

4. The availability of financial resources available to ensure that students who are too advanced in their studies to transfer elsewhere from their current campus can complete their programs or receive refunds.

STEP THREE – FINAL CONSIDERATION AND ACTION

These considerations are incorporated into the Council's decision concerning the Show-cause directive or into ARIG's review. An appropriate communication is prepared and maintained in SharePoint for the record.

CHAPTER 8: CHANGE OF LOCATION APPLICATION

INTRODUCTION

Institutions are required at all times to keep the Council informed of any changes of address and changes of location. Change of location of a campus requires prior Council approval. The President has the authority to review and approve a change of location and may direct an onsite evaluation visit as part of the review. If the change of location results in disruption of transportation or forces students to relocate, the institution will also discuss and submit teach-out plans for the closing of a location (*Accreditation Criteria – Section 2-2-602. Change of Location*).

PROCEDURES

STEP ONE – SUBMISSION OF APPLICATION

To submit an application, the institution, or campus, logs into the ACICS Member Center and clicks beside *Modify or Add Location*; then uploads the requested documentation into the Change of Location Application and remits the required fee, as outlined in the *Schedule of Fees*.

STEP THREE –STAFF REVIEW

If all of the above components are not submitted, staff contacts the institution via e-mail for the missing elements, and the application is held until the missing documents have been received, **to not exceed two weeks after request. If the information is not received, the application will be withdrawn.**

On a weekly basis, staff must log into the Analyst Dashboard in the Member Center to check for new Change of Location Application submissions. Upon receipt, staff reviews the completed application and supporting documentation for compliance with the *Accreditation Criteria* and determines if the change is appropriate. If the requested change is found to be in compliance with the *Accreditation Criteria*, an approval letter is generated, turned into a PDF file, e-mailed to the institution, and copied to the U.S. Department of Education representative (included in the template), the appropriate U.S. Department of Education School Participation Team representative

(found in the most recent Directory of Higher Education Officials), and the appropriate state representative (found in the most recent Directory of Higher Education Officials).

Approval will not be granted unless all of the above elements are received. In cases where the state requires approval from the accrediting agency before it will grant approval or requires an on-site visit to the new location before granting approval, the institution must present evidence from the state in which accreditor approval is required before final approval can be granted.

Alternatively, an onsite review may be conducted in connection with the review of the application, prior to final approval.

STEP FOUR – DOCUMENT MANAGEMENT

Staff uploads the approval letter into the Change of Location application in the Member Center and changes the application status to Approved. All approval letters are saved to the Intranet, using the appropriate folder for the appropriate year using the institution's ID Code as the name for the file.

CHAPTER 9: CHANGE OF NAME APPLICATION

June 2017

INTRODUCTION

Change of an institution's name requires prior Council approval before the institution is allowed to promote or advertise its new name (*Accreditation Criteria – Section 2-2-601 - Change of Name*).

PROCEDURES

STEP ONE – SUBMISSION OF APPLICATION

To submit an application, the institution, or campus, logs into the ACICS Member Center and clicks beside *Modify* or *Add Location*. They then select the *Change of Name Application*, download and complete the application, upload the application and supporting documentation, and remits the required fee, as outlined in the *Schedule of Fees*.

STEP THREE – STAFF REVIEW

If all of the above components are not submitted, staff contacts the institution via e-mail for the missing elements and places the application on hold until the missing documents have been received.

On a weekly basis, staff must log into the Member Center Analyst Dashboard to check for new Change of Name Application submissions. Upon receipt, staff reviews the completed application and supporting documentation for compliance with the *Accreditation Criteria* and determines if the change is appropriate. If the requested change is found to be in compliance with the *Accreditation Criteria*, an approval letter is generated, turned into a PDF file, e-mailed to the institution, and copied to the U.S. Department of Education representative (included in the template), the appropriate U.S. Department of Education Case Management representative (found in the most recent Directory of Higher Education Officials), and the appropriate state representative (found in the most recent Directory of Higher Education Officials).

Approval will not be granted unless all of the above elements are received. In cases where the state requires approval from the accrediting agency before it will grant approval, the institution must present evidence from the state in which accreditor approval is required before final approval can be granted.

STEP FOUR – DOCUMENT MANAGEMENT

Staff uploads the approval letter into the Change of Name application in the Member Center and changes the application status to Approved. The approval letter is saved in the Intranet (SharePoint) in the folder for the appropriate year using the institution's id code as the name of the file.

CHAPTER 10: CHANGE OF OWNERSHIP APPLICATION

INTRODUCTION

The Change of Ownership Application is one of the most time-sensitive applications submitted to the Council. Because an institution's Title IV eligibility may be interrupted following a change of ownership, the new owners must have the Council's approval within 30 days of applying to the Department of Education for reinstatement of eligibility. These applications should be processed by ACICS within five business days so as to limit the potential loss of eligibility. The immediate outcome of this application is the temporary reinstatement of accreditation; permanent reinstatement only occurs after a Change of Ownership visit, receipt of audited financial statements, and finally Council approval. Temporary reinstatement will permit an institution to apply to the Department of Education for reinstatement of its Title IV eligibility.

The Change of Ownership Application is processed according to the standards set forth in Sections 2-2-400, 2-2-401, 2-2-402, and 2-2-403 of the *Accreditation Criteria*.

PROCEDURE

STEP ONE

An institution logs in to the Member Center, clicks to open a Change of Ownership Application, downloads the appropriate templates, uploads the required application form and documentation into the application, and remits the fees as outlined in the *Schedule of Fees*.

STEP TWO

The appropriate staff member confirms that the following items have been uploaded into the institution's Change of Ownership Application, to include all items identified as required in the application. When reviewing the documents, staff checks to be sure that the contract does not contain any contingencies about the reinstatement of accreditation. Any sale that is dependent on the new owners obtaining accreditation will not be approved.

Part I Submission Review:

1. State Authorization – *reach out to the state to confirm and discuss the proposed changes to hear any concerns. Following call, summarize key points in email to the state for the record.*
2. Organizational Chart and New Owner Stockholder Personnel Profile(s) – *review ACICS and public records concerning the following:*
 - a. *Debarment*
 - b. *Investigation by state, federal, or other entities*
 - c. *Criminal issues*
3. New Owner Most Recent Audit – *to be reviewed by the Financial Analyst*
 - a. *If new owners are individuals, ask for: copies of most recent tax returns, bank statements, and financial statements demonstrating financial health*
 - b. *If new owners are a NEW corporation with no history, ask for: copies of most recent tax returns, bank statements, and financial statements demonstrating financial health*

Following the review of **Part II Submission**, and subsequent review of any additional information received, staff prepares the institutional review file for FRC and the EC/Council, while awaiting Part II documents – due no later than 5 days of the transaction.

The **Date of Proposed Change in Ownership/Council** should be recorded on staff’s calendar as well as a reminder to look for Part II within 5 days of that DATE. Staff should follow up with the institution on day 4 if nothing has been received as the institution’s accreditation is automatically discontinued on the date of change and must be reinstated within 30 days.

Immediately following receipt of Part II, all materials, including any communication with the institution, state, and other parties, must be forwarded to the FRC for an electronic vote on the reinstatement of the institution’s accreditation following the change. FRC’s recommendation is taken to the Executive Committee or the Council for acceptance of the recommendation and final approval. Finally, staff submits a reinstatement of accreditation approval letter to the institution, copying all federal and state regulators, and files the approval letter within the application folder.

CHAPTER 11: COLLABORATION WITH STATE REGULATORY ENTITIES

INTRODUCTION

ACICS is committed to working closely with state higher education boards, post-secondary licensing agencies and other regulatory entities on issues, actions and information regarding ACICS-accredited institutions.

ACICS will respond promptly to information requests from state higher education or postsecondary education regulatory entities, including both routine and ad hoc requests. ACICS routinely invites state regulatory entities to observe or participate in evaluation visits to institutions in their respective states. ACICS will communicate with the appropriate state regulatory entity to inform and, if necessary, to confirm state approval, prior to considering any substantive and non-substantive change applications or monitoring reviews. ACICS will routinely notify state regulatory entities of all adverse actions taken by the Council regarding any of the institutions in their respective states.

PROCEDURES

STEP ONE – WHO WILL RESPOND

Any requests for information from state regulatory agencies will be promptly responded to by the office of the President or the Vice-President of Accreditation.

STEP TWO – COMMUNICATION TO STATE REGULATORY REPRESENTATIVE

Site visit coordinators routinely send a copy of the VS1 (Visit Confirmation Memo) to the state regulatory representative whose name and address appear on the Directory of Higher Education Officials. If an anticipated visit observation is confirmed, the visit coordinator will then send the state representative an official State Representative Observation Memo, which provides specific details about the purpose of the visit and visit itinerary.

CHAPTER 13: COMPLAINT AND EXTERNAL INFORMATION REVIEW

INTRODUCTION

Complaints are received from all sources with direct involvement with the campus, including current and former staff, faculty, and students (and their representatives) and are submitted anonymously and openly. External information includes all potentially adverse information received by third parties. All complaint and external information are processed according to the standards set forth in Sections 2-3-700 and 3-1-202(d) of the *Accreditation Criteria*.

PROCEDURE

STEP ONE – COMPLAINT OR ADVERSE RECEIVED

Complaint or adverse information received via telephone or hard-copy communication is routed to the Complaints and Adverse Review staff. However, a majority of complaints are received electronically through the online Complaints Module which is accessible via the web site at <http://www.acics.org/contact/content.aspx?id=1442>. They are also received via email to a member a staff. In the instances of paper, telephone, or email receipts, the complaint is advised, via email or telephone, to complete the online submission process in order to provide supporting documentation that can facilitate the review.

The record for external information is created by staff without follow up with the source and general triggers the investigation procedures of the At-Risk Institutions' Group (ARIG). Similarly, based on the nature of a hard-copy complaint, and the information available, staff will create the online complaint file without follow up with the source. Please review the ARIG Procedure section of this Chapter for additional details on the investigation of Adverse External Information.

External Information

Additional sources of adverse information include newspaper articles; television or radio reports; negative program reviews; findings in Inspector General Reports; U.S. Department of Education attempts to limit, suspend, or terminate an institution; negative actions by other accrediting bodies; actual or threatened revocation, suspension, or conditions by the state higher education authority.

Complaints

If the determination is made that the information is in the form of a complaint, staff will conduct a review of the complaint to make sure that it meets the following minimum requirements as described in the [*Procedures for Resolving Complaints*](#). In addition, the complaint must be detailed, accurate, and include documentation to support the complainant's allegations.

1. If the complaint does not include the necessary documentation to substantiate allegation or follow the procedures outlined, and no additional information was provided following a request, staff will prepare a letter advising that there is no evidence of violations of the *Accreditation Criteria*: The institution will **not** be sent a copy of the correspondence. These complaints are logged (with the "No Action" designation) in the electronic Complaints Portal, with a note by the reviewer on why the action was deemed appropriate.

2. If, based on staff's review, possible violation of the ACICS Criteria is identified, a request for information letter is prepared and sent to the campus in question; and a follow up is sent to the complainant (if contact information is known):
 - Letter informing complainant that the complaint has been sent to the institutions and a response has been requested.
 - Letter to the campus that includes a copy of the complaint (redacted if necessary) and with a request for specific information that aligns with the relevant Criteria. In some instances, the nature of the complaint may require a general request for information on how the campus has or will address the identified issues.

The campus may be given up to 21 calendar days to respond to the complaint, depending on the determined severity of the issues, and is expected to make reasonable efforts to resolve the problem directly with the complainant (as much as is possible)

STEP TWO– COMPLAINT RECORD

Any additional supporting documentation provided by the complainant is uploaded to the electronic complaint file, along with all correspondence sent and received by staff. A log of the open and closed complaint information is automatically maintained within the complaint portal.

STEP THREE – TRACKING

Staff checks the portal for response due dates. Additional correspondence is sent serving as a reminder to campuses that have not submitted their response and to also provide extension to the original due date, if requested. Late fees may be assessed to campuses who do not respond in a timely manner. Institutions who do not respond, after multiple requests may be subject to an ARIG-directed onsite review or directed to show-cause why their accreditation should not be suspended, revoked, or otherwise conditioned.

The visit would be facilitated by at least one staff and any other evaluators, based on the allegations originally under investigation and would be at the expense of the institution, with no notice, as provided for in Section 2-1-805 of the *Accreditation Criteria*.

If the recommendation is to issue a show-cause directive, staff will draft an outline as the reason for the directive along with any supporting materials to make the case, and a copy of the show-cause directive letter for the review and approval of the Executive Committee. This recommendation will be forwarded to the EC by the President.

STEP FOUR – STAFF REVIEW

Staff conducts a review of the response to determine if it adequately addresses the allegations made by the complainant(s).

1. INCOMPLETE or INSUFFICIENT RESPONSE

If the response failed to sufficiently address, with documentation, the allegations raised and/or provide a response to specific requests for information, an additional request for information correspondence is sent to the campus requesting the specific (listed by the coordinator) information needed to evaluate its compliance with ACICS standards. This information must be received no later than two weeks upon receipt and less time may be provided, if there is serious concern by staff. The complainant also receives communication that additional information has been requested from the institution.

- Letter to institution- more information requested
- Letter to complainant- more information requested of institution

2. COMPLETE RESPONSE

The response, which may be reviewed by senior staff or an external reviewer (IRC), will be evaluated to determine if the campus has demonstrated its compliance with the applicable standards, either through resolution or lack of culpability, or if there are outstanding issues requiring additional investigation.

- a. Routine Complaints. Frivolous, irrelevant or otherwise unsubstantiated complaints and complaints with responses that demonstrate the institution is in compliance with the *Accreditation Criteria* are dismissed.
 - Letter to complainant - complaint dismissed
 - Letter to institution – complaint dismissed
- b. Processing Settled Complaints. If the matter has been settled between the two parties, letters are prepared with specific details on the resolution.
 - Letter to complainant – complaint resolved
 - Letter to institution – complaint resolved
- c. Outstanding Issues. When there is ongoing concern with the campus’s compliance with the *Accreditation Criteria*, the matter will be presented to ARIG for its consideration and action.

All materials and communication related to the complaint are maintained in the Online Complaints Module, which are also accessible by the accreditation team and Commissioners.

STEP FIVE – COMMUNICATION TO COUNCIL

Complaint Chart and Review of Files

The Business Practices Committee (BPC) of the Council will be provided, at every meeting, a log and synopsis of all complaints and adverse (except financial). Financial adverse is presented as an information item by the staff liaison to the Financial Review Committee.

In those cases where an onsite visit has taken place as a result of a complaints investigation, with team's report and the campus's response will be assigned to a commissioner for file review, who also serves on the BPC (for Committee debriefing). From file review, a recommendation for the Full Council's consideration would include -

1. Campus/Institution has sufficiently addressed concerns and the complaint is closed. Council action letter would be an approval of the review.
2. Campus/institution failed to satisfactorily address the team's findings and placed on **compliance warning** since it is out of compliance at this point (at least one opportunity for response, an onsite review, and opportunity to respond to report).
3. The Council has serious concerns with the institution's/campus's ability to demonstrate compliance and determined that it is materially out of compliance with the Criteria, issuing a **show-cause directive**.

Institutional File Review

Commissioners, as part of the file review process, will review all open complaints and adverse information via the campus account on Member Center, for consideration of a final accreditation action.

AT-RISK INSTITUTIONS' GROUP (ARIG)

Purpose:

The expressed purpose of ARIG is to review the interim information/actions received concerning member institutions and determine an investigatory action that will take place. The goal is to provide the Council, at the [Business Practices Committee](#) meeting as well as to the [Executive Committee](#), with the necessary information by which to make an informed decision about a campus or institution.

Scope of Review:

The items which the group compiles information is gathered from complaints, adverse information, student achievement review, finance review, enrollment growth monitoring, and the most recent on-site 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).

Meetings:

The Group will meet **AS OFTEN AS NECESSARY** in order to stay current with institutional/campus concerns in case these concerns need to be relayed to the Executive Committee which convenes **ON A MONTHLY BASIS**. ARIG will also meet on an ad-hoc basis as new information is received that may be egregious and require immediate attention (particularly related to complaints and adverse information).

Process:

The Group members have been assigned due to their experience and daily responsibilities of handling one or more of the interim review items. Each member discusses each case within their purview and based on any additional actions and information provided about the institution (including accreditation and complaint history) and the ARIG report, 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 and Executive Committee can take actions against an institution).

Investigatory Actions:

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

- Handle the case through the specific interim review process by which it arose (i.e. the complaint process, adverse process, below standard performance rates, etc.).
- 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 (limited) 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 ARIG report until the case is effectively closed. All investigatory findings and reports will be reviewed per the quarterly 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.

CHAPTER 19: DISTANCE EDUCATION APPLICATION

INTRODUCTION

Institutions are required to apply and receive approval from the Council before offering any courses and/or programs via a distance education mode of delivery. Introduction of distance education mode of instructional delivery is considered a substantive change and requires prior Council approval (*Accreditation Criteria* – Section 2-2-106 – **Initiation of Distance Education**).

PROCEDURES

All institutions requesting to convert existing courses or programs to an online format for the first time at their institution must do the following:

STEP ONE – SUBMISSION OF APPLICATION

Institutions must log into their Member Center account to download and complete the application and required supplemental documentation. Institutions must remit the appropriate fee through their Member Center account using either a major credit card, or by submitting a check to the ACICS.

STEP TWO– REVIEW OF APPLICATION

Staff reviews the application(s) and verifies that the required information has been included; in particular, staff is verifying that each area outlined in Appendix H of the *Accreditation Criteria* has been adequately addressed. Council requires that the institution provide the following before online courses begin:

1. Faculty training and orientation
2. Student orientation
3. Description of plan to offer adequate interaction between students and faculty, student and student, and student and faculty.
4. Designation of a staff member who will coordinate online activities
5. Methods used to verify the identity of the student and publication of how the student's identity will be verified throughout the course and program.

6. Methods used to protect the students' privacy and disclosure of any fees associated with the verification process.
7. Online library or research resources are available to students for the courses offered.
8. Student services must be provided for programs taught 100% online.

STEP THREE– COMMUNICATION WITH SCHOOL

Once the new distance education application is reviewed, **one** of four options is followed:

1. If the application submitted contains errors or is incomplete, an e-mail detailing areas of non-compliance is sent to the member institution and the application is held in the office of the respective reviewer for two weeks. If the requested information is not provided by the institution within two weeks, the application is withdrawn.
2. If the application is complete, meets the standards, and the institution has been previously approved to offer distance education, staff drafts a letter of approval which is emailed directly to the application preparer with a copy to the campus administrator. Distance Education is then added on the campus's "Accreditation" tab in the Personify system.
3. If the application is complete, meets the standards, and the institution has not been previously approved to offer distance education, staff drafts a letter of approval which denotes the requirement for a quality assurance monitoring visit, that is emailed directly to the application preparer with a copy to the campus administrator. A visit by an appropriate subject matter specialist is also scheduled. Distance Education is then added on the campus's "Accreditation" tab in the Personify system.
4. If the reviewed application constitutes a method of delivery outside of the scope of the institution's accreditation, the application must be presented to the [Executive Committee](#) for their review.

STEP FOUR – APPROVAL OF DISTANCE EDUCATION ACTIVITY

After the institution has cleared any issues with regards to the application (if any), **and which must be done within two weeks following notice (or the application is withdrawn)** the institution will be approved to begin offering courses or program online. The approval letter will state when the first progress report is due and the proposed date of the initial evaluation visit. Staff

processing the application will make sure that all application and future visit dates are properly recorded.

STEP FIVE – ON-SITE EVALUATION VISIT, EVALUATION REPORT, AND INSTITUTIONAL RESPONSE

Distance Education Evaluation Visits are conducted approximately one year after the start of the first online courses. A staff member, with a distance education specialist, visits the institution to review the online activities. An evaluation report is written and sent to the institution consistent with the evaluation process.

Additionally, Distance Education activities are also reviewed during evaluation visits, i.e. renewal of accreditation or branch inclusion visits. All institutions are required to report distance education enrollment activities on the [Campus Accountability Report \(CAR\)](#) and incorporate its distance education activities into the Campus Effectiveness Plan (CEP).

CHAPTER 22: EXECUTIVE COMMITTEE

INTRODUCTION

As a standing committee of the Board of Directors, the Executive Committee (EC) has the authority to act on behalf of the Board and/or Council during the periods between the meetings. Its responsibilities include acting on issues requiring timely attention apart from the scheduled Board/Council meetings.

PROCEDURES

As determined by the Chair and the President, the EC will meet at least once a month, at a predetermined date, to consider any substantive changes requiring attention as well as other accreditation and ACICS-operational matters. The agenda for these meetings will be drafted by the President and any materials supporting the discussion items will be forwarded to the EC within a week of the meeting for the members' review and preparation. Minutes of the meeting will be taken by the President and accepted by the Committee Secretary for final approval and distribution.

While the EC has the authority to act on behalf of the Council, it will not take any final adverse action against an institution, an individual, or any entity. Instead, these actions will be deliberated upon by the full Council at its next meeting.

CHAPTER 23: EXTENSIVE SUBSTANTIVE CHANGES

INTRODUCTION

Extensive substantive change is defined as any substantive change to the educational mission, program, or programs of an institution that results in an institution that is significantly different from that which was last reviewed by the Council. The Council's concern, in reviewing and monitoring these changes, is that the institution does not adversely affect the capacity of the institution to continue to meet the agency's standards. (*Accreditation Criteria* - Section 2-2-102)

PROCEDURES

ACICS staff reviews all substantive changes made by member institutions. This review is conducted using a scale of 1-5 on any substantive change that has been made since its last renewal of accreditation visit and a cumulative score is calculated for all substantive changes. As appropriate, and based on staff's monitoring of changes at institutions, the Executive Committee will review the Substantive Change Matrix with recommended actions for member institutions that have made extensive substantive changes based on the cumulative score. A copy of this matrix, along with communication templates and the rubric, can be found in Share Point in the Substantive Change folder. The scores and corresponding recommended actions are as follows:

1. Total Points < 6 = No action
2. Total Points of 6 or 7 – Monitoring Status: the institution is advised of the process, its score, and being placed on monitoring.
3. Total points of 8 or 9 – Reporting Status: the institution is advised of its scoring and directed to prepare a written response concerning the changes it has made, the rationale for the changes, and the resources in place to manage them. This response would be reviewed by the Council at its next meeting for follow up and subsequent action.
4. Total points > 10 – Comprehensive On-site Evaluation Visit: Via formal communication, the institution is advised that its extensive substantive change as raised questions about the

institution it has become since its last renewal of accreditation visit, requiring a comprehensive visit to evaluate the institution's financial, administrative, and operational capabilities. The comprehensive on-site evaluation team consists of ACICS staff, a Chair, a Student Relations specialist and a subject specialist for all programs offered by the institution. A full team report is drafted to detail information reviewed during the visit and is reviewed by the Council as outlined in the [Council Institutional File Review](#) chapter.

The Committee has the discretion to act on staff recommendations or take other actions that it deems appropriate for each institution. Any institution that initiates any substantive change without proper application and approval from ACICS will immediately be issued a Show Cause Directive by the Council. Additionally, the Executive Committee considers an institution's cumulative substantive change score when reviewing any request to expand an institution's scope of accreditation, which may be denied if the Executive Committee determines that too many substantive changes have been made by the institution.

CHAPTER 24: FINANCIAL REPORTING

INTRODUCTION

Every institution that is accredited by ACICS must submit an Annual Financial Report (AFR) to the ACICS office within 180 days following the end of the fiscal year as defined in Section 2-1-802 of the Accreditation Criteria. These financial statements will be accompanied by audited financial reports prepared and certified by an independent certified public accountant (Section 2-1-803).

Because most ACICS accredited institutions participate in the Title IV financial aid program, and one of the requirements for continued participation is the completion of an annual audit, the Council receives a number of audits each year. Those institutions that do not participate in this program or do not prepare an audit for any reason over the course of a year are not required to submit anything other than an AFR. However, those schools that do not prepare audits on an annual basis must submit audited financial statements for their most recently completed fiscal year with any application for a new or initial grant of accreditation.

The institutions must submit this information in a timely manner. Failure to submit the information to the Council within the required timeframe could result in a delay in the calculation of sustaining fees. If an institution is late, staff writes the chief on-site administrator a letter serving as a reminder that Section 2-3-401(f) of the Accreditation Criteria indicates that revocation of an institution's grant of accreditation will occur if an "institution fails to file an annual report as required by the Council." A revocation action is not appealable and any institution that desires to renew its grant of accreditation must begin the process again as an initial applicant. In addition to the revocation reminder, a \$1000 late fee invoice accompanies the notice of late filing. Failure to pay this fee may also result in revocation. (*Accreditation Criteria, Sections 2-1-802, 2-1-803, and 2-3-401(g)*).

PROCEDURES

FINANCIAL REVIEW

All audits and AFRs are uploaded electronically through the institution's Member Center portal. The staff liaison for the Financial Review Committee is the accounting manager. These statements are reviewed by the accounting manager to determine if the information has been entered correctly in accordance with the audited financial statements provided, and if any of the financial information triggers indicators established by the FRC. If the financial position of the institution triggers an indicator the institution is placed on the "New Business Agenda" for the next Council meeting. The AFR is uploaded by the institution and stored electronically and audit statements are filed in the Electronic Document Management (EDM) system. When reviewing the income statement of the AFR, only the main campus' income statement (if the institution has more than one campus) is used to determine financial stability (institutions are also reviewed at the corporate level). Individual income statements are required to determine sustaining fees, but only the combined statements are used for FRC purposes.

The notes that accompany audited financial statements also are reviewed to explain any unusual information in the statements and determine if any other activity warrants the Council's attention. Examples of such transactions include the purchase or sale of the institution's stock, extensive inter-company loans or financial support, or unusually high accounts receivable in relation to revenue.

Occasionally, the auditor also performs an analysis of the institution's compliance with Title IV regulations relating to financial stability and refund procedures. If the auditor has significant concerns in either of these areas, the statement may be treated as adverse information and processed like any other complaint or concern submitted by a third party. Those institutions whose financial statements do raise concerns are filed in the EDM.

QUARTERLY FINANCIAL REPORTS AND FINANCIAL IMPROVEMENT PLANS

Quarterly Financial Reports (QFR) and Financial Improvement Plans (FIP) are handled in a similar manner to the AFR. All QFRs and FIPs are placed in the mailbox of the FRC liaison. He or she will then log the responses in, usually on the minutes from the last meeting. The reports are then

filed in the FRC file. It is essential that the FRC reports are filed in a timely manner to ensure that the committee will be able to review them at the next Council meeting.

SUSTAINING FEES

In addition to reviewing financial statements to determine the financial stability of the institution, the Council reviews these statements to calculate sustaining fees. An institution's sustaining fee is calculated based on the total amount of educational revenue they report in their campus- specific AFR for the fiscal year. A spreadsheet, located at M:\QUALITY ENHANCEMENT\ANNUALFINANCIALREPORTS\2010 AFR TRACKING lists each school ACICS accredits by fiscal year end and includes the amount of total educational revenue reported by each institution in the AFR. In the next phase of the internal tracking process, financial statements are reviewed and the revenue amount on the income statement is entered on this spreadsheet in order to verify the AFR's accuracy. If the AFR is not accurate, a school will be asked to review and revise it. Lastly, a column in the spreadsheet indicates the status of the audited financial statements' upload into the EDM.

CHAPTER 25: FINANCIAL REVIEW COMMITTEE

INTRODUCTION

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 quality education to their students. The Committee accomplishes its mission through the attainment of the following objectives:

- To continuously review and assess the FRC action indicators to verify that the Committee’s standards appropriately monitor the financial stability of accredited institutions.
- To review requests from institutions for waivers of the Council’s standards or the modification of existing criteria.
- To review and evaluate Change of Ownership Applications for the purpose of monitoring the ownership transactions of accredited institutions and understand the potential impacts of those transactions prior to approving the change of ownership.

Accreditation Criteria – Article V Committees, Section 1(d) Financial Review Committee.

PROCEDURE

An institution is placed on financial review if it has been required to submit either Quarterly Financial Reports, a Financial Improvement Plan, or if it has been directed to Show Cause why its grant of accreditation should not be suspended for failure to demonstrate financial stability. Once an institution is placed on financial review, there are specific criteria that must be met before the institution can be removed from review.

All financial statement information that is forwarded to FRC is reviewed and a determination is made to apply one of the following options:

- a. take no action or make specific inquiries for additional information;
- b. require the institution to submit Quarterly Financial Reports;
- c. require the preparation of a Financial Improvement Plan; or

- d. direct the institution to Show Cause why its grant of accreditation should not be withdrawn by way of suspension for failure to evidence financial stability.

NOTE: An institution may be deemed financially stable should it evidence a US Department of Education financial ratio composite score of a minimum 1.5:1. This score will be accepted from an audited financial statement prepared by an independent CPA firm.

LEVELS OF FINANCIAL REVIEW

Quarterly Financial Reporting

Institutions that are on quarterly financial reporting must submit Quarterly Financial Reports (QFR) as provided by ACICS within 30 days after the close of each fiscal quarter and an Annual Financial Report (AFR) as provided by ACICS no more than 180 days after the close of the institution's fiscal year. These reports are produced on a year-to-date basis.

As an example, assume that ABC College's fiscal year ends on December 31, 20xx and it has been placed on quarterly reporting. The institution must adhere to the following deadlines:

QFR #1:	3 months ending March 31, 20xx, by April 30, 20xx
QFR #2:	6 months ending June 30, 20xx, by July 30, 20xx
QFR #3:	9 months ending September 30, 20xx, by October 30, 20xx
QFR #4:	12 months ending December 31, 20xx, by January 30, 20xx
AFR:	12 months ending December 31, 20xx, by June 30, 20xx

Removal from QFR requires an audit that demonstrates financial stability. If the institution's financial situation worsens, it may be moved to a higher level of financial scrutiny.

Financial Improvement Plan

Institutions placed on a Financial Improvement Plan (FIP) must produce Financial Improvement worksheets on a quarterly basis, adhering to the same deadlines as QFR, for at least twelve consecutive months. Following the end of the next fiscal year, the AFR is submitted by the institution and reviewed by the Financial Analyst, who presents the information to the FRC at the next Council meeting. At that time, the FRC determines whether a new plan is necessary, whether

a different level of financial review is appropriate, or if the institution can be removed from financial review altogether. If an institution's financial situation worsens, it may receive a show-cause directive.

Financial Show Cause

If an institution's financial condition is seriously weakened, or if the institution has failed to respond to requests from the FRC for information, the institution may be directed to Show Cause why its grant of accreditation should not be suspended. When a Show-Cause directive is issued, the Council requires specific information about the institution's plans for resolving the financial instability and about the institution's ability to carry out those plans. Institutions that have been issued Financial Show-Cause directives may also be directed to produce a QFR and FIP for the most recent fiscal quarter, as well as a teach-out plan. The institution must also submit the most recently completed financial aid audit and a description of any actual or projected limitation on its ability to continue to participate in Title IV programs.

An institution placed on show-cause is not permitted to initiate new programs or to take any other substantive action without receiving approval in advance from the Council. The institution also is required to notify all present and prospective students of its show-cause status.

Continued Financial Show Cause

Once a financial show-cause directive has been issued, it is not unusual for the directive to be continued over the course of several FRC meetings. In such a case, the institution is required to submit compiled quarterly year-to-date financial reports for the most recently completed fiscal quarter and to update the information previously submitted to the FRC.

When an institution demonstrates significant financial improvement to the point where it appears that the institution's survival is not in jeopardy, the Show-Cause directive can be vacated. The institution remains on financial review at either the QFR or FIP level until it has demonstrated that it is once again financially stable.

Bankruptcy

Note: Institutions filing for Chapter 11 after July 23, 1992, are not considered “Institutions of Higher Education” for purposes of Title IV and immediately lose their eligibility to participate in Title IV programs.

Any institution that files for bankruptcy is issued a financial show-cause directive automatically, and the show-cause directive remains in effect until a confirmed bankruptcy plan is in place and the institution demonstrates fiscal stability. All institutions in Chapter 11 must submit QFRs and FIPs on a quarterly basis.

Suspension

The FRC has adopted a policy that an institution under a Show-Cause directive for financial instability reasons may have its accreditation suspended by the Council unless all of the following requirements are satisfied:

1. Current educational and administrative operations are not adversely affected;
2. Significant actions have been taken to reduce costs without impacting educational and administrative operations;
3. A detailed teach-out plan has been developed and is ready for immediate implementation, if necessary;
4. Requests for financial information from the Council have been responded to in a timely and satisfactory manner; and
5. The institution’s financial condition (current ratio, net profit or loss, equity) is improving.

When these conditions have not been met, the Council determines whether the institution’s grant of accreditation should be suspended. A suspension action is appealable to the Review Board.

Two Council staff members will serve as liaisons to the Committee to support meeting its objectives. The primary liaison’s responsibilities include interacting with the Committee Chair, facilitating the items for discussion and the Committee’s consideration, and ensuring that all policy changes and institutional reviews are ready for the Committee. The secondary liaison serves as the

Committee scribe, preparing the meeting agenda, recording minutes, and ensuring that the final minutes have been reviewed by the primary liaison and approved by the Chair prior to the full Council's discussion and acceptance. The secondary liaison is also responsible for ensuring that the final draft minutes and any materials handed out during the meeting are stored in the ACICS Intranet.

In preparation for the meeting, the draft agenda, policy outlines, reports, and supporting documents are saved here in the intranet: [Council](#) > [Documents](#) > [POLICY](#) > [FRC](#) (appropriate year and meeting folder).

Upon completion of the meeting and once the minutes have been drafted, they should be saved here: [Council](#) > [Documents](#) > [MEETING](#) > [MINUTES](#) (appropriate year and folder).

Addendum 1

FINANCIAL REVIEW COMMITTEE ACTION INDICATORS

The Financial Analyst reviews all Annual Financial Reports (AFR) for the following action indicators:

- a. a net loss of more than 5.0%
- b. a current ratio of less than 1:1
- c. accumulated deficit*
- d. negative equity/net assets

***Note:** The FRC does not consider accumulated deficit to be an action indicator unless the institution is also unprofitable.

If a financial report contains any action indicator, it is placed on the FRC New Business agenda of the next Council meeting. The Financial Analyst also reviews financial statements for any unusual or unacceptable reporting practices and includes this information on the next FRC agenda.

The Financial Analyst prepares spreadsheets which include all institutions on quarterly reporting for the FRC to review. The spreadsheets are sorted by category of review; utilizing the Point

System (see below), each institution is reported with its point values, along with the corresponding recommendations. This process eliminates much of the subjectivity that could enter into an evaluation of financial statements and places institutions that are between two levels of recommended action in the “seam” for additional consideration. The goal of the Point System is to ensure consistent evaluation of the financial statements of accredited institutions and to manage the FRC’s time efficiently.

FRC POINT SYSTEM

The FRC utilizes a point system based on the action indicators to assess financial health. The point system is as follows:

LOSS

< 5%	0
> 5% but less than 20%	1
> 20% but less than 50%	3
> 50%	6*

CURRENT RATIO

> 1.00:1	0
> 0.80:1 but less than 1:1	1
> 0.50:1 but less than 0.80:1	3
< 0.50:1	6*

RETAINED EARNINGS**

Positive	0
Negative	1

EQUITY AS A PERCENTAGE OF TOTAL ASSETS

Positive	0
Negative < 25%	3
Negative > 25%	6*

***NOTE:** An institution exhibiting a six-point action indicator in any category may be issued a show-cause directive even if its cumulative points do not reach the show-cause level as outlined below.

****NOTE:** An institution that has an accumulated deficit but that shows a profit for the period in question and has no other action indicators will be considered to have 0 points.

Once the point values have been assigned, the action recommended to the FRC is determined as follows based on the point totals:

0 points:No Action

- 1 points:FRC to decide - can be QFR or No Action*
- 2-3 points:Quarterly Financial Reporting*
- 4 points:FRC to decide - can be QFR or FIP*
- 5-6 points:Financial Improvement Plan*
- 7-8 points:FRC to decide - can be FIP or show cause*
- 9+ points:Financial Show Cause*

CHAPTER 29: INSTITUTIONAL COHORT DEFAULT RATES (CDR)

INTRODUCTION

Cohort Default Rate is defined as the percentage of an institution's student borrowers who enter repayment on certain Federal Family Education Loan (FFEL) Program and/or Direct Loan Program during a particular federal fiscal year (Oct. 1-Sept. 30) and default before the end of the next fiscal year. For student loans authorized under Title IV of the Higher Education Act, default occurs when a student fails to make payments on his/her loan for 240 days if the student is paying in monthly installments. The default rate is calculated by dividing the number of borrowers who entered repayment in a given fiscal year (denominator) into the number of borrowers who entered repayment and defaulted during the corresponding cohort period (numerator). For example, a school's cohort default rate for fiscal year 2007 is the percentage of students whose loans entered repayment from October 1, 2006, to September 30, 2007, and defaulted between October 1, 2006, and September 30, 2008.

The Department releases official cohort default rates once per year. Normally in late October the fiscal year (two years prior) default rates are made public. During the official cohort default rate process, schools are given the opportunity to appeal their cohort default rate(s) with the Department. The Department may take administrative actions against a school on the basis of its official cohort default rate(s) once all appeals are resolved.

The U.S. Department of Education administers the following student loans:

- (1) Federal Family Education Loans (FFEL), which include Federal Stafford and Federal PLUS loans
- (2) Direct Loans. Federal Stafford and PLUS loans are also offered through the William D. Ford Direct Loan Program
- (3) Federal Perkins Loans

The Department will subject schools to initial loss of eligibility to participate in the Pell Grant Program, FFEL Program, and/or Direct Loan Program when the school's three most recent official cohort default rates are equal to or greater than 25% *unless* the school successfully appeals.

The Department will subject schools to extended loss of eligibility to participate in the FFEL Program and/or Direct Loan Programs when a school lost FFEL Program and/or Direct Loan Program eligibility prior to the release of the current official cohort default rate due to three consecutive cohort default rates equal to or greater than 25%.

An institution with a cohort default rate in excess of 40% for one year may be subject to limitation, suspension, or termination (LS&T) from all Title IV student financial aid programs.

(Accreditation Criteria - 2-1-810. Student Loan Cohort Default Rates)

PROCEDURE

ACICS monitors its member institutions with cohort default rates equal to or greater than 28%.

- Institutions with a cohort default rate (CDR) equal to or greater than 28% for one year will be notified of the monitoring of their rates and advised that a plan should be developed.
- Institutions with a CDR greater than or equal to 30% for one year are required to submit a Default Rate Improvement Plan (DRIP).
- Institutions with a CDR greater than or equal to 30% for two or more consecutive years will be required to show cause why its accreditation should not be withdrawn by suspension and provide an institutional closure plan.
- Institutions with a CDR greater than or equal to 40% for one year will be required to show cause why its accreditation should not be withdrawn by suspension and provide an institutional closure plan.

The Council's Financial Review Committee may take any of the additional following actions:

- Direct the institution to submit a default rate improvement plan or request additional information for further review
- Direct an on-site evaluation visit to the institution to assess the institution's overall

compliance with the *Accreditation Criteria*. This could be either an unannounced visit or a special visit

- Issue a show-cause directive based on the information received from the institution and/or,
- Institutions with a high default rate may not be extended a grant of accreditation for any longer than four years.

STEP 1: COMPILE AND MAINTAIN LIST OF COHORT DEFAULT RATES

The Analyst for Financial Reporting will compile and maintain an up-to-date listing of cohort default rates for ACICS-accredited main campus institutions. This list, which includes the three most recently published CDR's, is used as an internal document for the benefit of ACICS staff. It is updated annually.

STEP 2: PREPARATION OF CORRESPONDENCE TO COUNCIL

The analyst will prepare correspondence according to Council guidelines as follows:

- Institution's default rate is over 30% for one year
- Institution's default rates are over 30% for two years
- Institution's default rate exceeds 30% for three years
- Institution's default rate above 40%

STEP 3: REVIEW BY FRC

The FRC reviews the list of CDR rates and staff recommendations for action and makes a determination as to which sanctions to apply. The coordinator is authorized to approve and sign all correspondence pertaining to cohort default rates for ACICS-accredited institutions.

STEP 4: DOCUMENT MANAGEMENT

The analyst will forward the correspondence as appropriate and ensure that it is filed in the institution or campus file as well as in SharePoint. Follow-up correspondence is created, forwarded and filed as required.

CHAPTER 30: INSTITUTIONAL EFFECTIVENESS COMMITTEE

INTRODUCTION

The mission of the Institutional Effectiveness Committee (IEC) is to assist institutions in the improvement of their outcomes by establishing and assessing criteria for institutional effectiveness. In order to assist ACICS-accredited institutions in meeting established standards, the IEC shall review Campus Accountability Reports, Campus Effectiveness Plans, and institutional outcomes and measurements (*Accreditation Criteria – Article V Committees, Section 1(e) Institutional Effectiveness Committee*).

PROCEDURE

The IEC will achieve its mission through the accomplishment of the following objectives:

1. To continuously review and assess student achievement (retention, placement, and licensure pass rate (where applicable)) results of the ACICS member institutions to ensure that all institutions comply with the Council’s minimum standards.
2. To continuously review and evaluate the Campus Accountability Report reporting procedures.
3. To provide oversight of the validity, reliability, and usefulness of the data collected from the Campus Accountability Reports.
4. To provide ACICS member institutions with publications, workshops, and other services to assist with retention and placement issues and to improve educational processes.
5. To provide ACICS member institutions with the knowledge and tools necessary to develop and implement successful retention and placement plans.
6. To establish and review accreditation standards related to institutional effectiveness.
7. To provide guidance, sponsor educational programs, and produce appropriate publications to help member institutions meet the criteria for institutional effectiveness.

8. To review and approve/disapprove requests by member institutions to initiate new activities or programs at campuses which are not compliant with ACICS retention or placement standards.
9. To recommend Council actions for member institutions that are not compliant with ACICS retention, placement, and/or licensure pass rate (where applicable) standards.
10. To review and assess enrollment data to determine whether there has been significant growth at the campus-level.
11. To review and assess enrollment data to determine if there has been more than 50% growth at institutions that offer coursework via distance education.

Two Council staff members will serve as liaisons to the Committee to support meeting its objectives. The primary liaison's responsibilities include interacting with the Committee Chair, facilitating the items for discussion and the Committee's consideration, and ensuring that all policy changes and institutional reviews are ready for the Committee. The secondary liaison serves as the Committee scribe, preparing the meeting agenda, recording minutes, and ensuring that the final minutes have been reviewed by the primary liaison and approved by the Chair prior to the full Council's discussion and acceptance. The secondary liaison is also responsible for ensuring that the final draft minutes and any materials handed out during the meeting are stored in the ACICS Intranet.

In preparation for the meeting, the draft agenda, policy outlines, reports, and supporting documents are on ACICS' intranet: [Council](#) > [Documents](#) > [POLICY](#) > [IEC](#) (appropriate year and meeting folder). Upon completion of the meeting and once the minutes have been drafted, they should be also be saved on the intranet: [Council](#) > [Documents](#) > [MEETING](#) > [MINUTES](#) (appropriate year and folder).

CHAPTER 33: LEARNING SITE APPLICATION

The Learning Site Application is used for smaller, non-independent locations and it is a shorter, less comprehensive application than the Branch Application. The application consists of questions about the location, the activities that will take place, state compliance, and management by a main or branch campus. A learning site cannot be its own independent location; the application should indicate that a main or branch campus has oversight and is responsible for the overall management of the site (*Accreditation Criteria* – Sections 1-3-103; 2-2-104; and 2-2-110).

PROCEDURES

STEP ONE – SUBMISSION OF APPLICATION

To submit an application, the institution, or campus, logs into the ACICS Member Center and clicks beside *Modify or Add Locations*. They then select *Add a Location*, complete the application and supporting documentation, and remit the appropriate fee. Learning sites can offer either courses or full programs, be either permanent or temporary, and must be within 5 miles of the oversight campus. 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. Institutions may also convert current branches to learning sites.

In addition to meeting the requirements listed above, an institution requesting approval to initiate any non-main campus activity cannot (1) be on financial review; (2) have a net loss on their most recent financial statements; (3) be on reporting with the Institutional Effectiveness Committee (IEC); or (4) currently on deferral and submit an application without first obtaining prior permission from the Council. Section 2-2-104 of the *Accreditation Criteria* also indicates that any institution “under a show-cause directive, a negative action, or in a probation status will not receive

approval for the initiation of any nonmain campus activity while the action is in effect.” Documentation required includes the application, evidence of state approval, inventory of equipment, faculty staff summary, and a narrative explaining the rationale for the proposed learning site.

STEP TWO –STAFF REVIEW

If all of the above components are not submitted, staff contacts the institution via e-mail for the missing elements and places the application on hold until the missing documents have been received. **The request for information will be given a two-week time period for submission or the application will be withdrawn. This must be communicated to the campus at the time of request.** In cases where the state requires approval from the accrediting agency before it will grant approval, the institution must present evidence from the state in which accreditor approval is required before final approval can be granted. On a weekly basis, staff must log into the Member Center Analyst Dashboard to check for new Learning Site Application submissions.

Section 2-2-104(b) of the Accreditation Criteria also indicates that any institution “...under a show-cause directive or a negative action will not receive approval from ACICS for the initiation of any such campus activity while the action is in effect.”

Therefore, the Program Analyst, as part of the review, will access the institution’s account via Member Center and review the **Council Action** section of the dashboard to confirm that none of the conditioning actions above are in effect. In the event that the institution needs to obtain prior approval, an email communication will be sent to the primary contact to explain the waiver submission process (by the Senior Manager).

Upon receipt, staff reviews the completed application and supporting documentation for compliance with the *Accreditation Criteria* and determines if the change is appropriate. If the requested change is found to be in compliance with the *Accreditation Criteria* and less than 50% of an approved program will be offered, an approval letter, is generated, turned into a PDF file, e-mailed to the institution, with copies to the U.S. Department of Education representative (included in the template), the appropriate U.S. Department of Education Case Management representative

(found in the most recent Directory of Higher Education Officials), and the appropriate state representative (found in the most recent Directory of Higher Education Officials).

If more than 50% of a program will be offered at the learning site, this will be considered a substantive change requiring the review of the [Substantive Change Committee](#). The committee will take into account the outcomes of the managing campus as well as the programs proposed to be offered at the site, the distance from the managing campus, and other factors consistent with its review of substantive change already detailed in that Chapter.

STEP THREE – DOCUMENT MANAGEMENT

The approval letter is saved in, U:\COUNCIL\Non-Main Campuses Approvals (Branch, Learning Sites), in the folder for the appropriate year using the institution's id code as the name of the file.

Staff uploads the approval letter into the Learning Site Application in the Member Center and changes the application status to Visit Required.

STEP FOUR – VISIT SET-UP

Staff logs into the database (Personify), finds the application task flow in the *Application Approval Management* module (previously mentioned), grabs and completes the first task (“Review Learning Site Application”). Staff should also add the appropriate tasks for learning sites that need a verification visit (*SCHEDULE- Schedule Learning Site Verification Visit; PRODUCT- Create Visit Invoice; and GENERAL- Record Council Action*); Staff then goes into *Visit Management* and assigns a cycle to the Learning Site Verification Visit (if applicable).

STEP FIVE– LEARNING SITE ANNUAL REPORT

Approximately one year after approval, the oversight campus must submit an Annual Report, an assessment of activities taking place at the site. Staff reviews the report and sends an acknowledgement to the school.

CHAPTER 34: MONITORING SIGNIFICANT ENROLLMENT GROWTH

INTRODUCTION

Significant enrollment growth at institutions is monitored annually with the submission of data in the [Campus Accountability Report](#). ACICS defines significant enrollment growth at the institutional level in two ways:

1. Growth of 100% or greater in enrollment at institutions within the reporting period covered by the CAR, July 1 through June 30. Because a small institution may experience rapid growth that does not represent a large number of additional students, an exception is made for institutions whose beginning enrollment is less than 200 students and where enrollment does not exceed 400 students by the end of the reporting period.
2. Growth of 50% or greater in enrollment at institutions where distance education coursework is offered within the reporting period covered by the CAR, July 1 through June 30.

PROCEDURES

Data Collection – Headcount enrollment data is collected and analyzed within two to four weeks of the data submission. The operational definitions and formulas used to calculate headcount enrollment are described in the CAR Guidelines and Instructions.

Monitoring Enrollment Growth – Institutions that report either type of enrollment growth as defined above are considered by the [Institutional Effectiveness Committee](#) for monitoring and reporting action. Staff will provide to the Committee an institutional profile - accreditation history, whether the campus is new, number of new programs, enrollment growth in specific programs, and modes of delivery. The Committee reviews the profile to determine why the institution is experiencing such rapid growth and then reviews information on all risk factors - financial reporting status, student achievement outcomes, cohort default rates, as well as any complaints or adverse information, to determine the impact that growth has had, if any, on financial stability as well as the quality of education provided to the students.

Monitoring/Reporting Actions - If the Committee determines that the rapid rate of growth at an institution is negatively affecting either financial stability or the quality of education, the following actions may be taken:

- Enrollment Growth Monitoring – Formal communication is sent to the institution requiring a response for the Committee’s review at the next meeting. The response will request information on the following areas:
 - Graduate and employer satisfaction by program
 - Key resource indicators including faculty-student ratios
 - Student services staffing levels and related operating budget ratios
 - Any reports required by the failure of the institution’s student outcome metrics to meet Council expectations

- Direct a Special Quality Monitoring visit – to evaluate the institution’s capacity and operations as they relate to the large enrollment. The visit will also focus on academic quality, instructional depth and student satisfaction.

- Issue a Show-Cause Directive

Information requested, report of the visit conducted with the institution’s response, or documentation for the show-cause review will be considered by a member of the IEC at the Council’s next meeting. If the institution is able demonstrate that it able to successfully manage its growth, then the Council may take action to remove the institution from Enrollment Growth Monitoring or continue monitoring through the next CAR submission. Ongoing concerns with growth may result in additional Council actions consistent with the review processes.

Information that an institution is subject to enrollment growth reporting requirements is taken into consideration by the Council if that institution applies for approval for any new programs or campuses or for distance delivery of additional programs.

Parallel with the Council’s review of the institution, if the institution offers coursework via distance education, correspondence will be forwarded to Secretary of Education within 30 days of

the Council's review of the data. This information will not be shared with the institution but the Department will also be copied on all communication to the institution if an action is taken, as described above.

CHAPTER 35: NEW PROGRAM APPLICATION

INTRODUCTION

An institution wishing to initiate a new program must seek and receive Council approval prior to advertising and admitting students into the program. This is considered a substantive change. All new program applications are processed according to the standards set forth in the *Accreditation Criteria*, including Sections 2-2-500, 2-2-501, 2-2-502, and 2-2-503 - **Programs of Study**.

PROCEDURES

STEP ONE– SUBMISSION OF APPLICATION

Institutions must log into their Member Center account complete and submit the New Program Application using either a major credit card, or by submitting a check to the ACICS, to remit the appropriate fee. In cases where a check is being sent, it may be necessary to work with the Accounting department.

STEP TWO– STAFF REVIEW

A Program Analyst reviews the application to ensure that:

- a. The application includes the appropriate state approval.
- b. The application meets Education Requirements at the credential level which apply (*Accreditation Criteria* Title III, Chapter Two, for non-degree programs, Title III, Chapter Three, for occupational associate's degree programs, Title III, Chapter Four, for academic associate's degree programs, Title III, Chapter Five, for bachelor's degree programs, Title III, Chapter Six, for master's degree programs.
- c. All contact/credit hours are distributed, converted, and totaled accurately in the Academic Credit Analysis.
- d. Courses are scheduled with appropriate prerequisites.
- e. Proposed syllabi for the new program meet the Council's standards (Glossary definition).

STEP THREE– COMMUNICATION WITH SCHOOL

Once the new program is reviewed, **one** of three options is followed:

1. If the application submitted contains errors or is incomplete, an e-mail detailing areas of non-compliance is sent to the member institution and the application is held in the office of the respective reviewer for two weeks. **If the requested information is not provided by the institution within two weeks, the application is withdrawn.**
2. If a program is complete, meets the standards of the *Accreditation Criteria*, and is within the institution's current scope of accreditation, staff drafts a letter of approval which is emailed directly to the application preparer with a copy to the campus administrator. Staff will add the new program to the institution's "Accredited Programs" tab in the Personify system and change the status of the program from "pending" to "active".
3. If the reviewed program constitutes a program outside the scope of the institution's mission and currently approved programs, the program must be presented to the [Executive Committee](#) for consideration for an expansion of the institution's scope of accreditation. If the expansion of scope is approved by the Committee, the institution is sent a letter acknowledging the approval, and addition to the Accredited Programs tab in Personify. The institution is sent an approval letter for the new program and a visit by an appropriate subject matter specialist is scheduled. This visit is scheduled for one year from the anticipated start date of the program. The institution's visit is then added to the "Visit Management" in the Personify system, where it will be assigned to the appropriate travel cycle.
4. If a program is to be at a higher credential level than any program currently approved within the institution (main and branch locations), the program must be presented to the Executive Committee for consideration for an expansion of the institution's scope of accreditation. If the expansion of scope of accreditation is approved, a readiness visit must be scheduled and the communication and visit set up procedures followed.

CHAPTER 37: NON-CREDIT, SHORT TERM COURSE PROGRAM APPLICATION

INTRODUCTION

In light of the changes to the Federal 90/10 rule in 2009, ACICS developed a new application, the Non-Credit, Short Term Module (NCST), for those institutions that wish to generate revenue from cash-based modules and/or courses.

PROCEDURES

STEP ONE – SUBMISSION OF APPLICATION

To submit an application, the institution, or campus, logs into the ACICS Member Center and clicks beside *Non-Credit Short Term Program Course*. They then select the campus, complete the application and supporting documentation, and remit the appropriate application fee.

If the intent is to offer the module or course at a learning site of a campus, the application must be submitted by the oversight campus (since the learning site does not exist independently). If the module /course will be offered at both the main oversight campus and a learning site, only one application needs to be completed. Documentation required includes the application, module details, draft announcement or promotional materials, and state approval, if applicable. Some states do not acknowledge such modules, others only require notification and some actually approves the module. It is the institution's responsibility to obtain and submit the appropriate document or notice from the state.

STEP TWO – STAFF REVIEW

If all of the above components are not submitted or additional information is needed, staff contacts the campus via e-mail for the missing elements and places the application on hold until the missing documents have been received, which must be within **two weeks of communication**. **If the requested information is not received within that time, the application will be withdrawn.**

On a weekly basis, staff must log into the Member Center Analyst Dashboard to check for new Non-Credit Short Term Application submissions.

Upon receipt, staff reviews the completed application and supporting documentation for compliance with the *Accreditation Criteria* and determines if the change is appropriate. If the requested change is found to be in compliance with the *Accreditation Criteria*, an approval letter, U:\COUNCIL\Programs\Non-Credit Short Courses, is generated, turned into a PDF file and e-mailed to the campus. If the President determines that courses are in fact programs, the campus may be directed to submit new program applications.

STEP THREE – DOCUMENT MANAGEMENT AND APPLICATION COMPLETION

The approval letter is saved in the folder for the appropriate year, in SharePoint, using the campus's ACICS ID Code as the name of the file.

Staff uploads the approval letter into the Non-Credit Short Term Module Application in the Member Center and changes the application status to Approved.

CHAPTER 38: NON-SUBSTANTIVE PROGRAM MODIFICATIONS

INTRODUCTION

Institutions wishing to make non-substantive changes to approved programs must notify the Council prior to the implementation of these changes. (*Accreditation Criteria* - Section 2-2-151). These changes must be communicated via the submission of an application.

PROCEDURES

STEP ONE–SUBMISSION OF APPLICATION

Institutions must log into their Member Center account to download and complete the application and remit the appropriate application fee.

STEP TWO– STAFF REVIEW

A Program Analyst will conduct a review of the Non-Substantive Program Modification Application.

The Non-Substantive Program Modification Application must meet criteria at the credential level for which the program applies (*Accreditation Criteria* Title III, Chapter Two, for non-degree programs, Title III, Chapter Three, for occupational associate’s degree programs, Title III, Chapter Four, for academic associate’s degree programs, Title III, Chapter Five, for bachelor’s degree programs, or Title III, Chapter Six, for master’s degree programs):

1. All contact/credit hours are converted, distributed and totaled accurately, as indicated on the academic credit analysis;
2. The revisions submitted do not equal or exceed 25% of the total existing contact hours, credit awarded, curriculum content (courses offered), or program length; and
3. The revisions do not constitute a change in the program objective or institutional mission.

STEP THREE– STAFF COMMUNICATES WITH INSTITUTION

Once the Non-Substantive Program Modification Application is reviewed, one of two options is followed:

- a. If the application submitted contains errors or is incomplete, an email detailing areas of non-compliance is sent to the member institution requesting revisions to the application and/or the supplemental documentation. **If the requested information is not received within two weeks of communication, the application will be withdrawn.**
- b. If the program modification is complete and meets the standards of the *Accreditation Criteria*, the application is processed and the acknowledgement letter is signed and dated by the Program Analyst with an indication of the type and percentage of change. A letter of acknowledgement is emailed to the institution, and the institution's "Accredited Programs" tab in Personify is updated to reflect the non-substantive change to the respective program.

CHAPTER 39: PLACEMENT VERIFICATION PROGRAM (PVP)

INTRODUCTION

ACICS launched its internal Placement Verification Program (PVP) on July 1, 2016, for the monthly submission, verification, and validation of placements for all campuses. Campuses cannot report, on the Annual institutional [CAR](#) report any placements that have not been validated by ACICS. Hence, it is critical that the procedures outlined below are followed systematically to strengthen the integrity of the data and establish a record of review for the Council's consideration of Student Achievement (Placement) actions. (*Accreditation Criteria* - Section 3-1-203).

PROCEDURE

Campus Submission Procedures

Pertinent PVP process information is provided to the campuses once they log into the system. Any change to the process or any enhancements would be recorded in these materials accordingly as well as being published in the Memo to the Field *For Information Only* Section and further discussed in the AWARE webinars. Campuses are able to submit placements individually, once confirmed, or a group for the month's submission. Once submitted, the system automatically sends an email to the employer and graduate, two weeks later if not verified, and two weeks after that (that is, there are three attempts by the system to obtain a verification).

Campuses are also able to update email addresses (and other placement information) to improve verification response rates and monitor the response and validation activity through their account. Further, campuses are able to contest placements deemed to be invalid by ACICS.

Contesting a Placement Determination

- Click on the  button to start the process
- The following window will open

Contest Result



If a placement has been deemed invalid by ACICS, the institution may contest the decision by submitting supporting documentation to the PVP review panel. The panel will complete a one-time review and their decision will be final. Documentation should include the following:

Title classification: evidence that the title identified is aligned with the program of study and may be unique to a field, employer, etc.

For a placement by skills: written evidence to demonstrate that the graduate is utilizing a predominant number (majority) of skills they obtained from their program, on a regular basis, in the position. Documentation should consist of program descriptions/course listings, and a position description from the employer or attestation(s) from the graduate and/or employer identifying the skills utilized in the position.

For a placement by benefit: written evidence that the graduate received a promotion, pay raise, or that the completion of the program enabled them to keep their current position. Documentation should include an attestation written by the employer/student identifying the benefit gained; comparative pay stubs which shows an increase; change in employment status or position (from coordinator to supervisor, etc.)

**Note: Submissions are only for placements that have been verified but marked invalid. Questions regarding placements that have not been verified should be submitted to verification@acics.org.*

Notes to PVP Review Panel:

Attach up to 3 files:

File 1: BROWSE

File 2: BROWSE

File 3: BROWSE

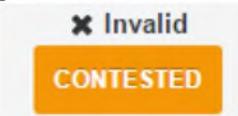
SUBMIT DATA

CLOSE

- Enter the narrative you would like the review panel to consider in the notes field
- Click on the browse button to upload any supporting documentation
- Click on the submit data button to send the request to the review panel for consideration

✘ Invalid

CONTESTED

- The “ACICS Verified” cell will look like this  if the request was successfully submitted

- If the PVP Review Panel rules in your favor, the “ACICS Verified” cell will look like



this

- If the PVP Review Panel does not rule in your favor, the “ACICS Verified” cell will



look like this

ACICS Administrative Review Procedures

PVP analysts and other assigned staff, after logging into the system at www.acicspvp.com/admin, will have access to a number of tools on the left hand bar, one of which allows for the review of **Monthly Placement** submissions. The following screen will be seen with filtering available to review a specific campus and/or a specific month of submission:

ACICS ID	Institution	Placement Month	Date Updated	Number of Placements	Email Responded	ACICS Verified	Response Rate	N Verified	View
0002097	Senior College & Private Two-Year College	September 2017	September 14, 9:23 PM	3	0	0	0%	0%	Q
0002492	Bradford Hall Career Institute	September 2017	September 11, 9:02 PM	3	1	1	67%	67%	Q
0002847	Harris School of Business	September 2017	September 11, 9:00 PM	4	1	1	50%	50%	Q
0003823	Bradford Hall Career Institute	September 2017	September 11, 9:07 PM	1	0	0	0%	0%	Q
0003207	Dewey University - Carolina Campus	Not Submitted Yet		0	0	0	0%	0%	
0003772	Bradford Hall Career Institute	September 2017	September 11, 9:04 PM	2	0	0	0%	0%	Q
0003702	Bradford Hall Career Institute	September 2017	September 11, 9:04 PM	4	1	2	50%	50%	Q
0003077	Walla Walla Technical College	September 2017	September 14, 9:41 PM	3	4	0	75%	43%	Q
0003700	Bradford Hall Career Institute	September 2017	September 12, 9:23 PM	2	2	1	67%	67%	Q
0003793	Yeshiva School	September 2017	September 14, 9:22 PM	11	2	0	36%	27%	Q
0002289	Bradford Hall Career Institute	September 2017	September 12, 9:23 PM	1	0	0	0%	0%	Q
0002218	Harris School of Business	September 2017	September 14, 9:18 PM	3	1	1	40%	60%	Q
0002330	Harris School of Business	September 2017	September 6, 9:30 PM	2	1	0	50%	50%	Q
0003294	Senior School of Nursing & Allied Health	September 2017	September 12, 9:19 PM	3	1	2	50%	50%	Q
0004471	Harris School of Business	September 2017	September 14, 9:21 PM	4	1	0	25%	0%	Q
0007040	Armstrong College For Health Careers	September 2017	September 12, 9:18 PM	4	0	0	0%	0%	Q
0007029	Bradford Hall Career Institute	September 2017	September 11, 9:00 PM	3	1	0	33%	33%	Q
0002879	Inter American Defense College	September 2017	September 14, 9:17 PM	47	19	17	61%	91%	Q

Clicking on the View magnifying glass, the analyst is able to conduct the validation of the placements that have been verified by the graduate and/or the employer. Placements that have not been verified would not be reviewed **except in cases where the reported placements have already been deemed unacceptable by ACICS** (additional information provided further in this document).

To review a placement, the analyst would click on the magnifying glass to open the screen below:

Placement Data - Verification by Title

CALL SCRIPT **CALL COMMENTS**

Hi, Natalia Rivera my name is Heather Waters Gilliam
I am with ACICS, the accrediting agency of Sutter College & Private Two Year College, LLC.

Did you receive an email from us recently?
YES - continue NO - see script, we must have an email address.

Do you have 5 minutes to answer a few questions?
YES - continue NO - see a later script call or email you after tomorrow's call?

Sutter College & Private Two Year College, LLC indicated that you graduated from their Medical Assisting program and that you are employed at St. Joseph's Health. Is this correct?
YES - continue NO - see your employment for this program?

Sutter College & Private Two Year College, LLC shows your title as Medical Assistant 31 9092. Is this correct?
YES - continue NO - would you show your title and we can compare the record? Thank you.

ACICS COMMENTS AND FILES

ACICS Internal Comments

External Comments

File Attachments

Upon reviewing the placement, if the placement is appropriate and verified, the analyst would mark the record as “Verified by Email”. When the verification is done via telephone, the record would be marked as “Verified by Contact”. If the placement does not meet the necessary criteria as stated below, then the analyst would comment as to why the placement is invalid and click the “Mark Invalid” button.

It is critical that a detailed comment is made for the record and to inform the campus of the reasons behind the action (to educate and modify any unwanted behavior).

In order to ensure consistency in the review process, when cases arise that question the validity of the placement, the analyst may request assistance from a member of the leadership team by selecting “Need Assistance” in the verification window:

Administrators would then access the Need Assistance section of the system to review the concern and comments and provide feedback to the analyst about the validity of the placement. It is critical that the manager provides details on why the placement is or is not acceptable to provide guidance to the analyst and to help craft the External Comment seen by the campus:

Graduates and employers are able to request a phone call in lieu of responding to the email verification. These are viewable via the **Call Request** section of the portal and are automatically entered into a calendar for the Analyst. These phone calls are generally in lieu of using the email

- There is no evidence that role is utilizing predominant amount of skills obtained from their program. Some examples may include:
 - Medical assistant - phlebotomist, mental health tech; donor tech, home aide, etc.
 - Nurse – Certified Nursing Assistant (CNA)
 - Criminal Justice - security guard/officer
 - Cosmetology/Esthetician – Mary Kay, salon receptionist
 - Culinary – fast food cook
 - EMT/Paramedic – driver

Additionally, placements will be rejected when:

- The position is not sustainable (temporary, only lasted a few days).
- The graduate and employer contradict each other.
- The graduate and/or employer update the title or skill and there is no match.
- The graduate or employer does not verify the placement before the closing of that CAR period.

Contested Placement Review

Contested placements are reviewed by the Panel to determine whether the documentation provided addressed the original concern when the placement was rejected and/or demonstrated the appropriateness of the placement that was missed during the verification process. Via the **Contested Placement** section, the reviewer will see the contested listing which can be sorted by a number of fields including date of contest, institution, program, and placement date.

As part of its review, the Panel will consider the following:

- The documentation included a position description from the employer that clearly outlines a predominant use of skills from the program.
- The documentation includes signed employer/graduate attestation of employment in instances where the party may have clicked the “not correct” in error.

However, the following will NOT be accepted:

- Verbal verification (on campus forms) from the graduate/employer

- Third-party verification forms
- Institutional verification forms or graduate/employer surveys

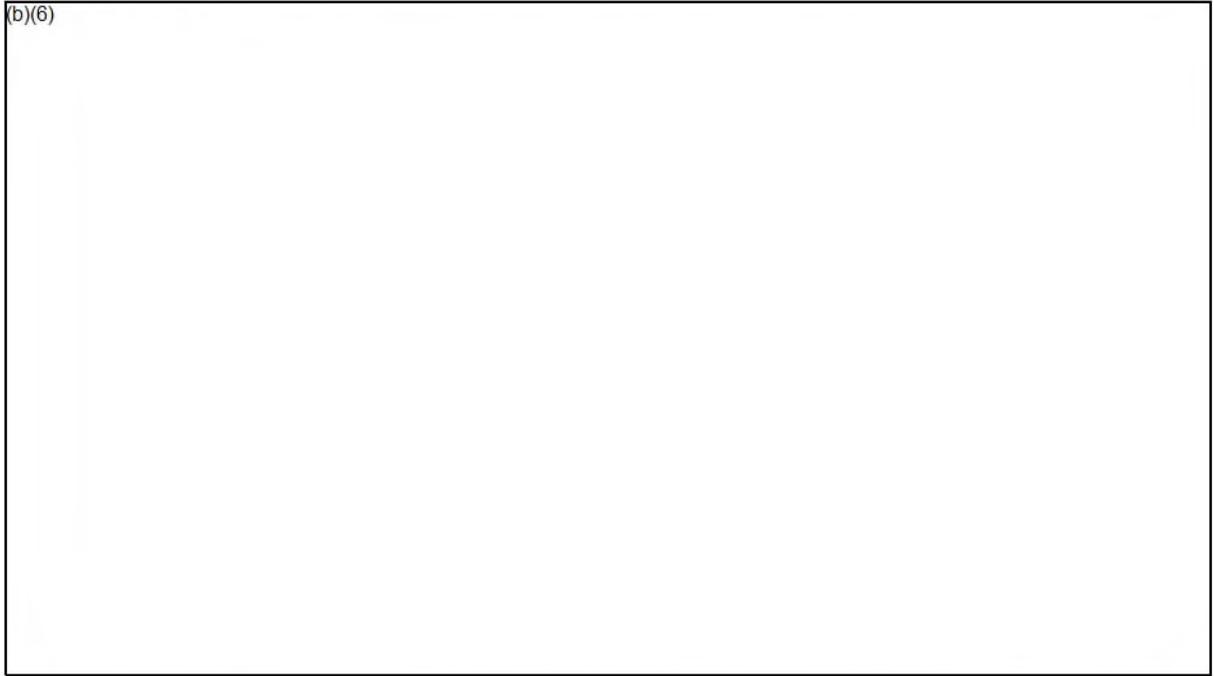
Once its review is complete, the Analyst or manager will update the record and either:

1. Grant the appeal request, make a comment, and mark the record as “Grant Request Verified by Email”

2. Deny the Request, comment very clearly why it was rejected, and mark the record as “Mark Invalid”:

This can also be done at the campus level, which is s provided to the administrators and included in the team's report:

(b)(6)



These reports and observations will be presented to the Council, as appropriate, for consideration of strengthening and enhancing placement definitions, expectations of employment, revisions of outcomes standards, and implementing enforcement actions based on PVP results.

CHAPTER 41: PROGRAM TERMINATIONS

INTRODUCTION

ACICS maintains detailed records of the program offerings at institutions. If a program is discontinued, it is important for ACICS to be notified in a timely manner by requiring campuses to submit formal notice to ACICS via a Program Termination Application. (*Accreditation Criteria* - Section 2-2-503 Termination of Programs).

PROCEDURES

If the campus is teaching-out a program, the same process applies; however, the institution must list the program in *Part II-A-Programs In Teach-Out*, on the application. Once the teach-out is complete, the campus will need to re-submit the Program Termination Application to officially terminate the program.

STEP ONE – SUBMISSION OF APPLICATION

To submit an application, the institution, or campus, logs into the ACICS Member Center and clicks beside *View/Add/Modify Programs by Location*; select the campus location; click on the program that is being terminated; then select “to terminate the program”; finally, upload the requested documentation into the Program Termination Application and proceed to check out. In order to track this process, an application must be submitted but this is a zero-fee application.

STEP TWO – STAFF REVIEW AND APPROVAL

If all of the required materials are not submitted, staff contacts the campus via e-mail for the missing elements and places the application on hold until the missing documents have been received. On a weekly basis, staff must log into the Member Center Analyst Dashboard to check for new Program Termination Application submissions. Upon receipt, staff reviews the completed application and supporting documentation for compliance with *Accreditation Criteria* and determines if the change is appropriate. If the requested change is found to be in compliance with

the *Accreditation Criteria*, an approval letter, U:\Programs\Program Discontinuation and Surrender (Terminations), is generated, turned into a PDF File, and e-mailed to the institution.

STEP THREE – DOCUMENT MANAGEMENT AND APPLICATION COMPLETION

Staff uploads the approval letter into the Program Termination Application in the Member Center and changes the application status to Approved. Then, in Personify, staff changes the program status to either discontinued or surrendered, along with the termination date, which is inputted into the *Valid Until Date*. If the program is in teach-out, staff makes note of the teach-out in the *Note* line and leaves the program as active. Once the program is officially terminated, the school will re-submit a Program Termination Application and staff will officially discontinue the program.

The program information is viewable via the ACICS Institutional Directory online so it is critical that it is **always** accurate and reflects the current activity at the campus.

CHAPTER 42: RECLASSIFICATION OF CAMPUSES

INTRODUCTION

Reclassification of campuses is a process by which owning entities change the current main-branch structure of their campuses with ACICS. It is important to note that the main-branch structure adopted by ACICS is mostly for the agency's use; schools must still be individually licensed in the state where they are located, regardless of their "main" or "branch" status, and most states do not even recognize the structure, and have no process for reclassification. Owning entities can choose to switch the main and branch for a group, or move current branches from one main to another (*Accreditation Criteria – 2-2-200 – Redesignation of Campuses*).

PROCEDURES

STEP ONE – SUBMISSION OF APPLICATION

To submit an application, the institution, or campus, logs into the ACICS Member Center and clicks on the applicable Redesignation Application: *Realignment of a Branch Campus; Reclassification of a Branch Campus to Main Campus; and Reassignment and Consolidation of Campuses*. Once the correct application is identified, completed, and supporting documentation uploaded, the campus remits the appropriate fee for submission and staff review.

- *Realignment of Branch Campuses* involves realigning a branch campus from one main to another main campus; this activity does not include a consolidation action.
- *Reclassification of a Branch Campus to Main Campus* activity involves a branch campus requesting to become the main campus; the main campus has to have been operating as an accredited location for at least two years and must submit audited financial statement.
- *Reassignment and Consolidation of Campuses* involves collapsing institutional groupings and reassigning branch campuses to a new consolidated main campus.

For all Redesignation Applications, documentation required includes the application, evidence of state approval, notification of correspondence with the Department of Education-Title IV, and

audited financials. NOTE--Approval will not be granted unless all of the above elements are received. In cases where the state requires approval from the accrediting agency before it will grant approval, the institution must present evidence from the state in which accreditor approval is required before final approval can be granted.

STEP TWO – STAFF REVIEW AND APPROVAL

If all of the above components are not submitted, staff contacts the institution (since redesignation must be made by the main campus of the institution) via e-mail for the missing elements and places the application on hold until the missing documents have been received. **If the requested information is not received within two weeks of communication, the application will be withdrawn.**

On a weekly basis, staff must log into the Member Center Analyst Dashboard to check for new Redesignation Applications submissions. Upon receipt, staff reviews the completed application and supporting documentation for compliance with the *Accreditation Criteria* and determines if the change is appropriate. If the requested change is found to be in compliance with the *Accreditation Criteria*, an approval letter, U:\COUNCIL\ Realignment of Branch Campus; U:\COUNCIL\Reassignment and Consolidation; U:\COUNCIL\ Reclassification of a Branch Campus to Main Campus, is generated, turned into a PDF file, e-mailed to the institution, and copied to the U.S. Department of Education representative (included in the template), the appropriate U.S. Department of Education School Participation Team representative (found in the most recent Directory of Higher Education Officials), and the appropriate state representative (found in the most recent Directory of Higher Education Officials).

STEP FOUR – DOCUMENT MANAGEMENT AND APPLICATION COMPLETION

Staff uploads the approval letter into the Redesignation Application (*Realignment of a Branch Campus; Reclassification of a Branch Campus to Main Campus; and Reassignment and Consolidation of Campuses*) in the Member Center and changes the application status to Approved.

CHAPTER 47: STUDENT ACHIEVEMENT REVIEW & MONITORING

INTRODUCTION

Requirements imposed by ACICS on all institutions enable the analysis and tracking of key performance indicators that represent bright line standards for retaining accreditation. Institutions that fall below specified standards for institutional effectiveness risk sanctions and penalties, including financial, administrative and ultimately loss of accreditation. In order to apply the information provided annually by institutions to a thoughtful review of their effectiveness, the Council requires and specifies how and when the information will be collected, tabulated and analyzed. This section describes the appropriate steps in its analysis and presentation to the Council for review following the submission through the [Campus Accountability Report](#) (*Accreditation Criteria - Sections 2-1-809 and 3-1-441(b)(c) & Appendix L*).

PROCEDURE

REVIEW OF STUDENT ACHIEVEMENT OUTCOMES - RETENTION, PLACEMENT AND LICENSURE RATES

In preparation for each December Council meeting, the Staff will compile and analyze data on all ACICS member institutions. These data are provided to the [Institutional Effectiveness Committee \(IEC\)](#) for its evaluation of, and action on, campus and program level performance.

STUDENT ACHIEVEMENT REVIEW ACTIONS

The Staff presents reports that list rates for campuses and programs that are below benchmark or the Council standard for retention, placement and licensure, where applicable, for the current year and the last two years. The Committee also has access to the CAR Analytics Dashboard which provides trending data at the campus and program levels, from which assessments can be made. Utilizing the Student Achievement Guidelines outlined in Appendix L of the *Accreditation*

Criteria., the Committee will recommend to Council that action be taken appropriate and consistent with the guidelines.

INSTITUTIONAL COMMUNICATION

In preparation for the meeting, templates will be drafted to communicate the actions to the institutions and following its meeting, the following will be completed:

- Adverse Actions affecting institutional accreditation is sent as priority, with copies to all relevant entities:
 - Withdrawal by suspension of institution, withdrawal of approval of campus or program
 - Campus or Program level show-cause directive
- Campus and Program level compliance warning actions are sent as medium priority but with copies to all relevant entities.
- Campus and Program level reporting actions are sent as an email notification.

Note: Any campus that has been placed on student achievement review must first seek permission from the Council to initiate new programs, offer a higher credential, and open new locations. Hence, this information will be added to the campus's profile for the analysts' review of applications.

REVIEW OF STUDENT ACHIEVEMENT ACTIONS

In preparation for the Council's subsequent review, the Staff will update the chart created for the December Council meeting to reflect the updated rates reported by the institutions. Monitoring and compliance actions will be taken consistent with the guidelines already established. Staff is tasked with ensuring that all actions are accurately recorded and communicated to the affected institutions with follow up action recommended as appropriate.

CHAPTER 48: SUBSTANTIVE CHANGE COMMITTEE

INTRODUCTION

To be compliant with the expectations of the required approval of all substantive changes by the Council prior to their inclusion in an institution's scope of accreditation, the Executive Committee, in its capacity to serve on behalf of the Council, also serves in the role as the Substantive Change Committee (*Accreditation Criteria* – Title II, Chapter 2 – Institutional Changes and Section 2-2-101).

PROCEDURE

The Executive Committee meets at least once a month on a systematic basis as determined by the Chair and appropriate for the Committee. In preparation for the Committee's consideration of substantive change applications requiring its review, staff completes a substantive change agenda which details a summary of the type of substantive change that is being requested by the institution. Additionally, the institutional history is provided: date of accreditation, date of most recent renewal of accreditation, current grant of accreditation expiration date, campus retention and placement rates, cohort default rates, total enrollment, financial reporting status, if applicable, student achievement review status, if applicable, Placement Verification Program (PVP) percentage, current campus program offerings, and an institutional hierarchy chart which gives enrollment and campus -level retention and placement rates. Staff attaches the institution's expansion of scope of accreditation plan which details the how the institution will manage the substantive change (financial, academic and resources) for review and makes a recommendation to the Committee of whether the request should be approved, deferred or denied.

The Executive Committee reviews and discusses the items on the substantive change agenda and the supplemental documents to take an action, which is one of the following:

- 1) Approve the application to initiate the substantive change:

The institution is informed via written communication, within two weeks of the Committee's decision, that the expansion of scope application has been approved. An approval letter for the specific substantive change is sent subsequent to the expansion of scope approval letter.

2) Defer an action and request additional information:

Formal communication is sent to the institution, within two weeks of the meeting, requesting specific additional information for the Committee's subsequent consideration. Once the information has been received, the Committee, at its next meeting, will reconsider the application for action.

3) Deny the application to initiate the substantive change.

The assigned staff will prepare for formal transmission the denial of expansion of scope communication within two weeks of the decision, with specific reasons for the denial, and the application will be withdrawn. The institution is able to appeal the denial action, within a year of the decision, and by providing specific information for the Committee's and/or Council's reconsideration. The appeal will be considered at the next meeting as requested. If the denial is affirmed, the institution is so advised, with no additional opportunities for appeal. If the appeal is approved, the denial of the expansion of scope decision is rescinded, and the appropriate approval letters are prepared.

CHAPTER 50: TITLE IV COMPLIANCE ISSUES, INCLUDING FRAUD AND ABUSE

INTRODUCTION

Council policy requires notification of the U.S. Department of Education regarding any institution accredited by ACICS that is suspected of failing to comply with Title IV law or regulations. Preserving the ability of the Department to investigate and resolve alleged Title IV violations independent of the institution's knowledge is acknowledged and enforced by the Council. (*Accreditation Criteria – Appendix G, Guidelines of Notification and Disclosure*)

PROCEDURE

STEP 1: NOTIFY PRESIDENT

Upon receipt of any information related to possible failure of an accredited institution to comply with Title IV law or regulations or to fraud or abuse committed by an accredited institution, the President will be immediately notified with all the details concerning the matter.

STEP 2: PRESIDENT REVIEW

The President will make a determination as to whether this information constitutes reason to believe that the institution may not be in compliance or may be engaged in fraud or abuse, and will consult with the staff member concerning the basis for this recommendation.

STEP 3: U. S. DEPARTMENT OF EDUCATION NOTIFIED

In the case where the institution may not be in compliance with Title IV law or regulations or may be engaged in fraud or abuse, formal communication will be sent to the Student Financial Aid (SFA) primary contact at the Department of Education with the name of the institution, the reasons for the concern, and the documents to support the concern. The President will also provide any information requested by the Secretary that may bear upon an accredited institution's eligibility to participate in, or compliance with, Title IV, HEA programs.

STEP 4: ACTION

Based upon the information obtained by staff, the institution may be cited as part of a normal ACICS accreditation procedure and given an opportunity to evidence why it is in compliance with Title IV requirements.

STEP 5: CONFIDENTIALITY

ACICS will not inform the institution about the contact in order to preserve the ability of the Department to investigate and resolve the alleged Title IV violation, or upon a specific request from the Department to keep information about the contact confidential.

CHAPTER 51: UNANNOUNCED AND LIMITED UNANNOUNCED VISIT

INTRODUCTION

The Council, at its discretion, may direct an unannounced or limited-announced visit to occur at an institution about which it has received complaints, adverse information, when general operations of the institution may be called into question, or for the purpose of quality assurance review, once the Council has been informed of the institution's intent to not reapply for accreditation. If serious adverse information or complaints are received, consistent with the procedure outlined in the At-Risk Institutions' Group (ARIG) section of this Manual, an unannounced or limited announced visit will be conducted. See *Accreditation Criteria – Section 2-1-805 and Appendix B - Procedures and Guidelines for Unannounced Visits*.

PROCEDURES

An unannounced or limited-announced visit may be scheduled for any of the following reasons:

- ACICS receives recurring or serious complaints/adverse information which may indicate possible non-compliance with ACICS standards
- The institution is on financial reporting with no evidence of financial improvement for three quarters
- Council Directed as a result of institutional review
- Directed by the At-Risk Institutions' Group (ARIG) as a result of a collective review of all risk factors including the above issues, and as outlined in the ARIG procedures (Chapter 27).
- To ensure compliance with ACICS standards through a current grant of accreditation if an institution chooses not to seek reaccreditation.

STEP ONE – CONFIDENTIAL INVITATION TO STATE AND US DEPT. OF ED

A confidential invitation should be sent to the appropriate State/licensing agency, and the U. S. Department of Education (if appropriate), to advise them of the scheduled visit, communicate the

reason for the review, and invite their participation. This formal invitation should be sent after a call to facilitate more direct collaboration.

*If conducting a limited-announced visit, a visit memo must be sent to campus administration 24 hours prior to the visit. If the visit falls on a Monday, the visit memo must be sent on Friday.

STEP TWO – CONFIDENTIAL TEAM COMPOSITION AND VISIT PREPARATION

The team members will be invited to participate and information shared as needed concerning the nature of the visit and the need for confidence (fully unannounced). The team must be composed of seasoned evaluators and may include a commissioner, depending on the circumstances leading up to the visit. A team memo summarizing the review and communicating logistics, consistent with other visit preparation processes, must be sent.

STEP THREE - PRE-VISIT MEETING

A pre-visit meeting, the evening before (ideally) or the morning of, the visit must be conducted to brief the team on the institution, the background of the issues, and the review format onsite. Pertinent information and relevant documents must also be shared.

STEP FOUR – ONSITE EVALUATION

Upon arrival at the campus at approximately 9am (to allow for a full day of review), ask to speak with *the* on-site administrator.

NOTE: *If the institution refuses to permit the on-site unannounced visit evaluation to take place, the Council will direct the institution to SHOW CAUSE why the accreditation should not be withdrawn by SUSPENSION (Appendix B).* The staff member should contact the Vice President of Accreditation and/or the President immediately to share this information so that a recommendation can be presented to the Executive Committee concerning the issuance of the directive.

Taking into account the circumstances that triggered the visit as a determinant for the level and breadth of review, the following will be included as appropriate:

(1) Examine the following records:

- Most recent Campus Accountability Report (CAR) and Summary of Placement Verification (PVP) Submissions
- Current catalog and any supplements
- Current class schedule
- Most recent team visit report and institutional responses
- Copy of any government correspondence on reviews and responses
- List of faculty and staff and their personnel records
- Sample of pertinent student records
- Copy of all promotional materials and access to Web sites
- Files and correspondence on complaints and adverse issues
- Other files related directly or indirectly as appropriate to the primary reason for the visit

(2) Interview selected groups of students. Speak with student, and proctor the student survey, if possible (as applicable).

(3) Visit selected classes in session. Interview faculty without the administrator(s) present.

If there are State/Federal/Licensing Agency observers, collaborate with them on the specific areas of the review that is of particular interest to them. They may also observe meetings with the institution and staff briefings.

STEP FIVE – EXIT REPORT

At the conclusion of the visit, an exit summary should be provided to the administrators. Point out Council policies and procedures concerning unannounced/limited-announced visits, and possible actions by the Council. **NOTE:** The administrator should be provided with a copy of the visit invoice at that time. The visit is a flat fee consistent with the other visit-related fees. *See Schedule of Fees*

STEP 9 – VISIT REPORT

A report of the visit will be prepared and sent to the institution. The drafting of the visit report is coordinated by an assigned team chair or staff with input from team members. A response will be required to any findings identified. Council may take one of the following actions:

STEP 10 – POST-VISIT CORRESPONDENCE

Prepare appropriate correspondence to the institution communicating Council action. Council's action will be consistent with those outlined in Chapter 3, Council Actions, of the *Accreditation Criteria*.



2018 A Campus Accountability Report

As of: 2/25/2020

-, (00276405)

This is the data reported to ACICS by the institution in its most recent Campus Accountability Report

Campus Information

Beginning Population: 66

Ending Population: 59

Non-Program Enrollment: 0 *This number is not included in the ending population

Campus Level Standards

Retention: 100%

Placement: 65%

Program Level Standards

Program Name	Retention	Placement	Licensure
Business Administration (Bachelor's Degree)	100%	0%	N/A
Computer Science (Bachelor's Degree)	100%	50%	N/A
Computer Science (Master's Degree)	100%	67%	N/A
Finance (Bachelor's Degree)	100%	100%	N/A
Finance (Master's Degree)	100%	100%	N/A
Management (Master's Degree)	100%	80%	N/A
Management Information Systems (Bachelor's Degree)	100%	50%	N/A

Cohort Level Standards

Program Name	Cohort	Students	Graduation	Retention	Placement
Business Administration (Bachelor's Degree)	06/18	1	100%	100%	0%
	06/19	2	N/A	100%	N/A
	06/20	1	N/A	100%	N/A
	06/21	1	N/A	100%	N/A
	06/23	2	N/A	100%	N/A
Computer Science (Bachelor's Degree)	06/18	4	100%	100%	50%
	06/19	1	N/A	100%	N/A
	06/20	2	N/A	100%	N/A
	06/21	1	N/A	100%	N/A
	06/22	3	N/A	100%	N/A

Cohort Level Standards

Program Name	Cohort	Students	Graduation	Retention	Placement
Computer Science (Master's Degree)	06/18	6	100%	100%	67%
	06/19	6	N/A	100%	N/A
	06/20	7	N/A	100%	N/A
Finance (Bachelor's Degree)	06/18	1	100%	100%	100%
	06/19	4	N/A	100%	N/A
	06/20	1	N/A	100%	N/A
	06/22	1	N/A	100%	N/A
	06/23	3	N/A	100%	N/A
Finance (Master's Degree)	06/18	3	33%	100%	100%
	06/19	1	N/A	100%	N/A
	06/20	1	N/A	100%	N/A
	09/20	6	N/A	100%	N/A
Management (Master's Degree)	06/18	5	0%	100%	80%
	06/19	2	N/A	100%	N/A
	06/20	5	N/A	100%	N/A
Management Information Systems (Bachelor's Degree)	06/18	2	100%	100%	50%
	06/19	2	N/A	100%	N/A
	06/21	1	N/A	100%	N/A
	06/22	4	N/A	100%	N/A



2019 A Campus Accountability Report

As of: 2/25/2020

-, (00276405)

This is the data reported to ACICS by the institution in its most recent Campus Accountability Report

Campus Information

Beginning Population: 70

Ending Population: 68

Non-Program Enrollment: 0 *This number is not included in the ending population

Campus Level Standards

Retention: 100%

Placement: 77%

Program Level Standards

Program Name	Retention	Placement	Licensure
Business Administration (Bachelor's Degree)	100%	100%	N/A
Computer Science (Bachelor's Degree)	100%	100%	N/A
Computer Science (Master's Degree)	100%	71%	N/A
Finance (Bachelor's Degree)	100%	75%	N/A
Finance (Master's Degree)	100%	67%	N/A
Management (Master's Degree)	100%	67%	N/A
Management Information Systems (Bachelor's Degree)	100%	100%	N/A

Cohort Level Standards

Program Name	Cohort	Students	Graduation	Retention	Placement
Business Administration (Bachelor's Degree)	06/19	2	100%	100%	100%
	06/20	1	N/A	100%	N/A
	06/21	1	N/A	100%	N/A
	06/23	2	N/A	100%	N/A
	06/24	2	N/A	100%	N/A
Computer Science (Bachelor's Degree)	06/19	1	100%	100%	100%
	06/20	2	N/A	100%	N/A
	06/21	1	N/A	100%	N/A
	06/22	3	N/A	100%	N/A
	06/23	2	N/A	100%	N/A

Cohort Level Standards

Program Name	Cohort	Students	Graduation	Retention	Placement
Computer Science (Master's Degree)	06/19	7	100%	100%	71%
	06/20	6	N/A	100%	N/A
	06/21	6	N/A	100%	N/A
	06/22	4	N/A	100%	N/A
Finance (Bachelor's Degree)	06/19	4	100%	100%	75%
	06/20	1	N/A	100%	N/A
	06/22	1	N/A	100%	N/A
	06/23	6	N/A	100%	N/A
	06/24	3	N/A	100%	N/A
Finance (Master's Degree)	06/19	3	100%	100%	67%
	06/20	7	N/A	100%	N/A
	06/21	3	N/A	100%	N/A
	06/22	1	N/A	100%	N/A
Management (Master's Degree)	06/19	3	100%	100%	67%
	06/20	4	N/A	100%	N/A
	06/21	4	N/A	100%	N/A
	06/22	2	N/A	100%	N/A
Management Information Systems (Bachelor's Degree)	06/19	2	100%	100%	100%
	06/21	1	N/A	100%	N/A
	06/22	4	N/A	100%	N/A
	06/23	1	N/A	100%	N/A

ACICS ID	Full-time Student Tuition Rate	Full-time Program Fees	What is the length of program (in months)?	Does this program have separate programmatic accreditation from an accreditor recognized by CHEA or USDE?
00276405	9450	630	48	
Column Total: 7	Column Total: 7	Column Total: 7	Column Total: 7	Column Total: 0
Student ID	Student Name	Start Date (MM/YY)	Scheduled to Graduate Cohort (MM/YY)	Is the student here on a visa?
(b)(6)	[REDACTED]	09/14	06/19	
		04/15	06/19	
		07/15	06/20	
		04/15	06/18	
		04/15	06/21	
		01/18	06/23	
		04/18	06/23	

Programmatic Accrediting Agency (Select Agency)	What percent of your students graduated within the normal length of the program during the current CAR reporting period?	What percent of your students graduated within 150% of the normal length of the program during the current CAR reporting period?	Is licensure required to become employed in your state in this curriculum area?	If the answer to the previous question is yes, list the State, Regional or National Agency which Administers the Required Licensure Examination for this Program
Column Total: 0	Column Total: 7	Column Total: 0	Column Total: 0	Column Total: 0
Does this student receive federal financial aid?	Enrolled as Part of the Beginning Population (July 1, 2017)	New Starts	Re-entries	Transferred into the Program from other Programs at your Institution
	1			
	1			
	1			
	1			
	1			
	1			
	1			

If the Agency Providing the License Based Upon an Examination has a Pass Rate Standard (i.e. the Pass Rate that a Program must Meet or Exceed in Order to be in Good Standing), List the Pass Rate Standard	Program Licensure Pass Rate Published by the Licensing Agency Two Years Ago	Program Licensure Pass Rate Published by the Licensing Agency Last Year	Most Recent Program Licensure Pass Rate Published by the Licensing Agency	Is certification <u>required to become employed</u> in your state in this curriculum area?
Column Total: 0	Column Total: 0	Column Total: 0	Column Total: 0	Column Total: 1
Transferred <u>out</u> the Program from other Programs at your Institution	Revised Scheduled to Graduate Cohort (MM/YY)	Leave of Absence	Completed the Program	Graduated from the Program
				1

<p>If the answer to the previous question is yes, list the State, Regional or National Agency which Administers the Required Certification Examination for this Program</p>	<p>If the Agency Providing the Certification Based Upon an Examination has a Pass Rate Standard (i.e. the Pass Rate that a Program must Meet or Exceed in Order to be in Good Standing), List the Pass Rate Standard</p>	<p>Program Certification Pass Rate Published by the Certification Agency Two Years Ago</p>	<p>Program Certification Pass Rate Published by the Certification Agency Last Year</p>	<p>Most Recent Program Certification Pass Rate Published by the Certification Agency</p>
<p>Column Total: 0</p>	<p>Column Total: 0</p>	<p>Column Total: 0</p>	<p>Column Total: 0</p>	<p>Column Total: 0</p>
<p>Withdrawals Waiver (Select Type)</p>	<p>Withdrawals</p>	<p>Month Submitted to PVP (MM/YY)</p>	<p>Placed Based Upon Job Titles Included in the List of <u>Job Titles</u> Published by the Institution for which the Program Prepares Students</p>	<p>Placed Based Upon the Required Use of <u>Skills</u> in the Student's Program as a Predominant Component of the Job</p>

<p>Is registration required to become employed in your state in this curriculum area?</p>	<p>If the answer to the previous question is yes, list the State, Regional or National Agency which Administers the Required Registration Examination for this Program</p>	<p>If the Agency Providing the Registration Based Upon an Examination has a Pass Rate Standard (i.e. the Pass Rate that a Program must Meet or Exceed in Order to be in Good Standing), List the Pass Rate Standard</p>	<p>Program Registration Pass Rate Published by the Registration Agency Two Years Ago</p>	<p>Program Registration Pass Rate Published by the Registration Agency Last Year</p>
<p>Column Total: 0</p>	<p>Column Total: 0</p>	<p>Column Total: 1</p>	<p>Column Total: 0</p>	<p>Column Total: 0</p>
<p>Placed Based Upon the Benefit of the Training Received from the Program in Maintaining a Current Position with Supporting Promotion, Pay Raise, or Direct Benefit to Job Related Skills</p>	<p>Placement Waiver (Select Type)</p>	<p>Not Placed</p>	<p>Enrolled Without a High School Diploma or Equivalent</p>	<p>Enrolled in One or More Courses Through Distance Learning Delivery Mode</p>
		1		

Most Recent Program
Registration Pass Rate
Published by the Registration
Agency



Column Total: 0

Column Total: 6

Classified as a Fully Online or
100% Distance Learning
Student

Still Enrolled

1

1

1

0

1

1

1

Program Name:

00276405_Computer_Science__04_42663

Document Status:



No Errors Detected

ACICS ID	Full-time Student Tuition Rate	Full-time Program Fees	What is the length of program (in months)?	Does this program have separate programmatic accreditation from an accreditor recognized by CHEA or USDE?
(b)(6)	9450	630	48	
Column Total: 11	Column Total: 11	Column Total: 11	Column Total: 11	Column Total: 0
Student ID	Student Name	Start Date (MM/YY)	Scheduled to Graduate Cohort (MM/YY)	Is the student here on a visa?
(b)(6)	[REDACTED]	09/12	06/18	
		01/14	06/18	
		04/14	06/18	
		01/15	06/18	
		04/15	06/19	
		01/16	06/20	
		04/16	06/20	
		10/17	06/21	
		04/18	06/22	
		04/18	06/22	
		04/18	06/22	

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Most Recent Program
Registration Pass Rate
Published by the Registration
Agency

Column Total: 0

Column Total: 7

Classified as a Fully Online or
100% Distance Learning
Student

Still Enrolled

0

0

0

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1

1

1

1

1

1

1

Document Status:



No Errors Detected

ACICS ID	Full-time Student Tuition Rate	Full-time Program Fees	What is the length of program (in months)?	Does this program have separate programmatic accreditation from an accreditor recognized by CHEA or USDE?	Programmatic Accrediting Agency (Select Agency)
(b)(6)	7650	420	24		
Column Total: 19	Column Total: 19	Column Total: 19	Column Total: 19	Column Total: 0	Column Total: 0

Student ID	Student Name	Start Date (MM/YY)	Scheduled to Graduate Cohort (MM/YY)	Is the student here on a visa?	Does this student receive federal financial aid?
(b)(6)	[REDACTED]	01/15	06/18		
		09/15	06/18		
		04/15	06/18		
		07/15	06/18		
		09/15	06/18		
		09/16	06/18		
		01/17	06/19		
		01/17	06/19		
		09/17	06/19		
		09/17	06/19		
		09/17	06/19		
		09/17	06/19		
		01/18	06/20		
		01/18	06/20		
		01/18	06/20		
		01/18	06/20		
		04/18	06/20		
		04/18	06/20		
07/18	06/20				

Program Name:

00276405_Finance__04_42666

Document Status:



No Errors Detected

ACICS ID	Full-time Student Tuition Rate	Full-time Program Fees	What is the length of program (in months)?	Does this program have separate programmatic accreditation from an accreditor recognized by CHEA or USDE?
00276405	9450	630	48	
Column Total: 10	Column Total: 10	Column Total: 10	Column Total: 10	Column Total: 0
Student ID	Student Name	Start Date (MM/YY)	Scheduled to Graduate Cohort (MM/YY)	Is the student here on a visa?
(b)(6)		07/14	06/18	
		01/15	06/19	
		09/15	06/19	
		09/15	06/19	
		04/16	06/20	
		09/16	06/19	
		09/17	06/22	
		01/18	06/23	
		04/18	06/23	
		04/18	06/23	

Please use this template to provide your Quarterly 2018 CAR information for verification. Cont

<p>If the answer to the previous question is yes, list the State, Regional or National Agency which Administers the Required Certification Examination for this Program</p>	<p>If the Agency Providing the Certification Based Upon an Examination has a Pass Rate Standard (i.e. the Pass Rate that a Program must Meet or Exceed in Order to be in Good Standing), List the Pass Rate Standard</p>	<p>Program Certification Pass Rate Published by the Certification Agency Two Years Ago</p>	<p>Program Certification Pass Rate Published by the Certification Agency Last Year</p>	<p>Most Recent Program Certification Pass Rate Published by the Certification Agency</p>
<p>Column Total: 0</p>	<p>Column Total: 0</p>	<p>Column Total: 0</p>	<p>Column Total: 1</p>	<p>Column Total: 0</p>
<p>Withdrawals Waiver (Select Type)</p>	<p>Withdrawals</p>	<p>Month Submitted to PVP (MM/YY)</p>	<p>Placed Based Upon Job Titles Included in the List of <u>Job Titles</u> Published by the Institution for which the Program Prepares Students</p>	<p>Placed Based Upon the Required Use of <u>Skills</u> in the Student's Program as a Predominant Component of the Job</p>
			<p>1</p>	

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Most Recent Program
Registration Pass Rate
Published by the Registration
Agency

Column Total: 0

Column Total: 9

Classified as a Fully Online or
100% Distance Learning
Student

Still Enrolled

0

1

1

1

1

1

1

1

1

1

Program Name:

00276405_Finance__05_42669

Document Status:



No Errors Detected

ACICS ID	Full-time Student Tuition Rate	Full-time Program Fees	What is the length of program (in months)?	Does this program have separate programmatic accreditation from an accreditor recognized by CHEA or USDE?
(b)(6)	7650	420	24	
Column Total: 11	Column Total: 11	Column Total: 11	Column Total: 11	Column Total: 0
Student ID	Student Name	Start Date (MM/YY)	Scheduled to Graduate Cohort (MM/YY)	Is the student here on a visa?
(b)(6)	[REDACTED]	01/15	06/18	
		01/17	06/19	
		09/16	06/18	
		01/17	06/18	
		09/17	09/20	
		09/17	09/20	
		09/17	09/20	
		01/18	09/20	
		01/18	09/20	
		01/18	09/20	
		04/18	06/20	