

TO: ACICS-Accredited Institutions and Other Interested Parties  
FROM: Accrediting Council for Independent Colleges and Schools  
DATE: March 8, 2011  
SUBJECT: Proposed Criteria and Other Information

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## I. PROPOSED CRITERIA REVISIONS

At its February 2011 Policy meeting, the Council reviewed the specific areas of the ACICS *Accreditation Criteria* outlined in Section I. The language contained in Section I represents proposed criteria changes as a result of the February 2011 meeting (new language is underlined, ~~deleted language is struck~~). Proposed Criteria Revisions that resulted from the December 2010 Council meeting were described in the January 2011 Memorandum to the Field. Both sets of proposed changes will be considered at the April 2011 Council Meeting.

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### A. USDE REGULATIONS ON MISREPRESENTATION

#### *Explanation of Changes*

*The Council discussed sections 668.71 and 668.72 of the new Department regulations concerning Misrepresentation. The regulations require disclosure of information about topics such as programmatic accreditation and they proscribe the communication of misinformation in several other areas. The Council has proposed a modification to Section 3-1-500 of the Accreditation Criteria to ensure that disclosures are made where required and where advisable in order to avoid charges of misrepresentation.*

**3-1-500 – Educational Activities.** The major index of an institution's quality is the effectiveness of its educational program. The educational program must be consistent with the stated mission, be adequate in breadth and context to achieve it, and produce measurable results. Its educational activities, whether residential or otherwise and whether group or individually oriented, shall include definable instruction, interaction, and evaluation. A second index of institutional quality is the resources available to instructors and students.

The third index of an institution's quality is the competence of its faculty. The effectiveness of any institution depends upon contemporary teaching strategies and practices and upon the knowledge, ability, and commitment of its faculty. The selection, orientation, guidance, stimulation, and evaluation of the teaching staff is one of the most significant responsibilities of the administration. The faculty should actively participate in developing the total educational program of the institution.

The faculty shall have a clear responsibility, distinct from that of developing institutional policy, to participate in administering and implementing policy, especially as it pertains to academic affairs. The institution shall adopt and publish a policy on the responsibility and authority of faculty in matters of academic governance. At a minimum, the policy should address the role of faculty in development of the educational program of the institution; selection of course materials, instructional equipment and other educational

resources; systematic evaluation and revision of the curriculum; assessment of student learning outcomes; and planning for institutional effectiveness.

For institutions offering programs in which state certification, licensing, or registration is mandatory in order to become employed in a specific career field, curriculums must contain the necessary course work to afford students the opportunity to obtain the minimum skills and competencies in order to become certified, licensed, or registered in that career field.

Where accreditation of a program by a specialized or programmatic accreditor is required for students to obtain entry-level employment in the state where the institution is licensed, the institution must obtain such accreditation in a timely manner.

The institution must provide and document notification to students as to

- (a) which programs hold specialized or programmatic accreditation;
- (b) whether successful completion of a program qualifies a student to receive, apply to take, or take licensure exams in the state where the institution is located. For on-line programs, this information must be provided for all states from which the institution enrolls students; and
- (c) any other requirements that are generally required for employment.

The institution shall assess the curriculum and/or the need for specialized accreditation and update it as needed to reflect current requirements for employment.

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## **B. WRITTEN ARRANGEMENTS TO PROVIDE EDUCATIONAL PROGRAMS**

### *Explanation of Changes*

*The Council proposes to modify Section 2-2-205 of the Accreditation Criteria in order to comply with changes in Section 668.5 of the Department's regulations. This change restricts the portion of a program that may be provided by one institution to another institution to less than 50% in cases where the institutions are under common ownership or control and where the receiving institution grants the degree or certificate.*

**2-2-505. Contracts or Agreements with Accredited Institutions** ~~Consortium Agreements~~. A written arrangement between one institution eligible to participate in HEA Title IV financial aid programs and another eligible institution or with a consortium of such institutions ~~agreement~~ permits an institution to arrange for a portion of its approved program to be delivered by another accredited institution. ~~in the consortium~~. Contracts or consortium agreements describing these arrangements must be in writing

and must be disclosed in the catalog. Institutions are advised that specific state and federal regulations may apply.

(a) The entire consortium agreement must be submitted to and approved by the Council prior to the institution's participation in the ~~consortium arrangement~~. The institution seeking approval of such an agreement must submit documentation that demonstrates that the other institution or the members of the consortium that will deliver instruction hold institutional accreditation from an accrediting agency recognized by the U.S. Department of Education and that the portion of the program to be delivered by any other institution ~~have~~ has been approved by that institution's accrediting agency.

(b) The consortium agreement must identify how the curriculum and instruction will be monitored, how curriculum revisions will be undertaken, and how student grievances will be addressed. The institution seeking approval of a consortium agreement must acknowledge in writing that it retains ultimate responsibility for the delivery of its programs and the satisfaction of its students.

(c) ~~At least 25%~~ More than 50% of the program must be delivered by the institution that awards the academic credential.

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## C. GAINFUL EMPLOYMENT DISCLOSURES

### *Explanation of Changes*

*The Council proposes to modify the provisions for when a campus or institution that falls below Council expectations must request and may receive prior approval to submit an application to introduce a new campus or program. Under the proposal, only institutions required to submit an improvement plan (rather than all those required to report data) or those under deferral action would be required to receive prior permission to initiate a new campus. In addition, only campuses required to submit an improvement plan (rather than all those required to report data) would be required to receive prior permission to initiate a new program, and institutions seeking to initiate a new program would only be constrained if they were subject to a show-cause directive or negative action.*

**2-2-101. Initiation of Nonmain Campus Activity.** A nonmain campus activity includes any ongoing instructional activity offered at a site away from the main facility. Such activities are described in Section [1-3-100](#). Reporting requirements are as follows...

(a) *Branch Campus.* It is the responsibility of the institution to notify ACICS of the intention to initiate a branch campus before the branch begins classes. Activity must be initiated at the branch campus within one year of the proposed start date. A branch campus must be approved by the Council before advertising, recruiting, and enrollment

may take place. Failure to notify ACICS prior to the initiation of a branch campus may call into question the accreditation of the main campus.

The institution shall provide, on Council forms, the rationale for initiation of the branch and other information about the educational programs, credentials to be awarded, faculty, learning resources, physical and financial resources, strength in supporting fields, admission and graduation requirements, compliance with state law and authority to operate, number of students, and administrative arrangements. An acceptable catalog which identifies the branch campus also shall be included as part of the application.

The Council will monitor the number of branch applications submitted for each main campus and campuses under common ownership based on a demonstration of sound administrative and financial capabilities. The Council reserves the right to limit the number of branches based on its review of demonstrated administrative and financial capabilities.

(b) *Learning Site.* It is the responsibility of the institution to notify ACICS of any new learning site activity prior to initiation. Activity must be initiated at the learning site within one year of the proposed start date. A learning site must be approved by the Council before advertising, recruiting, and enrollment may take place. The institution shall provide, on Council forms, the location of the activity, its educational purpose, the programs offered, the number of students involved, and any additional information ACICS may request.

Any institution which (1) is ~~under review~~ required to submit a financial improvement plan (2) ~~shows either a net loss or a negative net worth on its most recent financial report,~~ (3) ~~is required to report placement and/or retention data to the Institutional Effectiveness Committee,~~ or (2 4) is under a deferral action by the Council must request and receive prior permission from ACICS for the initiation of any nonmain campus activity. An institution under a show-cause directive, a negative action, or in a probation status will not receive approval from ACICS for the initiation of any nonmain campus activity while the action is in effect.

**2-2-501. Initiation and Evaluation of New Programs.** The Council must be notified prior to the start of all new programs. All new programs and modes of delivery must be initiated within one year of the planned start date. A new program must be approved by the Council before an institution advertises, recruits, or enrolls students in the proposed program. The ~~institution~~ campus must submit a program outline, course descriptions, an explanation of the mode of educational delivery, and supporting data. Additional information must be submitted on Council forms. The submission of an Annual Institutional Report or catalog identifying a new program does not constitute appropriate notification to the Council. Any ~~institution~~ campus required to ~~report placement and/or retention data~~ submit a campus retention improvement plan or placement improvement plan to the Institutional Effectiveness Committee ~~or financial reports to the Financial Review Committee may be required to~~ must obtain prior permission from ACICS for the initiation of any new program. Any institution under a show-cause directive, a negative

action, or in a probation status will not receive approval for the initiation of any new programs while the directive is in effect. Any of the following changes to an existing program creates a new program:

(a) any change of 25% or more in existing contact hours, credit awarded, curriculum content (courses offered), or program length of a currently approved program;

(b) a change in academic measurement from clock hours to credit hours or vice versa, or a change from quarter to semester credit hours or vice versa; or

(c) any additions or deletions of courses offered that may change the overall objective of a currently approved program.

For changes in academic measurement described in (b) above, the institution must submit Parts I and II of the New Program Application.

All other substantive changes to programs require the submission of a complete New Program Application. The submission of an Annual Institutional Report or catalog identifying program changes does not constitute appropriate notification to the Council.

An institution proposing new programs must assure ACICS that the programs conform to the stated mission of the institution and its current program offerings. The Council reserves the right when reviewing new programs to review the entire institution.

If a new program complements the general and occupational objectives upon which the institution previously has been evaluated and accredited, and the program is being presented to the public and students as it was presented to ACICS, ordinarily no further evaluation will be required at the time of approval. However, all program offerings of an institution are appropriately evaluated during an institution's regular evaluation for a new grant of accreditation.

If a new program is determined to be substantially different in course content, general or occupational objective, or in promotional description from other programs offered by the institution, ACICS may direct that a visit be conducted even before granting initial inclusion. If the institution has no prior experience with a particular program, a site visit by a subject specialist and Council staff is required before ACICS will grant final inclusion.

If, as a result of any new program visit, ACICS determines that the overall quality of an institution is being diminished, the institution may be scheduled for a full reevaluation.

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## **D. INSTITUTIONAL EFFECTIVENESS PLAN**

### *Explanation of Changes*

*The Council proposes to modify Section 3-1-111 of the Accreditation Criteria in two ways. First, the Council proposes to change the name of the effectiveness plan that is submitted by campuses to the Campus Effectiveness Plan (CEP). Second, the Council proposes to add a requirement that a Distributed Enterprise Institution (DEI), which has demonstrated centralized control of the main campus and all additional locations in order to be classified as a DEI, submit an effectiveness planning document describing plans, data and procedures at the institutional level. It is this new document that will now be called an Institutional Effectiveness Plan (IEP).*

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

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

1. ~~(a)~~ student retention rates;
2. ~~(b)~~ student placement rates;
3. ~~(c)~~ level of graduate satisfaction;
4. ~~(d)~~ level of employer satisfaction;
5. ~~(e)~~ student learning outcomes; and
6. graduation rates.

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

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

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

~~Institutions~~ Campuses are encouraged to include additional information in their plans

For the Institutional Effectiveness Plan of a Distributed Enterprise, the following elements will be evaluated for institutional effectiveness, at a minimum:

### **PLANS**

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

### **DATA**

1. 3 Years of retention and placement data (historical data)
2. Retention and placement trend data, by program system-wide.
3. System demographics data
4. Comparison/analysis of baseline data between enterprise campuses
5. Analysis of system cohort default rates.
6. Learning outcomes assessment
7. Graduation Rates

### **PROCESS**

1. IEP "Implementation Team" at the Distributed Enterprise
2. The curriculum review process.
3. Internal controls

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

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

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## **E. PUBLIC MEMBERS OF THE REVIEW BOARD**

### *Explanation of Changes*

*Section 602.14(b) of the Department's regulations requires that at least one member of an accrediting agency's decision-making body is a representative of the public and that at least one-seventh of that body consists of representatives of the public. Section 602.15 now applies this requirement to all decision-making bodies. Since the panels of the Review Board have the power to remand, reverse, affirm or modify decisions made by the Council, they are decision-making bodies. The changes proposed by the Council in Section 2-3-600 of the Accreditation Criteria are intended to bring that section into compliance with Department regulations.*

### **2-3-600 - REVIEW BOARD APPEAL PROCESS**

For those institutions that appeal to the Review Board a denial action as described in Sections 2-3-301 and 2-3-304 or a suspension action as described in Sections 2-3-402 and 2-3-404, the Council has established procedures designed to provide due process.

**2-3-601. Purpose and Authority of Review Board.** The Review Board is a separate, independent appeals body established by the Council for the purpose of hearing appeals by institutions for actions specified in Sections 2-3-301, 2-3-304, and 2-3-402.

**2-3-602. Appointment of Members.** The Review Board shall consist of fifteen (15) persons, all of whom have had experience in accreditation, who are appointed to three-year terms. A person appointed shall not have been a commissioner within one year prior to appointment. At least three (3) members shall be public members, as defined in Appendix A.

A Review Board panel of three to seven persons, depending on the scope and complexity of the matter or institution being reviewed, will be designated by the Council from the entire Review Board to hear an appeal from an institution. The Council also will designate one member of the Review Board panel to serve as chair. The selection and actions of the panel are subject to ACICS conflict of interest policies. At least one (1) member of the panel shall be a public member.

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## F. DISTRIBUTION OF RESOURCES AND MATERIALS

### *Explanation of Changes*

*The Council proposes to add language that specifies that exclusively online resources are acceptable for utilization in non-degree programs.*

**3-2-202. Distribution of Resources and Materials.** The instructional resources and references may be consolidated or may be distributed throughout the educational facility, or they may be provided by the institution under contract with an external organization on behalf of its student body which ensures access to library resources and references pertinent to the programs offered by the institution; includes resources that are accessible exclusively online. Easy access to and use of reference materials, periodicals, and information technology are of prime importance in determining if the institution is meeting the educational needs of its students and faculty. Availability and utilization of audiovisual equipment also are important.

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## G. INSTITUTION NAMING

### *Explanation of Changes*

*The Council proposes to delete language that is no longer used to identify institutions.*

### INTRODUCTION

In addition to the general standards in Chapter 1, which apply to all institutions, the following standards apply specifically to academic associate's degree programs. All Associate of Art and Associate of Science degree programs are academic associate's degree programs. Any other associate's degree programs that include at least 15 semester hours, 22.5 quarter hours, or the equivalent of general education also are considered to be academic associate's degree programs. Institutions that offer academic associate's degree programs are collegiate institutions, ~~and only those institutions that offer academic associate's degree programs may refer to themselves as junior colleges.~~

### INTRODUCTION

In addition to the general standards in [Chapter 1](#), which apply to all institutions, the following standards apply specifically to bachelor's degree programs. Institutions that offer bachelor's degree programs are considered to be collegiate institutions, ~~and only those institutions that offer bachelor's degree programs may refer to themselves as senior colleges.~~

**2-2-601. Change of Name.** The Council must be notified and grant approval when an institution decides to change its name. Forms are supplied for the institution to explain and justify the change. The Executive Director has the authority to review and approve a change in name. The following limitations apply:

~~(a) “junior college” may be used only by those institutions that offer at least an academic associate’s degree;~~

~~(b) “senior college” may be used only by those institutions that offer at least a bachelor’s degree; and~~

(c) “university” may be used only by those institutions that offer a master’s degree.

These limitations are effective for all Change of Name applications received after January 1, 1997. All institutional names approved prior to that date may be retained.

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## H. TEACHING LOADS

### *Explanation of Changes*

*The Council proposes to add language that addresses the need for graduate faculty teaching loads to allow time for professional activities/and or scholarship.*

**3-6-503. Teaching Load.** Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; the academic advising, committee membership, and guidance and student organizations assigned; and the other administrative, research, publication, professional activities and/or scholarship, and community relations responsibilities of the instructor.

**3-7-503. Teaching Load.** Teaching loads shall be reasonable and shall be justified by factors such as the number of different preparations required; the type and method of instruction; the size of classes; the level of instruction; the qualifications of the instructor; academic advising, committee membership, and student guidance assigned; and the other administrative, research, publication, professional activities and/or scholarship, and community relations responsibilities of the instructor.

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## I. FACULTY ASSIGNMENTS

### *Explanation of Changes*

*The Council proposes to add language to differentiate between the faculty requirements to teach applied general education and general education.*

**3-3-302. Assignments.** During any academic term, a faculty member shall not be assigned to teach in more than three fields of instruction (e.g., medical assisting, business administration, information technology). Not more than five preparations in different subjects (e.g., Accounting I, Accounting II, Keyboarding I, Business Mathematics, and Business Law) shall be assigned to an instructor during one academic term. Instructors shall be assigned based on their major and minor academic preparation and/or related experience. The size of the faculty shall be appropriate to the total student enrollment.

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

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

(b) Instructors teaching general education shall hold a minimum of a master's degree and will be assigned based on their major and minor academic preparation. Instructors shall have a minimum of 18 semester or equivalent hours of coursework in their teaching discipline.

Instructors teaching courses other than general education shall hold bachelor's degrees at a minimum and shall be assigned based on their major and minor academic preparation and/or related experience. However, exceptions to the bachelor's degree requirement may be justified for instructors who have demonstrable current exceptional professional level experience in the assigned field, such as documented coursework in the field, professional certification(s), letters of recommendation or attestations from previous employer(s), letters attesting to this expertise from professional peers not connected to the college, real examples of previous success in the field such as published work, juried exhibits and shows, evidence of a professional portfolio accepted by the college and available for review, and other significant documented experience relevant to the courses to be taught. Minors or related degrees could be considered but will not be the sole determining factor. Duration of time associated with this alternative justification is dependent on the quality and significance of the work experience. The institution must be able to justify the assignment of any instructor who does not hold a bachelor's degree in the assigned teaching field.

~~(b)~~ (c) A bachelor's degree is required for faculty members teaching business and business administration courses. If the bachelor's degree is not in the assigned teaching field, at least two years of related work experience or evidence of specialized training or competency in the assigned teaching field is required. The burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses.

~~(c)~~ (d) Faculty members teaching courses not referenced above must demonstrate competency in the assigned teaching field, such as academic or vocational training and

credentials, related work experience, licensure, or certification. The burden is on the institution to demonstrate and justify the qualifications of the faculty to teach their assigned courses.

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## **II. FOR INFORMATION ONLY**

### **A. DEFINITION AND REVIEW OF CREDIT HOUR ALLOCATION**

At its Policy Meeting in February 2011, the Council reviewed the final USDE regulation, Section 600.2 of 34 CFR, effective July 1, 2011, involving the review by accreditors of out-of-class student assignments. Accreditors are charged in those regulations to include, as part of their review for initial or new grants, an evaluation, with reference to the Department's new credit hour definition, of the institution's policies and procedures for determining credit hours and the application of those policies and procedures to its courses and programs. Based upon this evaluation the accreditor must make a "reasonable determination" of whether the institution's assignment of credit hours conforms to "commonly accepted practice" in higher education.

Although ACICS currently uses a definition of credit hour similar to that included in the new regulation, the Council discussed the possibility of modifying the *Accreditation Criteria* to incorporate the exact language of the new definition and to make clear its expectation that institutions would have written policies and procedures which could be reviewed, as well as statements in syllabi describing out-of-classroom assignments which could be evaluated. Student interviews might also include a question about out-of-classroom assignments in their classes.

Because the inclusion of a definition of credit hour in USDE regulations is the subject of some dispute and that evaluation procedures that will be considered to be reasonable are unclear, the Council decided not to propose any changes in its policies or procedures at this time but to consider the subject again after the Department releases additional guidance. Guidance in the form of a "Dear Colleague Letter," is expected sometime prior to the April meeting of the Council, at which time this topic will be taken up again for discussion.

### **B. CREDIT ALLOCATION FOR CLOCK HOUR PROGRAMS**

At its Policy Meeting in February 2011, the Council reviewed Section 668.8(1) of the final rules published by the USDE, effective July 1, 2011, dealing with clock hour programs. This section of CFR 34 now allows institutions to maintain the financial aid eligibility of clock hour programs that comprise a minimum of 37.5 clock hours per semester (or trimester) credit and 25 hours per quarter credit, so long as the institution's accreditor reviews the policies and procedures for awarding financial aid and their application and makes a "reasonable determination" that the institution is utilizing "commonly accepted practice" in allocating for at least 7.5 hours of outside-of-class assignments (in addition to at least 30 hours of classroom instruction) per semester (or trimester) credit or for at least 5 hours of

outside-of-class assignments (in addition to at least 20 hours of classroom instruction) per quarter credit .

As a service to its member institutions, ACICS will provide in the near future an *ACICS Advisory* including a form and instructions for institutions to submit information about the hours of classroom instruction, the hours of outside-of-class assignments, and the academic rationale for those assignments . The form and instructions will also be available on the ACICS Website. ACICS will review the information submitted, together with documentation including class syllabi, and will provide the institution with an evaluation that may be shared with the U.S. Department of Education. This process is subject to change, pending receipt of additional guidance from the Department.

### **C. GAINFUL EMPLOYMENT**

**Placement Rate** - With respect to job placement rate, ACICS will continue to calculate program-level and institution-level placement rates according to its current definition, although when the department issues its own official definition, the Council will consider whether to adopt that definition in place of its own. In addition, the Council considered proposals to expand the application of its standards to include program-level placement rates. At its April meeting, the Council will consider additional information on the impact of various program-level standards and may determine specific expectations on the basis of that information.

The Council also considered proposed changes to the schedule of sanctions that is applied to institutions the fall below expectations with respect to placement (which is currently set at 65%) and also with respect to retention (which is currently set at 60%). The schedule is based upon two factors: how far below these expectations an institution falls and how many years an institution has fallen below expectations. The Council will also review information on the proposed modification to the current schedule of sanctions at its April meeting.

Finally, the Council considered changes to the provisions for when an institution that falls below expectations for either retention or placement must request prior approval to submit an application to introduce a new program or a new campus. These changes are described in the proposed modifications to Sections 2-2-101 and 2-2-501 of the Accreditation Criteria in a previous section of this memorandum.

**Graduation Rate** – The Council also considered whether to add the new graduation rate whose disclosure is part of the USDE regulation to the five elements (two process measures, two satisfaction measures, and measures of student learning outcomes) that are required in the Institutional Effectiveness Plan (IEP) and to the two process measure (retention and placement rates) for which data are collected annually in the Annual Institutional Report (AIR). The Council has been concerned for several years that these two educational process metrics do not adequately define the effectiveness of career education institutions at retaining students until they graduate and then obtain employment. A measure of the rate at which students actually graduate is needed to bridge the information gap between the two existing

metrics and provide a comprehensive set of measures to evaluate the effectiveness of the educational process.

The Council has felt that the Department's Student Right to Know (SRK) measure of the rate at which first-time, full-time students graduate is too limited for this purpose, since many, if not a most, career education students are either transfer students or part-time students and therefore are not included in the SRK measure. On the other hand, while the definition of the "on-time graduation rate" whose disclosure is now required by the USDE regulations does include all students, this measure will still not fill the gap in process measures, because it is based upon the number of students who graduate, not the number of students who enroll and are retained through to graduation. Moreover, it measures the percentage of graduates who graduate during the "normal" length of the program, as defined by the institution, whereas one strength of the SRK measure is that it does not penalize the institution when students take more than this normal length of time to graduate. The SRK rate measures the percent of students who enroll and graduate within 150% of the normal time.

Consequently, the Council directed staff to work with a technical advisory group of institutional representatives to develop a comprehensive definition of the percentage of students who enroll, persist and graduate within 150% percent of the normal length of their programs, as defined by the institution. This definition will include not only first-time students but also transfer students. It will include not only full-time students but also part-time students. The Council will review a progress report on this definition at its April meeting.

### III. COMMENT FORM – PROPOSED CRITERIA REVISIONS

ACICS ID Code: \_\_\_\_\_ Date: \_\_\_\_\_

Name of  
Organization: \_\_\_\_\_

Address: \_\_\_\_\_

***Please check (as appropriate):***

Proposed *Accreditation Criteria* revisions:

- USDE Regulations on Misrepresentation  
[ ] Accept as Written [ ] Modify (please explain)
  
- Written Arrangements to Provide Educational Programs  
[ ] Accept as Written [ ] Modify (please explain)
  
- Gainful Employment Disclosures  
[ ] Accept as Written [ ] Modify (please explain)
  
- Institutional Effectiveness Plan  
[ ] Accept as Written [ ] Modify (please explain)
  
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- Distribution of Resources and Materials  
[ ] Accept as Written [ ] Modify (please explain)
  
- Institution Naming  
[ ] Accept as Written [ ] Modify (please explain)

- Teaching Loads

Accept as Written     Modify (please explain)

- Faculty Assignments

Accept as Written     Modify (please explain)

Prepared by: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

**Please respond by Monday, April 4, 2011 to:**

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