 2014 2015 2016	72% 70% 70% 2014 2015 2016
00011147	Everest College	2015	188	376	121	86% 2014 2015	60% 2014 2015
00011314	Everest College	2015	362	587	159	68% 2014 2015	60% 2014 2015
00011315	Everest College	2014	320	619	260	73% 2014	62% 2014
00011333	Everest College	2016	367	611	237	75% 66% 77% 2014 2015 2016	67% 62% 64% 2014 2015 2016
00016100	Everest College	2016	221	507	168	76% 64% 74% 2014 2015 2016	60% 63% 70% 2014 2015 2016
00019026	Everest College	2014	829	1365	725	77% 2014	64% 2014
00020553	Everest College	2016	329	541	117	66% 67% 2014 2015 2016	50% 63% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend			Placement Trend		
		Year	Beginning Population	Total Enrollment	Ending Population						
00020562	Everest College	2016	345	842	302	80%	76%	79%	70%	73%	71%
						2014	2015	2016	2014	2015	2016
00020754	Everest College	2016	286	673	226	71%	70%	71%	59%	69%	70%
						2014	2015	2016	2014	2015	2016
00021509	Everest College	2014	370	248	268	74%			66%		
						2014			2014		
00021861	Everest College	2014	430	276	237	74%			48%		
						2014			2014		
00022270	Everest College	2014	290	207	307	83%			63%		
						2014			2014		
00032431	Everest College	2014	290	702	249	81%			70%		
						2014			2014		
00036352	Everest College	2016	330	621	208	69%	71%	80%	60%	59%	68%
						2014	2015	2016	2014	2015	2016
00073447	Everest College	2015	239	576	197						
						2015			2015		
00147010	Everest College	2016	276	564	192	77%	75%	77%	47%	63%	71%
						2014	2015	2016	2014	2015	2016
00021313	Everest College - McLean	2014	165	153	178	81%			64%		
						2014			2014		
00024720	Everest College - Seattle	2015	103	184	55	81%			75%		
						2014		2015	2014		2015
00010216	Everest Institute	2014	506	935	461	68%			70%		
						2014			2014		
00011177	Everest Institute	2015	414	733	176	68%			64%		
						2014		2015	2014		2015
00021652	Everest Institute	2014	325	808	237	74%			48%		
						2014			2014		

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend	
		Year	Beginning Population	Total Enrollment			Ending Population
00023535	Everest Institute	2014	552	1066	264	68% 2014	44% 2014
00068763	Everest Institute	2014	332	850	294	70% 2014	57% 2014
00024726	Everest Institute - Tigard	2016	201	454	169	87% 2014	71% 2014
						82% 2015	72% 2015
						88% 2016	79% 2016
00010101	Everest University - Brandon	2016	965	1318	268	54% 2014	53% 2014
						49% 2015	51% 2015
						51% 2016	45% 2016
00018879	Everest University - Jacksonville	2016	266	447	36	70% 2014	73% 2014
							43% 2016
							60% 2016
00010876	Everest University - Lakeland	2015	285	552	141	60% 2014	56% 2014
							63% 2015
00012379	Everest University - Melbourne	2016	187	318	92	70% 2014	62% 2014
							63% 2016
00010679	Everest University - North Orlando	2016	272	370	5	70% 2014	65% 2014
							55% 2016
00020976	Everest University - Orange Park	2016	292	755	280	73% 2014	74% 2014
							62% 2016
00011091	Everest University - Pinellas	2016	214	346	92	74% 2014	61% 2014
							45% 2016
00010126	Everest University - Pompano Beach	2016	646	948	255	54% 2014	56% 2014
							43% 2016
00010604	Everest University - South Orlando	2016	8137	13112	4269	43% 2014	49% 2014
							34% 2015
							47% 2016
							43% 2015
							34% 2016
00011334	Everest University - Tampa	2016	294	625	253	72% 2014	54% 2014
							60% 2015
							60% 2016
00247637	Express Training Services	2016	7	16	7	94% 2016	63% 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00044818	Felbry College - School of Nursing	2016	29	97	61	
00022169	Florida Career College	2017	554	982	562	
00149752	Florida Career College	2017	491	1057	591	
00029287	Florida Career College - Boynton Beach	2017	292	520	331	
00020983	Florida Career College - Hialeah	2017	323	567	316	
00234383	Florida Career College - Houston	2017	346	682	410	
00024590	Florida Career College - Jacksonville	2017	271	458	278	
00066572	Florida Career College - Kendall, Florida	2017	28	28	9	
00041942	Florida Career College - Margate	2017	320	583	346	
00011150	Florida Career College - Miami	2017	212	406	262	
00018781	Florida Career College - Pembroke Pines	2017	336	629	370	
00024396	Florida Career College - Riverview	2017	189	326	166	
00020325	Florida Career College - West Palm Beach	2017	344	629	386	
00010598	Florida Technical College	2016	315	705	312	

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00011286	Florida Technical College	2016	608	1418	636	 67% 66% 68% 2014 2015 2016	 81% 70% 68% 2014 2015 2016
00015693	Florida Technical College	2016	577	1326	562	 65% 57% 64% 2014 2015 2016	 73% 73% 61% 2014 2015 2016
00049470	Florida Technical College	2016	1120	2463	1150	 69% 70% 70% 2014 2015 2016	 70% 73% 75% 2014 2015 2016
00070801	Florida Technical College	2016	283	661	328	 64% 68% 71% 2014 2015 2016	 71% 72% 73% 2014 2015 2016
00249348	Florida Technical College	2016	95	587	355	 72% 2016	 77% 2016
00011232	Forrest College	2016	87	165	58	 71% 74% 73% 2014 2015 2016	 96% 100% 79% 2014 2015 2016
00010414	Fortis College	2016	133	306	131	 71% 75% 75% 2014 2015 2016	 76% 80% 72% 2014 2015 2016
00010770	Fortis College	2016	218	562	214	 71% 72% 69% 2014 2015 2016	 70% 70% 72% 2014 2015 2016
00011124	Fortis College	2016	297	700	254	 71% 69% 70% 2014 2015 2016	 74% 69% 70% 2014 2015 2016
00016005	Fortis College	2016	263	625	300	 84% 84% 81% 2014 2015 2016	 82% 88% 81% 2014 2015 2016
00023520	Fortis College	2016	345	963	425	 77% 78% 80% 2014 2015 2016	 77% 81% 70% 2014 2015 2016
00010934	Fortis Institute	2016	420	914	354	 72% 75% 69% 2014 2015 2016	 71% 72% 74% 2014 2015 2016
00020686	Fortis Institute	2014	137	184	17	 74% 2014	 72% 2014
00023927	Fortis Institute	2016	336	841	354	 68% 71% 74% 2014 2015 2016	 72% 77% 80% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00011098	Gallipolis Career College	2017	96	110	63	<p>Retention Trend: 55% (2015), 46% (2016), 62% (2017)</p> <p>Placement Trend: 94% (2015), 64% (2016), 30% (2017)</p>
00010533	Gem City College	2016	20	52	25	<p>Retention Trend: 79% (2014), 83% (2015), 80% (2016)</p> <p>Placement Trend: 94% (2014), 90% (2015), 93% (2016)</p>
00036481	Global Health College	2017	331	424	265	<p>Retention Trend: 81% (2015), 79% (2016), 79% (2017)</p> <p>Placement Trend: 65% (2015), 40% (2016), 39% (2017)</p>
00010898	Globe University	2016	494	944	338	<p>Retention Trend: 69% (2014), 69% (2015), 64% (2016)</p> <p>Placement Trend: 75% (2014), 70% (2015), 75% (2016)</p>
00034396	Globe University - Green Bay	2015	144	300	103	<p>Retention Trend: 66% (2014), 66% (2015)</p> <p>Placement Trend: 76% (2014), 76% (2015)</p>
00024832	Globe University - La Crosse	2016	121	230	83	<p>Retention Trend: 73% (2014), 70% (2015), 73% (2016)</p> <p>Placement Trend: 83% (2014), 81% (2015), 75% (2016)</p>
00024695	Globe University - Middleton	2015	143	290	114	<p>Retention Trend: 71% (2014), 71% (2015)</p> <p>Placement Trend: 81% (2014), 81% (2015)</p>
00023928	Globe University - Minneapolis	2017	160	200	29	<p>Retention Trend: 71% (2015), 75% (2016), 50% (2017)</p> <p>Placement Trend: 84% (2015), 84% (2016), 84% (2017)</p>
00024131	Globe University - Sioux Falls	2016	82	188	72	<p>Retention Trend: 68% (2014), 60% (2015), 68% (2016)</p> <p>Placement Trend: 74% (2014), 91% (2015), 80% (2016)</p>
00023885	Globe University-Moorhead	2016	77	130	46	<p>Retention Trend: 65% (2014), 69% (2015), 70% (2016)</p> <p>Placement Trend: 68% (2014), 75% (2015), 69% (2016)</p>
00023565	Golden State College of Court Reporting & Captioning	2016	41	58	38	<p>Retention Trend: 76% (2014), 76% (2015), 81% (2016)</p> <p>Placement Trend: 60% (2014), 60% (2015), 63% (2016)</p>
00011148	Golf Academy of America	2017	92	133	74	<p>Retention Trend: 88% (2015), 82% (2016), 89% (2017)</p> <p>Placement Trend: 81% (2015), 76% (2016), 50% (2017)</p>
00011174	Golf Academy of America	2017	107	158	89	<p>Retention Trend: 86% (2015), 78% (2016), 82% (2017)</p> <p>Placement Trend: 83% (2015), 85% (2016), 58% (2017)</p>
00015752	Golf Academy of America	2017	134	206	108	<p>Retention Trend: 82% (2015), 83% (2016), 87% (2017)</p> <p>Placement Trend: 80% (2015), 80% (2016), 29% (2017)</p>

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00093164	Golf Academy of America	2017	84	116	56	 85% 79% 86% 2015 2016 2017 83% 72% 59% 2015 2016 2017
00012797	Golf Academy of America	2017	92	130	65	 87% 82% 86% 2015 2016 2017 93% 75% 54% 2015 2016 2017
00270273	GROOVE U	2016	18	31	23	 97% 2016 100% 2016
00225702	Guglielmo Marconi University	2016	12391	15995	13363	 96% 94% 2015 2016 45% 12% 2015 2016
00011909	Gwinnett College	2016	308	652	320	 71% 66% 70% 2014 2015 2016 83% 83% 79% 2014 2015 2016
00269949	Gwinnett Institute	2016	460	848	388	 76% 2016 65% 2016
00010547	Harris School of Business	2016	303	685	211	 75% 71% 62% 2014 2015 2016 69% 58% 72% 2014 2015 2016
00022418	Harris School of Business	2016	258	503	181	 76% 75% 81% 2014 2015 2016 63% 53% 63% 2014 2015 2016
00023260	Harris School of Business	2016	157	336	121	 78% 72% 68% 2014 2015 2016 71% 61% 79% 2014 2015 2016
00044871	Harris School of Business	2017	340	774	347	 56% 57% 63% 2015 2016 2017 32% 61% 56% 2015 2016 2017
00231204	Harris School of Business	2016	9	44	3	 97% 89% 2014 2016 87% 68% 2014 2016
00255005	Harris-Casel Institute	2017	25	53	19	 91% 83% 2016 2017 43% 0% 2016 2017
00010427	Harrison College	2016	402	926	387	 61% 63% 2014 2016 84% 73% 2014 2016
00010513	Harrison College	2016	1100	2001	739	 60% 53% 2014 2016 79% 68% 2014 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend			Placement Trend		
		Year	Beginning Population	Total Enrollment	Ending Population						
00010531	Harrison College	2016	218	461	184	56%	57%	82%	77%		
						2014	2015	2016	2014	2015	2016
00010618	Harrison College	2016	204	450	186	60%	59%	81%	64%		
						2014	2015	2016	2014	2015	2016
00010882	Harrison College	2016	238	446	189	64%	62%	84%	67%		
						2014	2015	2016	2014	2015	2016
00011100	Harrison College	2016	192	453	150	61%	50%	80%	62%		
						2014	2015	2016	2014	2015	2016
00011233	Harrison College	2016	204	379	200	67%	67%	82%	74%		
						2014	2015	2016	2014	2015	2016
00018769	Harrison College	2016	208	396	163	60%	56%	82%	82%		
						2014	2015	2016	2014	2015	2016
00021828	Harrison College	2016	205	321	159	75%	74%	76%	71%		
						2014	2015	2016	2014	2015	2016
00023388	Harrison College	2016	59	165	66	50%	58%	72%	55%		
						2014	2015	2016	2014	2015	2016
00024638	Harrison College	2016	273	534	257	61%	60%	76%	81%		
						2014	2015	2016	2014	2015	2016
00039183	Herguan University	2016	197	427	266	70%		71%			
						2016		2016			
00010133	Hickey College	2016	344	674	328	87%	90%	89%	97%	99%	96%
						2014	2015	2016	2014	2015	2016
00234214	Hondros College of Business	2016	20	39	22	64%		100%			
						2016		2016			
00010429	Hondros College of Nursing	2016	745	1443	621	75%	74%	70%	75%	76%	71%
						2014	2015	2016	2014	2015	2016
00012815	Hondros College of Nursing	2016	213	510	192	76%	72%	65%	78%	72%	72%
						2014	2015	2016	2014	2015	2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00024783	Hondros College of Nursing	2016	232	577	251	
00048971	Hondros College of Nursing	2017	302	620	282	
00246030	Hondros College of Nursing	2016	0	0	0	
00238949	Hope College of Arts & Sciences	2016	89	121	48	
00238527	Houstons Training and Education Center	2017	2	10	9	
00011123	Humacao Community College	2016	500	899	472	
00010696	Hunter Business School	2017	348	601	298	
00022604	Hunter Business School	2016	327	829	263	
00012706	IBMC College	2016	218	460	164	
00021776	IBMC College	2016	152	325	131	
00023835	IBMC College	2016	321	640	270	
00042287	IBMC College	2016	231	507	209	
00268479	IBMC College	2016	0	443	152	
00051218	Iglobal University	2016	263	626	383	

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010355	Instituto de Banca y Comercio	2016	523	1379	461	 2014 2015 2016	 2014 2015 2016
00010460	Instituto de Banca y Comercio	2016	438	1027	396	 2014 2015 2016	 2014 2015 2016
00010637	Instituto de Banca y Comercio	2015	526	1193	397	 2014 2015	 2014 2015
00010922	Instituto de Banca y Comercio	2016	512	1157	426	 2014 2015 2016	 2014 2015 2016
00011144	Instituto de Banca y Comercio	2016	326	800	310	 2014 2015 2016	 2014 2015 2016
00011159	Instituto de Banca y Comercio	2016	718	1813	682	 2014 2015 2016	 2014 2015 2016
00011162	Instituto de Banca y Comercio	2016	502	1220	461	 2014 2015 2016	 2014 2015 2016
00015652	Instituto de Banca y Comercio	2016	0	537	207	 2016	 2016
00018827	Instituto de Banca y Comercio	2016	749	2500	958	 2014 2015 2016	 2014 2015 2016
00021183	Instituto de Banca y Comercio	2016	320	835	324	 2014 2015 2016	 2014 2015 2016
00022415	Instituto de Banca y Comercio	2016	0	612	229	 2016	 2016
00022990	Instituto de Banca y Comercio	2016	372	829	275	 2014 2015 2016	 2014 2015 2016
00033225	Instituto de Banca y Comercio	2016	961	2139	764	 2014 2015 2016	 2014 2015 2016
00051200	Instituto de Banca y Comercio	2016	0	947	350	 2016	 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00237359	Instituto de Banca y Comercio, Los Colobos	2016	0	1105	442	<p>71% 71%</p> <p>2014 2016</p>	<p>66% 70%</p> <p>2014 2016</p>
00024698	Instituto de Banca y Comercio-Escorial	2016	846	2001	717	<p>73% 73% 72%</p> <p>2014 2015 2016</p>	<p>60% 72% 70%</p> <p>2014 2015 2016</p>
00228039	Inter-American Defense College	2016	1	68	1	<p>88%</p> <p>2016</p>	<p>100%</p> <p>2016</p>
00020842	International Academy of Design and Technology	2015	195	208	66	<p>62%</p> <p>2014 2015</p>	<p>53%</p> <p>2014 2015</p>
00021429	International Academy of Design and Technology	2015	57	60	5	<p>83%</p> <p>2014 2015</p>	<p>72%</p> <p>2014 2015</p>
00022163	International Academy of Design and Technology	2015	82	88	21	<p>61%</p> <p>2014 2015</p>	<p>72%</p> <p>2014 2015</p>
00010157	International Business College	2015	49	85	29	<p>75%</p> <p>2014 2015</p>	<p>83%</p> <p>2014 2015</p>
00011196	International Business College	2016	221	467	193	<p>85% 86% 87%</p> <p>2014 2015 2016</p>	<p>81% 83% 75%</p> <p>2014 2015 2016</p>
00011199	International Business College	2016	204	442	171	<p>87% 86% 81%</p> <p>2014 2015 2016</p>	<p>82% 88% 87%</p> <p>2014 2015 2016</p>
00012115	International Business College	2015	76	152	80	<p>81%</p> <p>2014 2015</p>	<p>88%</p> <p>2014 2015</p>
00165233	International Career Institute	2016	33	68	40	<p>0%</p> <p>2016</p>	<p>61%</p> <p>2016</p>
00245831	International College of Health Sciences	2016	87	188	121	<p>88%</p> <p>2016</p>	<p>88%</p> <p>2016</p>
00010431	International College of the Cayman Islands	2016	176	266	195	<p>76% 85%</p> <p>2014 2015 2016</p>	<p>93% 90%</p> <p>2014 2015 2016</p>
00010175	ITT Technical Institute	2015	209	357	157	<p>75%</p> <p>2014 2015</p>	<p>62%</p> <p>2014 2015</p>

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00011243	ITT Technical Institute	2015	478	1035	466	67% 2014 ----- 2015	74% 2014 ----- 2015
00012822	ITT Technical Institute	2015	242	361	146	76% 2014 ----- 2015	75% 2014 ----- 2015
00015959	ITT Technical Institute	2015	244	563	224	68% 2014 ----- 2015	76% 2014 ----- 2015
00016032	ITT Technical Institute	2015	624	1160	593	82% 2014 ----- 2015	73% 2014 ----- 2015
00016033	ITT Technical Institute	2015	417	831	390	69% 2014 ----- 2015	79% 2014 ----- 2015
00016034	ITT Technical Institute	2015	898	1539	765	76% 2014 ----- 2015	72% 2014 ----- 2015
00016035	ITT Technical Institute	2015	543	1233	548	59% 2014 ----- 2015	72% 2014 ----- 2015
00016036	ITT Technical Institute	2015	259	532	237	67% 2014 ----- 2015	68% 2014 ----- 2015
00016037	ITT Technical Institute	2015	426	866	411	66% 2014 ----- 2015	84% 2014 ----- 2015
00016038	ITT Technical Institute	2015	467	1012	455	62% 2014 ----- 2015	66% 2014 ----- 2015
00016039	ITT Technical Institute	2015	264	508	246	77% 2014 ----- 2015	71% 2014 ----- 2015
00016040	ITT Technical Institute	2015	4041	9335	790	48% 2014 ----- 2015	62% 2014 ----- 2015
00016041	ITT Technical Institute	2015	592	1261	644	68% 2014 ----- 2015	81% 2014 ----- 2015
00016042	ITT Technical Institute	2015	293	629	260	60% 2014 ----- 2015	63% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00016043	ITT Technical Institute	2015	479	903	426	73% 2014 ----- 2015	75% 2014 ----- 2015
00016044	ITT Technical Institute	2015	262	559	242	59% 2014 ----- 2015	55% 2014 ----- 2015
00016045	ITT Technical Institute	2015	221	446	177	70% 2014 ----- 2015	75% 2014 ----- 2015
00016046	ITT Technical Institute	2015	425	820	296	67% 2014 ----- 2015	75% 2014 ----- 2015
00016047	ITT Technical Institute	2015	282	849	381	72% 2014 ----- 2015	71% 2014 ----- 2015
00016048	ITT Technical Institute	2015	534	909	439	76% 2014 ----- 2015	89% 2014 ----- 2015
00016049	ITT Technical Institute	2015	212	349	135	66% 2014 ----- 2015	71% 2014 ----- 2015
00016050	ITT Technical Institute	2015	500	1193	579	57% 2014 ----- 2015	74% 2014 ----- 2015
00016051	ITT Technical Institute	2015	249	581	279	67% 2014 ----- 2015	83% 2014 ----- 2015
00016052	ITT Technical Institute	2015	406	799	389	72% 2014 ----- 2015	71% 2014 ----- 2015
00016053	ITT Technical Institute	2015	516	1075	511	70% 2014 ----- 2015	71% 2014 ----- 2015
00016054	ITT Technical Institute	2015	220	461	193	66% 2014 ----- 2015	73% 2014 ----- 2015
00016055	ITT Technical Institute	2015	710	1409	560	69% 2014 ----- 2015	73% 2014 ----- 2015
00016056	ITT Technical Institute	2015	367	824	347	59% 2014 ----- 2015	66% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00016057	ITT Technical Institute	2015	409	745	368	62% 2014 ----- 2015	64% 2014 ----- 2015
00016058	ITT Technical Institute	2015	297	538	274	71% 2014 ----- 2015	76% 2014 ----- 2015
00016059	ITT Technical Institute	2015	460	849	402	71% 2014 ----- 2015	76% 2014 ----- 2015
00016060	ITT Technical Institute	2015	575	1038	533	76% 2014 ----- 2015	71% 2014 ----- 2015
00016061	ITT Technical Institute	2015	293	562	297	69% 2014 ----- 2015	80% 2014 ----- 2015
00016062	ITT Technical Institute	2015	488	999	484	78% 2014 ----- 2015	75% 2014 ----- 2015
00016063	ITT Technical Institute	2015	270	525	243	71% 2014 ----- 2015	71% 2014 ----- 2015
00016064	ITT Technical Institute	2015	639	1349	696	70% 2014 ----- 2015	74% 2014 ----- 2015
00016065	ITT Technical Institute	2015	302	621	291	67% 2014 ----- 2015	75% 2014 ----- 2015
00016066	ITT Technical Institute	2015	527	1079	517	67% 2014 ----- 2015	72% 2014 ----- 2015
00016067	ITT Technical Institute	2015	453	994	468	67% 2014 ----- 2015	73% 2014 ----- 2015
00016068	ITT Technical Institute	2015	555	1081	530	70% 2014 ----- 2015	76% 2014 ----- 2015
00016069	ITT Technical Institute	2015	528	1076	451	66% 2014 ----- 2015	72% 2014 ----- 2015
00016070	ITT Technical Institute	2015	705	1314	670	75% 2014 ----- 2015	72% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00016071	ITT Technical Institute	2015	1085	1798	720	70% 2014 ----- 2015	70% 2014 ----- 2015
00016073	ITT Technical Institute	2015	441	894	428	75% 2014 ----- 2015	73% 2014 ----- 2015
00016074	ITT Technical Institute	2015	303	547	253	75% 2014 ----- 2015	70% 2014 ----- 2015
00016075	ITT Technical Institute	2015	374	708	368	75% 2014 ----- 2015	71% 2014 ----- 2015
00016076	ITT Technical Institute	2015	222	485	209	63% 2014 ----- 2015	64% 2014 ----- 2015
00016077	ITT Technical Institute	2015	400	901	402	65% 2014 ----- 2015	74% 2014 ----- 2015
00016078	ITT Technical Institute	2015	553	1105	557	73% 2014 ----- 2015	71% 2014 ----- 2015
00016079	ITT Technical Institute	2015	420	1025	448	69% 2014 ----- 2015	77% 2014 ----- 2015
00016080	ITT Technical Institute	2015	203	387	153	67% 2014 ----- 2015	73% 2014 ----- 2015
00016081	ITT Technical Institute	2015	435	714	375	78% 2014 ----- 2015	72% 2014 ----- 2015
00016082	ITT Technical Institute	2015	474	924	514	76% 2014 ----- 2015	83% 2014 ----- 2015
00016083	ITT Technical Institute	2015	497	973	452	71% 2014 ----- 2015	62% 2014 ----- 2015
00016084	ITT Technical Institute	2015	410	832	348	66% 2014 ----- 2015	64% 2014 ----- 2015
00016085	ITT Technical Institute	2015	551	946	447	74% 2014 ----- 2015	71% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00016087	ITT Technical Institute	2015	317	656	288	67% 2014 ----- 2015	62% 2014 ----- 2015
00016088	ITT Technical Institute	2015	309	602	241	65% 2014 ----- 2015	67% 2014 ----- 2015
00016089	ITT Technical Institute	2015	427	890	410	66% 2014 ----- 2015	83% 2014 ----- 2015
00016090	ITT Technical Institute	2015	247	538	218	63% 2014 ----- 2015	73% 2014 ----- 2015
00016092	ITT Technical Institute	2015	424	794	338	69% 2014 ----- 2015	76% 2014 ----- 2015
00016093	ITT Technical Institute	2015	231	442	210	70% 2014 ----- 2015	82% 2014 ----- 2015
00016094	ITT Technical Institute	2015	372	764	393	80% 2014 ----- 2015	71% 2014 ----- 2015
00016095	ITT Technical Institute	2015	602	1207	586	74% 2014 ----- 2015	81% 2014 ----- 2015
00018832	ITT Technical Institute	2015	359	574	305	74% 2014 ----- 2015	78% 2014 ----- 2015
00018925	ITT Technical Institute	2015	117	152	47	55% 2014 ----- 2015	69% 2014 ----- 2015
00019028	ITT Technical Institute	2015	356	639	370	78% 2014 ----- 2015	74% 2014 ----- 2015
00019591	ITT Technical Institute	2015	746	1621	763	73% 2014 ----- 2015	71% 2014 ----- 2015
00019730	ITT Technical Institute	2015	392	697	328	73% 2014 ----- 2015	76% 2014 ----- 2015
00020099	ITT Technical Institute	2015	533	989	462	79% 2014 ----- 2015	83% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00020213	ITT Technical Institute	2015	295	579	283	71% 2014 ----- 2015	73% 2014 ----- 2015
00020606	ITT Technical Institute	2015	595	1018	485	71% 2014 ----- 2015	75% 2014 ----- 2015
00020844	ITT Technical Institute	2015	342	693	338	68% 2014 ----- 2015	82% 2014 ----- 2015
00020888	ITT Technical Institute	2015	216	400	160	72% 2014 ----- 2015	75% 2014 ----- 2015
00021679	ITT Technical Institute	2015	386	747	351	70% 2014 ----- 2015	74% 2014 ----- 2015
00021681	ITT Technical Institute	2015	279	569	230	57% 2014 ----- 2015	76% 2014 ----- 2015
00021736	ITT Technical Institute	2015	474	925	450	71% 2014 ----- 2015	74% 2014 ----- 2015
00021962	ITT Technical Institute	2015	213	483	210	69% 2014 ----- 2015	75% 2014 ----- 2015
00021963	ITT Technical Institute	2015	409	846	419	62% 2014 ----- 2015	66% 2014 ----- 2015
00022040	ITT Technical Institute	2015	539	1266	568	69% 2014 ----- 2015	71% 2014 ----- 2015
00022051	ITT Technical Institute	2015	509	904	388	73% 2014 ----- 2015	83% 2014 ----- 2015
00022338	ITT Technical Institute	2015	369	686	279	61% 2014 ----- 2015	74% 2014 ----- 2015
00022365	ITT Technical Institute	2015	381	794	349	72% 2014 ----- 2015	70% 2014 ----- 2015
00022403	ITT Technical Institute	2015	313	720	392	63% 2014 ----- 2015	61% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00022410	ITT Technical Institute	2015	363	802	356	80% 2014 ----- 2015	67% 2014 ----- 2015
00022752	ITT Technical Institute	2014	340	622	292	70% ----- 2014	73% ----- 2014
00022806	ITT Technical Institute	2015	298	708	296	60% 2014 ----- 2015	65% 2014 ----- 2015
00022854	ITT Technical Institute	2015	328	678	295	66% 2014 ----- 2015	62% 2014 ----- 2015
00022855	ITT Technical Institute	2015	180	322	153	71% 2014 ----- 2015	71% 2014 ----- 2015
00022856	ITT Technical Institute	2015	197	399	183	61% 2014 ----- 2015	73% 2014 ----- 2015
00022947	ITT Technical Institute	2014	208	208	34	87% ----- 2014	71% ----- 2014
00023268	ITT Technical Institute	2015	314	728	285	59% 2014 ----- 2015	68% 2014 ----- 2015
00023310	ITT Technical Institute	2015	259	291	101	71% 2014 ----- 2015	80% 2014 ----- 2015
00023473	ITT Technical Institute	2015	263	463	163	64% 2014 ----- 2015	72% 2014 ----- 2015
00023482	ITT Technical Institute	2015	618	1474	673	65% 2014 ----- 2015	65% 2014 ----- 2015
00023509	ITT Technical Institute	2015	193	365	135	64% 2014 ----- 2015	75% 2014 ----- 2015
00023521	ITT Technical Institute	2015	664	1372	606	63% 2014 ----- 2015	56% 2014 ----- 2015
00023596	ITT Technical Institute	2015	450	984	418	59% 2014 ----- 2015	73% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00023672	ITT Technical Institute	2015	226	430	174	65% 2014 ----- 2015	72% 2014 ----- 2015
00023785	ITT Technical Institute	2015	452	875	377	65% 2014 ----- 2015	76% 2014 ----- 2015
00023854	ITT Technical Institute	2014	277	533	254	67% ----- 2014	73% ----- 2014
00023855	ITT Technical Institute	2015	328	624	293	65% 2014 ----- 2015	75% 2014 ----- 2015
00023908	ITT Technical Institute	2015	235	455	216	62% 2014 ----- 2015	74% 2014 ----- 2015
00023951	ITT Technical Institute	2015	134	333	141	61% 2014 ----- 2015	85% 2014 ----- 2015
00024017	ITT Technical Institute	2015	330	713	330	65% 2014 ----- 2015	68% 2014 ----- 2015
00024018	ITT Technical Institute	2015	155	310	141	62% 2014 ----- 2015	72% 2014 ----- 2015
00024233	ITT Technical Institute	2015	224	504	266	71% 2014 ----- 2015	64% 2014 ----- 2015
00024321	ITT Technical Institute	2015	209	477	214	58% 2014 ----- 2015	78% 2014 ----- 2015
00024404	ITT Technical Institute	2015	212	406	162	67% 2014 ----- 2015	61% 2014 ----- 2015
00024502	ITT Technical Institute	2015	177	327	102	68% 2014 ----- 2015	79% 2014 ----- 2015
00024705	ITT Technical Institute	2015	381	720	359	72% 2014 ----- 2015	72% 2014 ----- 2015
00024706	ITT Technical Institute	2015	368	625	273	75% 2014 ----- 2015	75% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00024817	ITT Technical Institute	2015	402	838	363	66% 2014 ----- 2015	73% 2014 ----- 2015
00024846	ITT Technical Institute	2015	475	828	389	76% 2014 ----- 2015	76% 2014 ----- 2015
00024922	ITT Technical Institute	2015	210	445	204	60% 2014 ----- 2015	72% 2014 ----- 2015
00025524	ITT Technical Institute	2015	253	543	234	66% 2014 ----- 2015	51% 2014 ----- 2015
00026876	ITT Technical Institute	2015	408	742	389	76% 2014 ----- 2015	74% 2014 ----- 2015
00026877	ITT Technical Institute	2015	241	493	233	72% 2014 ----- 2015	72% 2014 ----- 2015
00029681	ITT Technical Institute	2015	139	340	138	59% 2014 ----- 2015	50% 2014 ----- 2015
00031637	ITT Technical Institute	2014	55	55	10	65% ----- 2014	84% ----- 2014
00033146	ITT Technical Institute	2015	165	381	173	60% 2014 ----- 2015	73% 2014 ----- 2015
00033780	ITT Technical Institute	2015	272	635	284	54% 2014 ----- 2015	74% 2014 ----- 2015
00039163	ITT Technical Institute	2015	183	377	137	61% 2014 ----- 2015	63% 2014 ----- 2015
00039170	ITT Technical Institute	2014	111	124	30	46% ----- 2014	62% ----- 2014
00039864	ITT Technical Institute	2015	319	622	316	73% 2014 ----- 2015	72% 2014 ----- 2015
00043247	ITT Technical Institute	2015	168	394	195	65% 2014 ----- 2015	75% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00045221	ITT Technical Institute	2015	440	514	151	69% 2014 ----- 2015	72% 2014 ----- 2015
00045901	ITT Technical Institute	2015	165	378	158	54% 2014 ----- 2015	71% 2014 ----- 2015
00062296	ITT Technical Institute	2015	196	598	270	62% 2014 ----- 2015	85% 2014 ----- 2015
00066083	ITT Technical Institute	2015	347	918	422	77% 2014 ----- 2015	73% 2014 ----- 2015
00069154	ITT Technical Institute	2015	312	680	257	55% 2014 ----- 2015	77% 2014 ----- 2015
00069159	ITT Technical Institute	2015	767	1544	791	69% 2014 ----- 2015	77% 2014 ----- 2015
00070456	ITT Technical Institute	2015	194	461	191	64% 2014 ----- 2015	100% 2014 ----- 2015
00070459	ITT Technical Institute	2015	301	657	311	68% 2014 ----- 2015	84% 2014 ----- 2015
00070461	ITT Technical Institute	2014	135	133	19	45% ----- 2014	82% ----- 2014
00071123	ITT Technical Institute	2015	370	675	380	75% 2014 ----- 2015	74% 2014 ----- 2015
00096942	ITT Technical Institute	2014	73	73	6	42% ----- 2014	77% ----- 2014
00096945	ITT Technical Institute	2015	131	131	8	57% 2014 ----- 2015	77% 2014 ----- 2015
00101789	ITT Technical Institute	2015	160	364	152	66% 2014 ----- 2015	84% 2014 ----- 2015
00107729	ITT Technical Institute	2015	151	352	179	53% 2014 ----- 2015	75% 2014 ----- 2015

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend	
		Year	Beginning Population	Total Enrollment			Ending Population
00107782	ITT Technical Institute	2015	183	262	98	64% 2014 2015	96% 2014 2015
00108251	ITT Technical Institute	2014	107	297	189	69% 2014	0% 2014
00114885	ITT Technical Institute	2015	257	433	210	68% 2014 2015	75% 2014 2015
00118226	ITT Technical Institute	2015	19	19	5	46% 2014 2015	91% 2014 2015
00010273	Jones College	2016	324	478	207	74% 59% 56% 2014 2015 2016	61% 46% 50% 2014 2015 2016
00010729	Jones College	2014	218	323	0	15% 2014	61% 2014
00022465	Jose Maria Vargas University	2017	20	95	43	98% 84% 82% 2015 2016 2017	100% 39% 14% 2015 2016 2017
00036388	Kaplan College	2014	187	396	129	68% 2014	67% 2014
00171022	Kaplan College	2016	213	317	14	73% 69% 2014 2015 2016	70% 9% 2014 2015 2016
00010845	Key College	2016	46	103	64	78% 70% 2014 2015 2016	90% 75% 2014 2015 2016
00010191	King's College	2016	187	513	180	84% 85% 84% 2014 2015 2016	88% 89% 87% 2014 2015 2016
00108660	Kingston University	2016	31	53	33	71% 2016	80% 2016
00010663	Lansdale School of Business	2016	273	444	234	81% 82% 84% 2014 2015 2016	75% 78% 76% 2014 2015 2016
00114572	Lasalle Computer Learning Center, Inc.	2016	0	0	0	100% 0% 2014 2016	100% 0% 2014 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend			Placement Trend		
		Year	Beginning Population	Total Enrollment	Ending Population						
00010825	Laurel Business Institute	2016	154	350	156	80%	78%	80%	85%	87%	85%
						2014	2015	2016	2014	2015	2016
00010641	Laurel Technical Institute	2016	79	169	76	77%		74%	91%		89%
						2015		2016	2015		2016
00010838	Laurel Technical Institute	2016	125	256	113	76%	78%	73%	82%	84%	85%
						2014	2015	2016	2014	2015	2016
00023501	Laurus College	2016	299	391	188	77%	78%	66%	72%	80%	84%
						2014	2015	2016	2014	2015	2016
00060414	Laurus College	2016	888	1531	889	80%	79%	71%	73%	76%	79%
						2014	2015	2016	2014	2015	2016
00019019	Le Cordon Bleu College of Culinary Arts	2016	1095	1856	709	78%		74%	90%	91%	89%
						2014	2015	2016	2014	2015	2016
00019776	Le Cordon Bleu College of Culinary Arts	2016	646	1157	415	74%	75%	74%	82%	86%	87%
						2014	2015	2016	2014	2015	2016
00021352	Le Cordon Bleu College of Culinary Arts	2016	432	732	268	78%		74%	80%	84%	75%
						2014	2015	2016	2014	2015	2016
00023522	Le Cordon Bleu College of Culinary Arts	2016	268	442	136	84%	78%	72%	74%	81%	86%
						2014	2015	2016	2014	2015	2016
00023542	Le Cordon Bleu College of Culinary Arts	2016	607	1089	389	75%	74%	71%	88%	90%	84%
						2014	2015	2016	2014	2015	2016
00023929	Le Cordon Bleu College of Culinary Arts	2016	301	603	227	77%	73%	70%	74%	82%	77%
						2014	2015	2016	2014	2015	2016
00024557	Le Cordon Bleu College of Culinary Arts	2016	141	153	27	82%		86%	85%		88%
						2014	2015	2016	2014	2015	2016
00038353	Le Cordon Bleu College of Culinary Arts	2016	267	512	165	76%	75%	69%	83%	89%	86%
						2014	2015	2016	2014	2015	2016
00038375	Le Cordon Bleu College of Culinary Arts	2016	241	434	125	74%		69%	81%	88%	86%
						2014	2015	2016	2014	2015	2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00038381	Le Cordon Bleu College of Culinary Arts	2016	789	1393	507	 2014 2015 2016	 2014 2015 2016
00048157	Le Cordon Bleu College of Culinary Arts	2016	434	682	241	 2014 2015 2016	 2014 2015 2016
00048280	Le Cordon Bleu College of Culinary Arts	2016	264	488	168	 2014 2015 2016	 2014 2015 2016
00048109	Le Cordon Bleu College of Culinary Arts Boston	2016	272	410	129	 2014 2015 2016	 2014 2015 2016
00048561	Le Cordon Bleu College of Culinary Arts In Miami	2016	614	1031	458	 2014 2015 2016	 2014 2015 2016
00048705	Le Cordon Bleu College of Culinary Arts Scottsdale	2016	1006	1784	622	 2014 2015 2016	 2014 2015 2016
00024275	Learnnet Academy, Inc.	2016	271	476	211	 2014 2015 2016	 2014 2015 2016
00250872	Life Line Med Training	2016	17	40	12	 2016	 2016
00010895	Lighthouse College	2014	3	17	11	 2014	 2014
00019351	Lincoln College of Technology	2016	187	537	231	 2014 2015 2016	 2014 2015 2016
00020180	Lincoln College of Technology	2016	510	1038	406	 2014 2015 2016	 2014 2015 2016
00010950	Lincoln Technical Institute	2016	299	665	265	 2014 2015 2016	 2014 2015 2016
00011304	Lincoln Technical Institute	2016	376	771	319	 2014 2015 2016	 2014 2015 2016
00012781	Lincoln Technical Institute	2016	277	606	228	 2014 2015 2016	 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00012783	Lincoln Technical Institute	2016	216	509	212	 2014 2015 2016	 2014 2015 2016
00012784	Lincoln Technical Institute	2016	418	951	407	 2014 2015 2016	 2014 2015 2016
00015671	Lincoln Technical Institute	2016	403	917	367	 2014 2015 2016	 2014 2015 2016
00019355	Lincoln Technical Institute	2016	187	432	159	 2014 2015 2016	 2014 2015 2016
00019357	Lincoln Technical Institute	2016	300	813	304	 2014 2015 2016	 2014 2015 2016
00019398	Lincoln Technical Institute	2016	200	424	155	 2014 2015 2016	 2014 2015 2016
00010193	Lincoln University	2016	654	1214	817	 2014 2015 2016	 2014 2015 2016
00023814	Living Arts College @ School of Communication Arts	2017	172	220	119	 2015 2016 2017	 2015 2016 2017
00033024	Living Arts Institute @ School of Communication Arts	2017	86	201	92	 2015 2016 2017	 2015 2016 2017
00010215	Long Island Business Institute	2016	91	137	91	 2014 2015 2016	 2014 2015 2016
00019325	Long Island Business Institute	2016	962	2346	935	 2014 2015 2016	 2014 2015 2016
00253255	Louisiana Culinary Institute	2016	155	270	152	 2016	 2016
00262761	Madison Media Institute	2016	245	562	226	 2016	 2016
00059982	Manhattan Institute of Management	2016	28	28	27	 2014 2015 2016	 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00012511	Manhattan School of Computer Technology	2016	332	889	364	76% 2014 67% 2015 70% 2016	67% 2014 69% 2015 73% 2016
00270017	Marconi International University, Inc.	2016	0	12	12	100% 2016	0% 2016
00023121	Mattia College	2015	213	600	260	78% 2014 2015	48% 2014 2015
00010107	MBTI Business Training Institute	2015	2481	5709	2112	66% 2014 2015	36% 2014 2015
00039406	MBTI Business Training Institute	2014	0	1407	570	72% 2014	28% 2014
00070623	MBTI Business Training Institute	2014	0	1035	383	69% 2014	40% 2014
00039407	MBTI Business Training Institute - Bayamon	2014	0	1286	506	64% 2014	38% 2014
00029269	McCann School of Business & Technology	2016	198	338	166	75% 2014 76% 2015 79% 2016	71% 2014 81% 2015 78% 2016
00010936	McCann School of Business & Technology	2016	241	453	206	74% 2014 72% 2015 75% 2016	81% 2014 77% 2015 61% 2016
00011194	McCann School of Business & Technology	2016	197	390	199	77% 2014 72% 2015 75% 2016	75% 2014 80% 2015 82% 2016
00015773	McCann School of Business & Technology	2016	264	503	239	79% 2014 60% 2015 75% 2016	73% 2014 79% 2015 81% 2016
00020097	McCann School of Business & Technology	2016	191	331	128	71% 2014 71% 2015 68% 2016	85% 2014 71% 2015 72% 2016
00024762	McCann School of Business & Technology	2016	520	1026	480	75% 2014 72% 2015 71% 2016	74% 2014 79% 2015 76% 2016
00108012	McCann School of Business & Technology	2016	202	334	166	67% 2015 73% 2016	74% 2015 61% 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00045494	McCann School of Business and Technology	2016	518	1135	529	 2014 2015 2016	 2014 2015 2016
00045500	McCann School of Business and Technology	2016	234	470	185	 2014 2015 2016	 2014 2015 2016
00101382	MDT College of Health Sciences, Inc, Db a ATS Institute of Technology	2017	208	296	216	 2015 2016 2017	 2015 2016 2017
00016303	MDT College of Health Sciences, Inc.	2017	94	201	121	 2015 2016 2017	 2015 2016 2017
00021231	Medtech College	2015	679	1171	394	 2014 2015	 2014 2015
00023595	Medtech College	2015	472	752	280	 2014 2015	 2014 2015
00024144	Medtech College	2015	475	850	335	 2014 2015	 2014 2015
00024843	Medtech College-Lexington	2015	228	664	258	 2014 2015	 2014 2015
00010341	Metro Business College	2016	92	177	59	 2014 2015 2016	 2014 2015 2016
00010399	Metro Business College	2016	92	205	86	 2014 2015 2016	 2014 2015 2016
00010937	Metro Business College	2016	58	118	44	 2014 2015 2016	 2014 2015 2016
00023424	Metro Business College	2014	45	94	26	 2014	 2014
00179004	Miami Regional University	2016	0	7	1	 2016	 2016
00179009	Miami Regional University	2016	606	1950	1206	 2016	 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010254	Miami-Jacobs Career College	2016	108	229	102	 2014 2015 2016	 2014 2015 2016
00010524	Miami-Jacobs Career College	2017	140	220	109	 2015 2016 2017	 2015 2016 2017
00011253	Miami-Jacobs Career College	2017	327	575	274	 2015 2016 2017	 2015 2016 2017
00019917	Miami-Jacobs Career College	2015	125	152	50	 2014 2015	 2014 2015
00022116	Miami-Jacobs Career College	2016	93	159	65	 2014 2015 2016	 2014 2015 2016
00023417	Miami-Jacobs Career College	2016	145	258	120	 2014 2015 2016	 2014 2015 2016
00023385	Michigan Jewish Institute - The Shul	2015	1159	3348	3197	 2014 2015	 2014 2015
00010857	Mildred Elley	2016	225	541	246	 2014 2015 2016	 2014 2015 2016
00011226	Mildred Elley	2016	680	1517	646	 2014 2015 2016	 2014 2015 2016
00032898	Mildred Elley-New York City	2016	824	1927	924	 2014 2015 2016	 2014 2015 2016
00027636	Millennia Atlantic University	2016	327	437	259	 2014 2015 2016	 2014 2015 2016
00010233	Miller-Motte College	2017	2706	5017	2280	 2015 2016 2017	 2015 2016 2017
00021570	Miller-Motte College	2016	308	639	279	 2014 2015 2016	 2014 2015 2016
00024128	Miller-Motte College	2016	338	729	372	 2014 2015 2016	 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00024664	Miller-Motte College	2016	265	587	260	 2014 2015 2016	 2014 2015 2016
00029110	Miller-Motte College	2016	566	1284	529	 2014 2015 2016	 2014 2015 2016
00037877	Miller-Motte College	2016	419	910	386	 2014 2015 2016	 2014 2015 2016
00010317	Miller-Motte Technical College	2016	321	632	293	 2014 2015 2016	 2014 2015 2016
00010911	Miller-Motte Technical College	2016	351	753	310	 2014 2015 2016	 2014 2015 2016
00019077	Miller-Motte Technical College	2016	487	971	454	 2014 2015 2016	 2014 2015 2016
00020286	Miller-Motte Technical College	2016	281	694	320	 2014 2015 2016	 2014 2015 2016
00021955	Miller-Motte Technical College	2016	260	555	208	 2014 2015 2016	 2014 2015 2016
00031484	Miller-Motte Technical College	2016	402	915	491	 2014 2015 2016	 2014 2015 2016
00035150	Miller-Motte Technical College	2016	576	1234	569	 2014 2015 2016	 2014 2015 2016
00042187	Miller-Motte Technical College	2016	386	783	352	 2014 2015 2016	 2014 2015 2016
00043616	Miller-Motte Technical College	2016	217	433	182	 2014 2015 2016	 2014 2015 2016
00046600	Miller-Motte Technical College	2017	332	699	382	 2015 2016 2017	 2015 2016 2017
00048170	Miller-Motte Technical College	2016	105	133	24	 2014 2015 2016	 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010512	Minneapolis Business College	2016	139	321	111	 91% 93% 92% 2014 2015 2016	 84% 86% 88% 2014 2015 2016
00262737	Minneapolis Media Institute	2016	93	199	73	 75% 2016	 62% 2016
00011103	Minnesota School of Business	2016	492	872	392	 70% 70% 74% 2014 2015 2016	 76% 79% 74% 2014 2015 2016
00011152	Minnesota School of Business	2015	92	199	57	 60% 2014 2015 2015	 73% 2014 2015 2015
00020409	Minnesota School of Business	2015	117	224	93	 71% 2014 2015 2015	 85% 2014 2015 2015
00021516	Minnesota School of Business	2016	103	223	80	 75% 67% 2014 2015 2016	 75% 65% 2014 2015 2016
00021959	Minnesota School of Business	2016	92	193	87	 73% 78% 2014 2015 2016	 79% 80% 2014 2015 2016
00022976	Minnesota School of Business - Blaine	2016	143	276	91	 73% 66% 2014 2015 2016	 78% 74% 2014 2015 2016
00024688	Minnesota School of Business - Elk River	2015	193	326	130	 78% 2014 2015 2015	 75% 2014 2015 2015
00024845	Minnesota School of Business - Lakeville	2015	122	268	109	 70% 2014 2015 2015	 79% 2014 2015 2015
00040730	Missouri College	2015	408	1000	461	 80% 2014 2015 2015	 76% 2014 2015 2015
00054467	MJS College School of Nursing and School of Business	2016	36	80	32	 51% 2016	 100% 2016
00011220	Mountain State College	2017	118	147	90	 66% 56% 81% 2015 2016 2017	 73% 56% 70% 2015 2016 2017
00019439	National Center For Credibility Assessment	2016	25	125	22	 94% 92% 90% 2014 2015 2016	 100% 100% 100% 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00010139	National College	2016	81	171	71	 57% 66% 66% 2014 2015 2016 73% 83% 70% 2014 2015 2016
00010683	National College	2016	85	202	96	 64% 64% 70% 2014 2015 2016 91% 81% 75% 2014 2015 2016
00020615	National College	2016	72	132	54	 65% 64% 2014 2015 2016 84% 73% 2014 2015 2016
00022603	National College	2016	159	358	158	 62% 66% 64% 2014 2015 2016 72% 73% 71% 2014 2015 2016
00023097	National College	2016	74	175	60	 60% 58% 2014 2015 2016 82% 71% 2014 2015 2016
00023525	National College	2016	101	235	119	 59% 70% 69% 2014 2015 2016 76% 62% 71% 2014 2015 2016
00011105	National Latino Education Institute	2016	58	112	50	 93% 93% 82% 2014 2015 2016 73% 76% 78% 2014 2015 2016
00020839	Neumont University	2016	297	568	271	 84% 88% 80% 2014 2015 2016 95% 95% 100% 2014 2015 2016
00011328	New York Institute of English and Business	2016	304	708	280	 66% 72% 2014 2015 2016 100% 0% 2014 2015 2016
00171290	Niels Brock Copenhagen Business College	2016	0	1612	253	 85% 80% 83% 2014 2015 2016 66% 56% 71% 2014 2015 2016
00230477	Nobel University	2016	284	368	186	 71% 2016 0% 2016
00240580	Nobel University - Buena Park	2016	131	157	116	 87% 2016 0% 2016
00031581	North American University	2016	558	936	594	 81% 88% 79% 2014 2015 2016 92% 83% 72% 2014 2015 2016
00135778	Northwest Suburban College	2016	34	68	26	 87% 2016 86% 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00015527	Northwestern Polytechnic University	2016	3126	7728	4683	 94% 97% 95%	 88% 89% 94%
00010662	Ohio Business College	2016	340	675	296	 74% 78% 70%	 91% 92% 83%
00011181	Ohio Business College	2016	242	470	224	 70% 69% 69%	 82% 80% 83%
00024651	Ohio Business College	2016	149	261	84	 73% 76%	 88% 93%
00146976	Ohio Medical Career College	2016	73	188	122	 90% 93%	 48% 70%
00011157	Ohio Valley College of Technology	2016	124	302	154	 79% 68% 82%	 89% 86% 85%
00024769	Oklahoma Technical College	2016	115	324	129	 75% 82% 83%	 90% 91% 78%
00010610	Omega Institute	2014	119	250	94	 73%	 56%
00022684	Oregon Culinary Institute	2016	202	486	216	 84% 83%	 87% 88%
00010681	Pace Institute	2014	94	141	9	 77%	 67%
00237211	Pacific Institute of Technology	2016	87	88	19	 100%	 61%
00012769	Pacific States University	2016	192	391	218	 86% 78% 85%	 78% 87% 80%
00031503	PC AGE Career Institute	2016	115	262	123	 81% 79% 82%	 70% 73% 73%
00031506	PC AGE Career Institute	2016	35	111	68	 75% 81% 80%	 87% 90% 83%

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00240224	PCCTI Healthcare	2016	100	295	182	<p>65% 75%</p> <p>2015 2016</p>	<p>73% 80%</p> <p>2015 2016</p>
00024852	Peloton College	2016	95	188	81	<p>79% 77% 68%</p> <p>2014 2015 2016</p>	<p>75% 67% 53%</p> <p>2014 2015 2016</p>
00275317	Peloton College	2016	0	0	0	<p>0%</p> <p>2016</p>	<p>0%</p> <p>2016</p>
00010315	Penn Commercial Business/Technical School	2016	193	463	177	<p>75% 72% 77%</p> <p>2014 2015 2016</p>	<p>81% 78% 73%</p> <p>2014 2015 2016</p>
00010523	Pennsylvania Institute of Health and Technology	2016	68	160	87	<p>85% 88% 89%</p> <p>2014 2015 2016</p>	<p>89% 81% 96%</p> <p>2014 2015 2016</p>
00022447	Pinchot University	2016	72	114	33	<p>95% 83%</p> <p>2014 2015 2016</p>	<p>83% 81%</p> <p>2014 2015 2016</p>
00010096	Pinnacle Career Institute	2016	71	156	51	<p>72% 75% 81%</p> <p>2014 2015 2016</p>	<p>57% 70% 73%</p> <p>2014 2015 2016</p>
00042957	Pinnacle Career Institute	2016	127	249	81	<p>47% 74% 75%</p> <p>2014 2015 2016</p>	<p>72% 67% 71%</p> <p>2014 2015 2016</p>
00042939	Pinnacle Career Institute - North Kansas City	2016	86	218	87	<p>75% 68% 75%</p> <p>2014 2015 2016</p>	<p>67% 68% 83%</p> <p>2014 2015 2016</p>
00108807	Pinnacle Career Institute - Online Education	2017	331	514	227	<p>52% 56% 71%</p> <p>2015 2016 2017</p>	<p>66% 61% 35%</p> <p>2015 2016 2017</p>
00012651	Pioneer Pacific College	2016	304	737	322	<p>76% 74%</p> <p>2014 2015 2016</p>	<p>80% 79%</p> <p>2014 2015 2016</p>
00020227	Pioneer Pacific College - Eugene Branch	2016	298	684	262	<p>74% 75%</p> <p>2014 2015 2016</p>	<p>77% 80%</p> <p>2014 2015 2016</p>
00025097	PITC Institute	2017	110	325	148	<p>73% 51% 62%</p> <p>2015 2016 2017</p>	<p>64% 68% 69%</p> <p>2015 2016 2017</p>
00070534	Pittsburgh Career Institute	2016	122	370	177	<p>68% 77% 66%</p> <p>2014 2015 2016</p>	<p>54% 79% 88%</p> <p>2014 2015 2016</p>

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00066575	PPG Technical College	2016	144	405	175	
00010759	Premiere Career College	2016	275	548	228	
00244988	Premiere International College	2016	4	16	15	
00058011	Prince Institute-Great Lakes	2016	23	23	9	
00011116	Prince Institute-Southeast	2016	40	40	13	
00254209	Process Work Institute	2016	15	31	29	
00011331	Professional Business College	2016	648	648	231	
00021541	Professional Golfers Career Academy	2014	50	92	39	
00012775	Professional Golfers Career College	2016	56	103	44	
00023518	Professional Golfers Career College-Hilton Head	2016	40	84	29	
00053102	Provo College	2016	321	643	258	
00033239	Radians College	2015	473	1034	713	
00134983	Radiological Technologies University VT	2016	67	103	78	
00011303	Ridley-Lowell Business & Technical Inst.	2016	108	216	106	

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00011332	Ridley-Lowell Business & Technical Institute	2016	96	175	51	 2014 2015 2016	 2014 2015 2016
00015747	Ridley-Lowell Business & Technical Institute	2016	174	423	158	 2014 2015 2016	 2014 2015 2016
00033448	Ridley-Lowell Business & Technical Institute	2016	73	180	66	 2014 2015 2016	 2014 2015 2016
00243134	Ridley-Lowell Business & Technical Institute	2016	148	161	49	 2014 2016	 2014 2016
00262833	Rockford Career College	2016	426	1411	589	 2016	 2016
00031682	SAE Institute Atlanta	2017	243	439	235	 2015 2016 2017	 2015 2016 2017
00028284	SAE Institute of Technology	2016	142	322	127	 2014 2015 2016	 2014 2015 2016
00032108	SAE Institute of Technology	2016	132	356	148	 2014 2015 2016	 2014 2015 2016
00108398	SAE Institute of Technology - San Francisco	2016	69	143	50	 2015 2016	 2015 2016
00244592	SAE Institute of Technology Chicago	2016	154	307	131	 2014 2016	 2014 2016
00245680	SAE Institute of Technology Db a SAE Institute of Technology (nashville) Corp.	2016	119	266	132	 2014 2016	 2014 2016
00245683	SAE Institute of Technology New York	2017	187	344	221	 2016 2017	 2016 2017
00011306	Sage College	2016	369	558	340	 2014 2016	 2014 2016
00023117	Sage College	2015	55	68	12	 2014 2015	 2014 2015

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend	
		Year	Beginning Population	Total Enrollment			Ending Population
00042959	Salter College	2016	75	260	97	 72% 2014 2016 60%	 75% 2014 2016 52%
00010357	Salter College: A Private Two-Year College, LLC	2016	275	503	168	 71% 2014 2015 2016 70%	 67% 2014 2015 2016 76%
00010498	Salter School	2016	133	217	27	 83% 2014 2015 2016 82%	 63% 2014 2015 2016 60%
00019993	Salter School	2016	207	638	240	 74% 2014 2015 2016 72%	 63% 2014 2015 2016 71%
00020809	Salter School	2017	96	170	80	 71% 2015 2016 2017 84%	 42% 2015 2016 2017 48%
00032544	Salter School of Nursing & Allied Health	2016	120	318	132	 81% 2014 2015 2016 83%	 73% 2014 2015 2016 72%
00048177	San Ignacio University	2016	65	238	176	 78% 2014 2015 2016 90%	 90% 2014 2015 2016 100%
00010192	Sanford-Brown College	2014	214	229	15	 88% 2014	 51% 2014
00010395	Sanford-Brown College	2014	236	276	30	 76% 2014	 52% 2014
00011161	Sanford-Brown College	2016	351	373	95	 76% 2014 2015 2016 76%	 61% 2014 2015 2016 52%
00015768	Sanford-Brown College	2015	239	541	219	 82% 2014 2015 81%	 81% 2014 2015 81%
00018936	Sanford-Brown College	2016	140	149	52	 71% 2014 2015 2016 78%	 67% 2014 2015 2016 73%
00020950	Sanford-Brown College	2015	321	704	218	 81% 2014 2015 81%	 71% 2014 2015 71%
00020954	Sanford-Brown College	2015	361	623	277	 85% 2014 2015 85%	 67% 2014 2015 67%

ACICS ID	Campus Name	Latest CAR Period				Retention Trend			Placement Trend					
		Year	Beginning Population	Total Enrollment	Ending Population									
00020956	Sanford-Brown College	2016	359	368	30	79%	82%	77%	66%	2014	2015	2016		
00020958	Sanford-Brown College	2014	334	543	101	76%		70%		2014				
00020968	Sanford-Brown College	2015	382	731	257	81%		76%		2014		2015		
00021012	Sanford-Brown College	2016	168	194	63	64%	56%	84%	70%	71%	60%	2014	2015	2016
00021569	Sanford-Brown College	2016	236	248	116	68%	70%	76%	62%	49%	58%	2014	2015	2016
00022159	Sanford-Brown College	2016	281	302	69	77%	71%	74%	71%	82%	67%	2014	2015	2016
00070523	Sanford-Brown College	2016	95	104	13	77%		76%	72%		79%	2014	2015	2016
00070526	Sanford-Brown College	2016	128	143	49	69%		69%	74%		69%	2014	2015	2016
00024743	Sanford-Brown College Online	2016	699	775	209	59%	54%	61%	66%	68%	61%	2014	2015	2016
00011132	Sanford-Brown College-Chicago	2016	136	148	44	69%		78%	73%		72%	2014	2015	2016
00015766	Sanford-Brown Institute	2015	405	721	244	85%			66%			2014		2015
00020960	Sanford-Brown Institute	2015	965	1816	582	76%			61%			2014		2015
00020964	Sanford-Brown Institute	2014	340	389	52	81%			71%			2014		
00020970	Sanford-Brown Institute	2016	393	408	28	86%		83%	71%		59%	2014	2015	2016

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00010360	Santa Barbara Business College	2016	74	103	48	
00010730	Santa Barbara Business College	2016	329	533	262	
00010731	Santa Barbara Business College	2016	175	251	108	
00020699	Santa Barbara Business College	2016	93	179	119	
00023802	Santa Barbara Business College	2016	200	345	164	
00024027	Santa Barbara Business College - Online	2016	166	313	155	
00010798	SBI Campus - An Affiliate of Sanford-Brown	2016	175	200	34	
00010639	Schiller International University	2016	102	243	149	
00010643	Schiller International University	2016	42	91	52	
00010644	Schiller International University	2016	66	134	80	
00010647	Schiller International University	2016	102	386	200	
00165332	Seattle Film Institute	2016	45	85	44	
00024346	Sentara College of Health Sciences	2016	322	585	411	
00170150	Shepherd University	2016	239	415	332	

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend	
		Year	Beginning Population	Total Enrollment			Ending Population
00010560	Sierra Valley College of Court Reporting	2016	83	103	57	 73% 2014 60% 2016	 85% 2014 80% 2016
00019408	Silicon Valley University	2016	1555	4292	3129	 86% 2014 97% 2015 94% 2016	 96% 2014 88% 2015 80% 2016
00024422	SOLEX College	2017	190	399	198	 88% 2015 76% 2016 86% 2017	 66% 2015 55% 2016 0% 2017
00010487	South Coast College	2016	305	443	265	 80% 2014 81% 2015 79% 2016	 73% 2014 82% 2015 90% 2016
00011203	South College-Asheville	2015	211	585	294	 75% 2014 2015	 78% 2014 2015
00010814	South Hills School of Business and Technology	2016	350	569	313	 81% 2014 80% 2015 86% 2016	 84% 2014 86% 2015 86% 2016
00019244	South Hills School of Business and Technology	2016	92	132	58	 79% 2014 77% 2015 85% 2016	 91% 2014 87% 2015 84% 2016
00026129	Southern California Health Institute (SOCHI)	2016	330	681	228	 87% 2014 77% 2015 82% 2016	 81% 2014 84% 2015 75% 2016
00023862	Southern States University	2016	93	220	173	 86% 2014 2016	 93% 2014 2016
00023864	Southern States University	2016	78	171	122	 82% 2014 82% 2015 88% 2016	 67% 2014 78% 2015 77% 2016
00010657	Southern Technical College	2016	571	1042	475	 70% 2014 69% 2015 70% 2016	 76% 2014 70% 2015 75% 2016
00018863	Southern Technical College	2016	263	557	298	 71% 2014 71% 2015 70% 2016	 74% 2014 80% 2015 79% 2016
00020720	Southern Technical College	2016	397	859	372	 71% 2014 68% 2015 69% 2016	 75% 2014 75% 2015 72% 2016
00024504	Southern Technical College	2016	203	441	218	 73% 2014 66% 2015 78% 2016	 76% 2014 71% 2015 76% 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00023740	Southern Technical College - Auburndale	2016	231	493	184	 2014 2015 2016	 2014 2015 2016
00024405	Southern Technical College - Mount Dora	2016	130	277	100	 2014 2015 2016	 2014 2015 2016
00040946	Southern Technical College, Brandon	2016	151	381	182	 2014 2015 2016	 2014 2015 2016
00024210	Southern Technical College-Sanford	2016	176	422	157	 2014 2015 2016	 2014 2015 2016
00010791	Spanish-American Institute	2016	316	662	320	 2014 2015 2016	 2014 2015 2016
00027075	Spartan College of Aeronautics and Technology	2016	251	480	194	 2014 2015 2016	 2014 2015 2016
00168008	Spartan College of Aeronautics and Technology	2016	107	190	72	 2014 2015 2016	 2014 2015 2016
00010506	Spencerian College	2016	414	774	352	 2014 2015 2016	 2014 2015 2016
00015661	Spencerian College	2016	84	141	58	 2014 2015 2016	 2014 2015 2016
00011980	Stautzenberger College	2016	590	1570	569	 2014 2015 2016	 2014 2015 2016
00022120	Stautzenberger College	2016	271	817	346	 2014 2015 2016	 2014 2015 2016
00021738	StenoTech Career Institute	2014	59	87	52	 2014	 2014
00010394	Stenotype Institute of Jacksonville	2015	184	238	134	 2014 2015	 2014 2015
00010552	Stevens - The Institute of Business and Arts	2016	109	220	96	 2014 2015 2016	 2014 2015 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010292	Stone Academy	2016	343	829	442	 2014 2015 2016	 2014 2015 2016
00011317	Stone Academy	2016	150	426	168	 2014 2015 2016	 2014 2015 2016
00023091	Stone Academy	2016	283	658	363	 2014 2015 2016	 2014 2015 2016
00019411	Stratford University	2016	1200	2832	1187	 2014 2015 2016	 2014 2015 2016
00019413	Stratford University	2016	490	919	438	 2014 2015 2016	 2014 2015 2016
00135520	Stratford University	2016	397	693	346	 2014 2016	 2014 2016
00239628	Stratford University - Alexandria Campus	2016	173	488	284	 2014 2016	 2014 2016
00039666	Stratford University - Glen Allen	2016	344	607	289	 2014 2015 2016	 2014 2015 2016
00029108	Stratford University - New Delhi	2016	386	529	362	 2014 2015 2016	 2014 2015 2016
00230405	Stratford University - Virginia Beach	2016	270	539	306	 2014 2016	 2014 2016
00108252	Stratford University Baltimore Campus	2016	467	878	425	 2014 2015 2016	 2014 2015 2016
00015803	Sullivan College of Technology and Design	2016	353	714	371	 2014 2015 2016	 2014 2015 2016
00010391	Sumner College	2016	247	442	282	 2014 2016	 2014 2016
00257970	Suncoast College of Health	2016	24	177	56	 2016	 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00011096	Taylor Business Institute	2016	455	837	366	<p>83% 83%</p> <p>2014 2016</p>	<p>62% 78%</p> <p>2014 2016</p>
00015907	Texas County Technical College	2016	43	95	42	<p>87% 92% 85%</p> <p>2014 2015 2016</p>	<p>97% 100% 97%</p> <p>2014 2015 2016</p>
00103319	Texas Health and Science University	2016	114	148	93	<p>92% 88% 92%</p> <p>2014 2015 2016</p>	<p>81% 79% 67%</p> <p>2014 2015 2016</p>
00243171	Texas Health and Science University- San Antonio Campus Addition	2016	0	28	24	<p>0%</p> <p>2016</p>	<p>0%</p> <p>2016</p>
00145506	The Art Institute of St. Louis	2016	323	548	228	<p>61% 59%</p> <p>2015 2016</p>	<p>69% 32%</p> <p>2015 2016</p>
00020240	The Art Institute of Tucson	2016	286	480	203	<p>61% 68% 61%</p> <p>2014 2015 2016</p>	<p>69% 71% 53%</p> <p>2014 2015 2016</p>
00102266	The Art Institute of Vancouver	2016	898	1783	864	<p>75% 75%</p> <p>2014 2016</p>	<p>75% 64%</p> <p>2014 2016</p>
00041675	The Art Institute of Wisconsin	2016	354	405	137	<p>54% 57% 55%</p> <p>2014 2015 2016</p>	<p>71% 79% 66%</p> <p>2014 2015 2016</p>
00032159	The Art Institute of York - Pennsylvania	2016	253	267	112	<p>78% 78% 82%</p> <p>2014 2015 2016</p>	<p>73% 61% 43%</p> <p>2014 2015 2016</p>
00010751	The Art Institutes International Minnesota	2016	568	1050	463	<p>66% 61% 65%</p> <p>2014 2015 2016</p>	<p>84% 76% 73%</p> <p>2014 2015 2016</p>
00053714	The Chef's Academy	2016	164	344	140	<p>66%</p> <p>2016</p>	<p>89%</p> <p>2016</p>
00031491	The Digital Animation & Visual Effects School	2016	176	321	146	<p>91% 83% 96%</p> <p>2014 2015 2016</p>	<p>83% 82% 65%</p> <p>2014 2015 2016</p>
00180233	The Recording Conservatory of Austin	2016	25	57	35	<p>88%</p> <p>2016</p>	<p>87%</p> <p>2016</p>
00028864	Tribeca Flashpoint College	2016	204	426	132	<p>83% 77% 61%</p> <p>2014 2015 2016</p>	<p>75% 78% 75%</p> <p>2014 2015 2016</p>

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00170656	Trillium College Kingston	2016	94	206	91	 80% 86% 87% 2014 2015 2016 68% 76% 77% 2014 2015 2016
00170657	Trillium College Ottawa	2015	45	148	89	 93% 2014 2015 47% 2014 2015
00010408	Trinity College of Puerto Rico	2016	210	377	166	 86% 74% 75% 2014 2015 2016 74% 71% 65% 2014 2015 2016
00010514	Trumbull Business College	2016	126	247	89	 66% 64% 2014 2015 2016 73% 76% 2014 2015 2016
00012392	Tucson College	2016	152	489	179	 86% 81% 2014 2015 2016 84% 58% 2014 2015 2016
00169624	Tyson's Institute	2016	17	72	48	 87% 2016 0% 2016
00248783	UAC School of Global Management	2016	20	52	41	 88% 2016 60% 2016
00238610	UEI College	2017	171	336	182	 77% 79% 2016 2017 64% 49% 2016 2017
00060614	Unilatina International College	2016	74	114	53	 94% 87% 2015 2016 100% 92% 2015 2016
00148277	Universal Technology College of Puerto Rico	2016	585	1102	452	 80% 80% 2015 2016 65% 63% 2015 2016
00148280	Universal Technology College of Puerto Rico	2016	122	272	111	 85% 80% 2015 2016 70% 76% 2015 2016
00047158	Universal Training Institute	2016	130	218	113	 76% 76% 81% 2014 2015 2016 83% 77% 78% 2014 2015 2016
00242565	Universal Vocational Institute	2016	14	42	18	 93% 2016 82% 2016
00233044	Universidad San Ignacio De Loyola S.A.	2016	1291	2039	1253	 75% 2016 59% 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00061155	Universidad San Ignacio Loyola	2016	16501	24296	17926	85% 2016	70% 2016
00023874	University of Antelope Valley	2015	649	1335	568	83% 2014 2015	76% 2014 2015
00228584	University of North America	2016	156	454	390	95% 2016	100% 2016
00010834	University of Southernmost Florida	2015	11	40	24	71% 2014 2015	69% 2014 2015
00180249	University of Southernmost Florida-Coral Gables Campus	2014	17	112	88	79% 2014	0% 2014
00012804	Valley College	2016	90	287	135	84% 85% 86% 2014 2015 2016	82% 81% 62% 2014 2015 2016
00108638	Valley College	2017	291	470	179	75% 75% 73% 2015 2016 2017	73% 54% 21% 2015 2016 2017
00108644	Valley College	2016	74	246	102	71% 72% 80% 2014 2015 2016	71% 86% 60% 2014 2015 2016
00010596	Vet Tech Institute of Houston	2016	183	386	182	74% 76% 82% 2014 2015 2016	92% 96% 96% 2014 2015 2016
00241563	Victory Trade School	2016	10	20	9	90% 2016	75% 2016
00010424	Virginia College	2017	508	765	380	68% 72% 69% 2015 2016 2017	71% 73% 42% 2015 2016 2017
00010582	Virginia College	2017	2411	3317	1786	64% 64% 69% 2015 2016 2017	73% 70% 41% 2015 2016 2017
00018779	Virginia College	2017	310	484	246	65% 68% 74% 2015 2016 2017	73% 64% 44% 2015 2016 2017
00019669	Virginia College	2017	281	420	226	73% 69% 80% 2015 2016 2017	83% 81% 45% 2015 2016 2017

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00019670	Virginia College	2017	487	818	468	
00019779	Virginia College	2017	602	776	451	
00022050	Virginia College	2017	306	454	248	
00023095	Virginia College	2017	327	448	251	
00023668	Virginia College	2017	471	732	395	
00023959	Virginia College	2017	315	463	275	
00024563	Virginia College	2017	623	929	530	
00024697	Virginia College	2017	849	1175	661	
00024833	Virginia College	2017	349	530	302	
00034181	Virginia College	2017	442	604	341	
00040822	Virginia College	2017	336	539	273	
00041407	Virginia College	2017	537	795	406	
00043122	Virginia College	2017	267	388	213	
00043594	Virginia College	2017	418	597	347	

ACICS ID	Campus Name	Latest CAR Period			Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment		
00045919	Virginia College	2017	459	693	397	 75% 71% 78% 2015 2016 2017 86% 89% 66% 2015 2016 2017
00062295	Virginia College	2017	646	898	516	 68% 69% 74% 2015 2016 2017 76% 75% 37% 2015 2016 2017
00073373	Virginia College	2017	16	23	13	 77% 69% 73% 2015 2016 2017 64% 94% 100% 2015 2016 2017
00108695	Virginia College	2017	479	656	352	 65% 71% 69% 2015 2016 2017 70% 74% 44% 2015 2016 2017
00141660	Virginia College	2017	448	693	406	 67% 72% 72% 2015 2016 2017 70% 77% 36% 2015 2016 2017
00145523	Virginia College	2017	320	429	252	 77% 76% 79% 2015 2016 2017 74% 70% 49% 2015 2016 2017
00165129	Virginia College	2017	348	500	265	 65% 71% 70% 2015 2016 2017 70% 71% 50% 2015 2016 2017
00173613	Virginia College	2017	319	433	232	 75% 72% 2015 2017 78% 44% 2015 2017
00221316	Virginia College	2017	318	468	272	 68% 72% 2015 2017 68% 38% 2015 2017
00023099	Virginia International University	2016	1032	1924	1020	 78% 78% 87% 2014 2015 2016 73% 67% 81% 2014 2015 2016
00048193	Virginia University of Oriental Medicine	2016	75	120	73	 86% 2016 6% 2016
00010480	West Tennessee Business College	2016	151	301	118	 76% 78% 73% 2014 2015 2016 82% 68% 76% 2014 2015 2016
00010484	West Virginia Business College	2016	46	89	39	 70% 62% 2014 2016 91% 78% 2014 2016
00010868	West Virginia Business College	2016	41	91	36	 70% 57% 2014 2016 75% 67% 2014 2016

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00010481	West Virginia Junior College	2016	107	260	134		
00010492	West Virginia Junior College	2016	322	736	378		
00019725	West Virginia Junior College	2016	143	306	139		
00016296	Westhill College	2015	87	137	56		
00011142	Westwood College - Los Angeles	2015	577	1062	427		
00021503	Westwood College Atlanta Northlake	2015	363	791	335		
00020658	Westwood College Chicago Loop	2015	368	762	325		
00011325	Westwood College DuPage	2015	171	257	93		
00011130	Westwood College O'Hare Airport	2015	319	589	283		
00018945	Westwood College River Oaks	2015	250	580	272		
00027067	Westwood College-Anaheim	2015	589	1029	416		
00027058	Westwood College-Annandale	2015	263	569	226		
00027060	Westwood College-Arlington Ballston	2015	356	753	315		
00021273	Westwood College-Atlanta	2015	384	833	384		

ACICS ID	Campus Name	Latest CAR Period				Retention Trend	Placement Trend
		Year	Beginning Population	Total Enrollment	Ending Population		
00027065	Westwood College-Aurora	2015	240	438	162	71% 2014 ----- 2015	66% 2014 ----- 2015
00027062	Westwood College-Denver North	2015	362	735	294	67% 2014 ----- 2015	74% 2014 ----- 2015
00027071	Westwood College-Inland Empire	2015	811	1432	587	78% 2014 ----- 2015	78% 2014 ----- 2015
00023709	Westwood College-Online	2015	1259	2241	753	60% 2014 ----- 2015	61% 2014 ----- 2015
00027056	Westwood College-South Bay	2015	447	810	335	75% 2014 ----- 2015	78% 2014 ----- 2015
00010873	Wright Career College	2015	203	498	251	61% 2014 ----- 2015	76% 2014 ----- 2015
00011180	Wright Career College	2015	292	622	329	63% 2014 ----- 2015	73% 2014 ----- 2015
00021276	Wright Career College	2015	263	586	292	62% 2014 ----- 2015	80% 2014 ----- 2015
00054199	Wright Career College	2015	314	637	308	----- 2015	----- 2015
00107783	Wright Career College	2015	169	395	183	62% 2014 ----- 2015	82% 2014 ----- 2015
00048390	Wright Graduate University for the Realization of Human Potential	2016	72	131	62	80% ----- 2016	92% ----- 2016
00010894	Yorktowne Business Institute	2014	125	212	130	71% ----- 2014	63% ----- 2014

Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-119



August 26, 2016

VIA E-MAIL AND UPS DELIVERY

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RALEIGH, NC

ID CODE 00023814(MC)

LIVING ARTS INSTITUTE @ SCHOOL OF COMMUNICATION ARTS,
WINSTON-SALEM, NC

ID CODE 00033024(BC)

Subject: Renewal of Accreditation Show-Cause Directive Letter

The Council reviewed your institution at its recent meeting, including the institution's application for renewal of accreditation, the reports for the on-site evaluation visits conducted in May 2016, and the institution's response to the visit reports. As a result of its review, the Council found the following based on the *Accreditation Criteria*:

1. The placement rate could not be verified in a number of programs at both the Winston-Salem and Raleigh campuses. The institution has not demonstrated a process of careful recordkeeping due to numerous inaccuracies and inconsistencies found during the on-site evaluation visits and numerous revisions made to the Campus Accountability Report (CAR) submitted in the institutional response as a result of these findings (Sections 3-1-303(a) and 3-1-203).
2. The campus does not maintain documentation indicating approval of the use of commendations in its advertising (Sections 3-1-703 and Appendix C).

Council Action

Due to the serious nature of the findings discovered during the institution's on-site evaluation visit and the inability of the institution to provide evidence to satisfactorily resolve these findings, the Council directed the institution to show-cause why its application for accreditation should not be denied or otherwise conditioned during the December 2016 review cycle. The

institution is required to review and follow the Council hearing procedures as detailed in Section 2-3-500 of the *Accreditation Criteria* and the “Schedule of Fees” listing on the ACICS website. The institution must provide the appropriate notification and fee within ten days of receipt of this notice.

In response to the show-cause directive, the institution must submit the following information by **November 1, 2016**:

1. Evidence that supports the placement of graduates as indicated on the 2015 Campus Accountability Report (CAR).

Winston-Salem campus

Evidence of placement verification and waiver documentation for those students identified in the team’s report and not addressed in the campus response, or incompletely addressed in the response as listed below:

Graduate/Program	Status on original CAR, not verified during the team visit	Status on CAR revised July 1, 2016
Ms. [REDACTED] Medical Assistant (MA)	Placed by title (Home Care Attendant)	Placed by skill: no further documentation provided
Ms. [REDACTED] MA	Placed by skill (not employed)	Placed by benefit: no further documentation provided
Ms. [REDACTED] MA	Placed by benefit (Medication Aid, benefit not confirmed by graduate)	Not available for placement due to continuing education: no further documentation provided
Ms. [REDACTED] Nwaokolo, MA	Placed by benefit (CNA)	Placed by benefit: attestation of benefit provided, but no supporting documentation to evidence benefit
Ms. [REDACTED] Hicks, MA	Placed by title (Administrative Coordinator at health services agency)	Placed by skill: attestation of benefit and resume provided, but no documentation to support skills utilized in position
Ms. [REDACTED] MA	Placed by title (CNA)	Placed by benefit: no further documentation provided

Graduate/Program	Status on original CAR, not verified during the team visit	Status on CAR revised July 1, 2016
Ms. [REDACTED] MA	Placed by skill (Habilitation Technician)	Placed by benefit: resume and exit interview provided, but no attestation and supporting document to evidence benefit
Ms. [REDACTED] MA	Placed by skill (Habilitation Technician)	Placed by benefit: resume and exit interview provided, but no attestation of benefit and supporting document to evidence benefit
Ms. [REDACTED] Massage Therapy (MT)	Placed by title (Front Desk Associate)	Placed by skill: attestation of benefit provided, but no documentation to support skills used in position
Ms. [REDACTED] MT	Not working (not reviewed during visit because of "not working" status")	Placed by title: e-mail dated 6/22/16 from employing company provided, but no date of employment given or other supporting documentation

The Council has serious concerns with the lack of accurate and substantive recordkeeping evidenced in the submission of the 2015 CAR and the response materials relating to placement classifications. The campus changed a number of placement classifications, including graduates who were placed by title or by skill into placed by benefit, and one graduate who was classified originally as not working into placed by title. These concerns are heightened by the fact that the campus, in its original submission of the 2015 CAR, had a stated placement rate of 59.6 percent.

The Council finds a serious lack of credibility with the institution's misclassification of the placed by benefit category, which should not and cannot be used as a way to circumvent placing a graduate who does not meet the placed by title or by skill classification. For example, the campus has a student who was placed as a Certified Nursing Assistant (CNA) following completion of their Medical Assistant program. The campus cannot determine that this student is placed unless there is specific evidence that the student needed this particular credential to receive employment in that position and the campus must provide such evidence in order to verify the accuracy of the placement classification. Documentation should include, but is not limited to, a signed letter of employment or job description from the employer that indicates evidence that that the training and credential received were necessary to obtain the job indicated.

The campus must submit another revised and corrected 2015 CAR, with the appropriate fee, which includes a detailed explanation on each of the revised classifications. The campus must include back-up documentation to substantiate the reclassification. If there is insufficient evidence to support the classification of these revised placements, then the campus must classify these students as not placed.

The campus must also provide a revised CEP that includes program improvement plans for any programs whose placement rates now fall below ACICS standards as a result of graduate reclassifications.

Raleigh campus

The campus revised its 2015 CAR to reclassify two graduates as not placed, since they were unable to gather evidence that supported their original classification of placed by skill. The campus must submit evidence that supports the placement by benefit of training for the Digital Audio Production and Design graduate, Mr. [REDACTED]. Documentation should include, but is not limited to, a job description or signed letter of employment from the employer. The campus may provide documentation from the graduate, indicating how the training received in the program was beneficial in obtaining or maintaining the job, only if it is also accompanied by documentation from the employer of the graduate obtaining the job and evidence that that the training and credential received were necessary to obtain or maintain the job indicated.

Third-Party Placement Verification

In addition, the institution (both campuses) must provide evidence that every placement listed on the 2015 CAR, as well as those listed on the 2016 CAR, have been validated through third-party verification. The institution must present a selection of three potential third-party verifiers to the Council within 10 days of receipt of the letter. ACICS will then select one of the third-party verifiers to serve in this role.

The institution must provide evidence of the contract with the third-party verifier as well as the completion of work done by this verifier. In addition to the standard verification report, the following information must also be submitted:

- The employer point of contact verifying placement if such contact is different from the data submitted to the third-party verifier by your institution.
- The date of employment if different from the date submitted to the third-party verifier by your institution.

- The placement category (by title, by skills or by benefit) if different from the category reported to the third-party verifier by your institution. If by title is found inadequate and by skills was found valid, the list of skills used to verify the placement must be recorded.
2. Evidence of prior written consent for those remaining videos on YouTube that contain commendations from graduates, including the “Living Arts College Alumni” videos and “Living Arts Institute: The Stories of Promise” video, or evidence that the campus has removed or amended such video clips. Documentation must include, but is not limited to, an e-mail, screenshot, or other documented record of a “Notice of take down” indicating the removal of the indicated video media.

Please submit eight hard copies of your response and one electronic copy via flash drive by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution’s accreditation.

Institutional Teach-Out Plan

Further, in compliance with Section 2-3-230 of the *Accreditation Criteria*, the institution is directed to submit an updated contingency teach-out plan that includes:

- a. A listing, by campus, of students with the student name; program of study; expected graduation date; and status of unearned tuition, status of refunds due, and current account balance for each student.
- b. A listing of comparable programs offered at other nearby institutions in the event that teach-out agreements or transfer arrangements are needed for students to complete their programs elsewhere.
- c. A custodian for all permanent academic records in case of closure that includes contact information for this individual or entity and the process by which students can obtain their records.
- d. A description of the financial resources available to ensure that students can complete their programs or receive refunds if the institution does cease operations.

The Council is obligated to take adverse action against any institution that fails to come into compliance with the *Accreditation Criteria* within established time frames without good cause. Please consult the Introduction of Title II, Chapter 3 for additional information.

Ms. Deborah Hooper
August 26, 2016
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If you have any questions about this action, please contact Ms. Katie Morrison at kmorrison@acics.org or (202) 336-6783.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
(aslrecordsmanager@ed.gov)
- Mr. Christopher Miller, U.S. Department of Education, School Participation Team,
Region IV (christopher.miller@ed.gov)
- Mr. Terrence Scarborough, University of North Carolina Board of Governors
(trscarborough@northcarolina.edu)
- Ms. Theresa Sisneros, Commission on Accreditation of Allied Health Programs
(theresa@caahep.org)



December 27, 2016

ID Code 00023814(MC)

VIA E-MAIL AND UPS DELIVERY

Ms. Debra Hooper
Vice President/Director
Living Arts College @ School of Communication Arts
3000 Wakefield Drive
Raleigh, NC 27614

acics.lac@living-arts-college.edu

Subject: Continued Renewal of Accreditation Show-Cause Directive

Dear Ms. Hooper:

LIVING ARTS COLLEGE @ SCHOOL OF COMMUNICATION
ARTS, RALEIGH, NC

ID CODE 00023814(MC)

LIVING ARTS INSTITUTE @ SCHOOL OF COMMUNICATION
ARTS, WINSTON-SALEM, NC

ID CODE 00033024(BC)

The Council considered your institution's application for a renewal of accreditation, the visit reports, the responses, and the testimony provided at the hearing held on December 8, 2016. The institution first appeared before the Council in August 2016 with a total of eight findings between its two campuses, one of which cast serious doubt on the integrity of the placement data reported to ACICS for the branch campus, resulting in a show-cause directive.

As a component of that directive, a third-party placement verification agency was utilized to validate all graduates classified as placed on the 2015 and 2016 Campus Accountability Reports (CAR) for both campuses. Further, the Council reviewed the student achievement outcomes reported on the 2016 CAR as part of its consideration of the show-cause directive.

As a result of its review, the Council found the following based on the *Accreditation Criteria*:

- The institution does not meet the Council's requirements for student achievement in regards to placement (Section 2-1-809). To address the original concern, the institution revised its 2015 CAR to reclassify those graduates whose placements were questioned. The results of the third-party verifier revealed some discrepancies in verification on the 2015 CARs but verified the validity of the data reported on the 2016 CARs sufficient to evidence the soundness of its reported placement data for that year.

However, the revisions to the 2015 CARs resulted in a decrease in placement rates (60 percent and 42 percent at Raleigh and Winston-Salem respectively). Further, the verified 2016 placement rates are 47 percent and 57 percent respectively.

The institution, in its written response and hearing testimony, highlighted unique initiatives (Project IMPACT) to improve the institution's placement system, but these plans have yet to be put in place as the institution is scheduled to train staff, faculty, and students on the project in early 2017.

These low rates over the last two years raise serious concern about the ability of the institution to prepare and assist its graduates with employment opportunities. Of particular note are the two programs that reported placement rates below 60 percent for three consecutive years.

Council Action

Therefore, the Council determined that the campus is not in compliance with the *Accreditation Criteria* and acted to direct the institution to continue to show-cause why its application for renewal of accreditation should not be denied or otherwise conditioned, at its April 2017 meeting. Further, because the institution's current grant of accreditation expires on December 31, 2016, the Council acted to extend the current grant of accreditation through April 30, 2017.

The institution must provide the appropriate notification and fee for an in-writing hearing within ten days of receipt of this notice in response to the continued show-cause. Failure to do so will be considered a deviation from the directives of ACICS and result in a withdrawal by suspension action in accordance with Section 2-3-402 of the *Accreditation Criteria*.

In response to the continue show-cause directive, the institution must submit the following information by **February 28, 2017**:

1. A corrective action plan that has been incorporated into the current Campus Effectiveness Plan (CEP) and includes specific activities that are being implemented to improve the programs that are negatively impacting the campus-level placement performance for each campus. The campuses must also submit a progress report, corresponding documentation, and any necessary explanatory narrative of all activities implemented and completed for the purpose of placement remediation between the campuses' renewal of accreditation visits in May 2016 and February 15, 2017.
2. A mid-year CAR that includes all student information between **July 1, 2016, and December 31, 2016**, along with documentation to support all reported placements, as reported on the Placement Verification Program (PVP) system and those graduates reported as not available for placement. At its April 2017 meeting, the Council will review the campuses' updated student achievement information and may take further action if the institution has not demonstrated improvement in its student achievement outcomes.

3. Evidence that all current and prospective students have been advised of the show-cause status. The following statement must be placed prominently on the institution's website:
 - o Notice to Living Arts College students and prospective students: Living Arts College @ School of Communication Arts has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), due to material noncompliance with placement standards: 47% (Living Arts College) as reported on the 2016 Campus Accountability Report.
 - o Notice to Living Arts Institute students and prospective students: Living Arts Institute @ School of Communication Arts has been placed on student achievement show-cause by their accreditor, the Accrediting Council for Independent Colleges and Schools ("ACICS"), due to material noncompliance with placement standards: 57% (Living Arts Institute) as reported on the 2016 Campus Accountability Report.

The response must be submitted via the citation documents section of the preexisting show-cause online application by the date indicated above. Failure to provide all information requested by the Council may result in the withdrawal of your institution's accreditation.

Student Achievement Outcomes – Placement Rates

As a result of its review, the Council took the following actions as a result of placement rates that are below standard for the following programs:

<u>Program Name</u>	<u>Credential</u>	<u>2014 Rate</u>	<u>2015 Rate</u>	<u>2016 Rate</u>
Animation & Game Design	Bachelor's degree	56%	30%	58%
Digital Filmmaking	Bachelor's degree	57%	45%	33%

Termination of Programs

In accordance with Section 2-2-503 of the Accreditation Criteria, the campus must cease any new enrollments in the listed programs on or before the due date for submission of the Program Termination applications, with immediate public notice to all interested parties, including, but not limited to, students, governmental agencies, the local community, and ACICS. **The campus must submit a Program Termination application through its Member Center account for each affected program within ten (10) days of receipt of this notification.** As part of the supporting documentation for the application, the campus must provide the following:

1. Evidence that all interested parties have been notified appropriately. Documentation must include copies of web posting, e-mail blasts, formal communication, catalog revisions, and updates to all advertising materials.

2. An audit of all students currently enrolled in the programs with an indication of expected date of completion/matriculation.
3. A plan to teach-out students in those programs that does not negatively impact their progress to complete the programs in the normal time frame. This plan must include documentation to demonstrate that the campus will continue to offer the educational services to these students, including courses and student and employment support services or provide formal agreements with comparable institutions to facilitate a transfer of these students.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council will be in writing only. Given that the programs have failed to meet standards for three consecutive years, consideration for the appeal will only be given with demonstrable improvements as reported in a mid-CAR (July 1, 2016 – December 31, 2016), with verifiable supporting placement (with waiver) information.

Institution Teach-Out Plan

Further, in compliance with Section 2-3-230 of the *Accreditation Criteria*, the institution must submit an institutional closure application for both campuses that includes an updated teach-out plan to ensure that students will receive an appropriate outcome, in the event of institutional closure.

ACICS directs the institution to produce formal teach-out agreements or transfer arrangements with those institutions that can provide a comparable program to the currently enrolled students. In addition, the institution must provide information that includes the following:

- a. A listing of students with the student name, program of study, expected graduation date, and institution at which the student will complete their program.
- b. A custodian for all permanent academic records that includes contact information for this individual or entity and the process by which students can obtain their records.
- c. A description of the financial resources available to ensure that students who are expected to graduate from their current campus can complete their programs or receive refunds.

Ms. Debra Hooper
December 27, 2016
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Please contact Ms. Katie Morrison at kmorrison@acics.org or (202) 336-6783 if you have any questions.

Sincerely,

(b)(6)

Roger J. Williams
Interim President

- c: Ms. Cathy Sheffield, Accreditation and State Liaison, U.S. Department of Education
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