

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-39

Michelle Edwards

From: Rudolph, Rhesa <Rhesa.Rudolph@fldoe.org>
Sent: Friday, October 13, 2017 1:07 PM
To: Michelle Edwards
Cc: Ferguson, Sam; Hood, Susan
Subject: ACICS Survey Monkey response/Florida
Attachments: Survey Monkey Doc.docx; ACICS Survey Monkey 10_13_17.docx

Follow Up Flag: Follow up
Flag Status: Flagged


Ms. Edwards, good afternoon. On behalf of Sam Ferguson, Executive Director for the Florida Commission for Independent Education, I am submitting responses to the survey received below from your agency. The survey, conducted through surveymonkey.com, asked for comments from various entities, including state regulators, as part of the systematic review of your standards. Our Commission prepared comments for #5 on the survey relating to evaluation of short-term programs. (see attached page from the survey). Because our comments were lengthier than the space allowed on the survey instrument, I have provided them in a separate document (see second attachment). If you could forward this information to the appropriate member(s) of your staff, we would appreciate it.

Thank you for the opportunity to provide input. My contact information is below if you have questions.

Rhesa Rudolph
Assistant Executive Director
Commission for Independent Education
325 W. Gaines St., Suite 1414
Tallahassee, FL 32399-0400
(850) 245-3236
www.fldoe.org/cie

From: ACICS [<mailto:andrea@acics.ccsend.com>] On Behalf Of ACICS
Sent: Thursday, October 05, 2017 1:27 PM
To: Smith, Joey <Joey.Smith@fldoe.org>
Subject: Call for Comment - Systematic Review

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 **Accrediting Council for Independent Colleges and Schools**

Good afternoon:

As relayed in the AWARE Webinar on September 25th, ACICS is soliciting input for policy suggestions and revisions as part of our systematic review. Your feedback is crucial as we work continuously to improve our standards for our

institutions and for our students. Please visit the survey via the link below to participate. We thank you in advance for your contribution to the strengthening of the ACICS policies, procedures, and standards.

<https://www.surveymonkey.com/r/SYSREV17>

ACICS, 750 First Street, NE, Suite 980, Washington, DC 20002

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Sent by areid@acics.org

5. ACICS is developing standards for the evaluation of short-term programs that have an occupational outcome (i.e. phlebotomy, home health aide) and would like to obtain additional feedback from the field regarding the following:

Measuring student achievement
program outcomes

Curriculum evaluation

Faculty qualifications

6. Would you be interested in serving any of the following ad hoc committees?

- Distance Education
- English as a Second Language
- Academic Review

If yes for any, please share your name, affiliation, and email address for follow up:

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ACICS Survey Monkey Responses – Item 5

Measuring student achievement program outcomes

Programs that prepare a student for an occupation or professional certification must conform to the standards and training practices generally acceptable by the occupational or professional fields for which students are being prepared. If the practice of the occupation or profession is regulated, licensed, or certified by a state or national agency, the institution must document to the Commission for Independent Education (Commission) that successful completion of the program will make the graduate eligible to take the licensing examination or to receive the appropriate certification or practice the profession unless the institution provides the disclosure required by rules of the Commission.

Qualified faculty must evaluate the competencies of students in each subject or course included in each curriculum, including independent study courses.

Each program must have clearly defined and published objectives and occupational performance outcomes, which must conform with accepted standards set by the Florida Department of Education or other appropriate recognized governmental or professional agencies. Institutions using occupational outcomes different from those set by recognized agencies must document their justification for using the outcomes selected.

Institutions must submit placement and retention information to the Commission.

An institution accredited by an agency recognized by the United States Department of Education must report its placement rate, as required by its respective accrediting agency, with each annual review. If the placement rate does not meet the accrediting agency's requirements, the Commission must place the institution on a placement improvement plan. This plan must be developed by the institution and include actions to be taken to improve the placement rate, and must be submitted to the Commission. A progress report must be filed with the Commission after a period designated by the Commission and must include information documenting the activities taken by the institution to improve the placement rate. If the progress report does not show improvement as accepted by the Commission, the Commission must take actions up to and including revocation of license.

An institution accredited by an agency recognized by United States Department of Education must report its retention rate, as required by its respective accrediting agency, with each annual review. If the retention rate does not meet the accrediting agency's requirements, the Commission must place the institution on a retention improvement plan. This plan must be developed by the institution and include actions to be taken to improve the retention rate, and must be submitted to the Commission. A progress report must be filed with the Commission after a period designated by the Commission and must include information documenting the activities taken by the institution to improve the retention rate. If the progress report does not show an improvement as accepted by the Commission, the Commission must take actions up to and including revocation of license.

Curriculum evaluation

It is the responsibility of the institution to demonstrate, upon request of the Commission, that the scope and sequence of a proposed or operating curriculum are consistent with appropriate criteria or standards in the subject matter involved, and of an appropriate level of difficulty for the program to be offered. The Commission must request assistance from other appropriate regulatory agencies or appoint committees to review curricula, when necessary to ensure that specialized programs contain the appropriate material to prepare students to enter those fields.

For each course to be offered, a syllabus or course outline, required equipment and supplies, and a list of competencies required for successful completion of the course must be developed by qualified faculty and be provided in writing for all students no later than the first meeting of each class. A copy of these documents must be kept in the institution's files and be made available for inspection by representatives of the Commission

Institutions offering programs 600 clock hours in length or longer must have a policy giving faculty a role in the development and continual reassessment of all curricula. The policy must be published in a faculty handbook, and must be implemented as published.

Educational programs of 600 clock hours in length or longer must be periodically reviewed by a committee of faculty, administrators, employers, and advisors drawn from relevant community and alumni groups, in an ongoing formalized process of evaluation and revision.

Faculty qualifications

The following standards apply to all full-time, part-time and adjunct faculty.

- Institutions whose graduates must pass state, federal or other licensing examinations before being licensed to practice their vocation, technology, trade or business must provide evidence that each instructor teaching in that field holds a current and valid Florida occupational license in the occupation being taught.
- For all non-degreeed faculty, the burden of proof is on the institution to demonstrate instructor competence in the subjects taught. Instructors must have completed postsecondary training in either a state licensed school or a college accredited by an accrediting agency recognized by the United States Department of Education plus one year of job experience related to the subjects taught; or have completed a minimum of three years of successful job experience directly related to the subjects taught.

Institutions must maintain evidence of the credentials that qualify faculty members to teach their assigned courses. All faculty files must include a resume or detailed application clearly reflecting the instructor's educational and work experience. In addition, official transcripts for all degrees held by all faculty members must be on file and available to the Commission upon request at each location and translated into English. Institutions must also maintain copies of other documents which reflect the instructor's qualifications to teach, such as copies of licenses and certifications.

Florida law requires faculty in licensed institutions to complete eight continuing hours of training related to their positions each year. Records of actual training must be available for inspection at the institution. Compliance with this requirement is a condition for renewal of licensure.