

TO: ACICS-Accredited Institutions and Other Interested Parties
FROM: Accrediting Council for Independent Colleges and Schools
DATE: May 11, 2012
SUBJECT: Final Criteria, Proposed Criteria and Other Information

<u>TABLE OF CONTENTS</u>	<u>PAGE</u>
I. FINAL CRITERIA REVISIONS	2-7
A. Federal Credit Hour Definition - <i>Effective July 1, 2012</i>	2-4
B. Show-Cause Directive - <i>Effective Immediately</i>	4
C. Due Process Recognition Standards- <i>Effective Immediately</i>	5-7
II. PROPOSED CRITERIA REVISIONS	8-13
A. Program Compliance Warning	8-9
B. Professional Master's Degree	9-10
C. Electronic Transcripts	10
D. Definition of Distance Education	10-11
E. Definition of Campus Effectiveness Plan Elements	11-13
III. FOR INFORMATION ONLY	13-25
A. Cohort Default Rates	13
B. ACICS Web Site	13-14
C. Workshops	14
D. Public Comment	14-15
E. Public Participation	15
F. ACICS AWARE Webinars	15
G. Campus-Level and Program-Level Standards	15-17
H. Guidelines for Evaluating Assignment of Credit Hours for Federal Financial Aid	17-24
IV. COMMENT FORM – PROPOSED CRITERIA REVISIONS (Please respond by Friday, July 6, 2012)	25-26

I. FINAL CRITERIA REVISIONS

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

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

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

A. **FEDERAL CREDIT HOUR DEFINITION-Effective July 1, 2012**

Explanation of Final Changes

As part of its evaluation of an institution for initial accreditation or renewal of accreditation, ACICS will review the institution's policies and procedures for determining credit hour assignments for purposes of awarding federal financial aid. The purpose of this review is to evaluate the reliability and accuracy of the institution's assignment of credit for these purposes, and this evaluation is distinct from the review of credit assignment for academics purposes, as outlined in Section 3-1-516. Therefore, the Council has approved an addition in a new Section 2-2-503 of a description of the federal definitions which the institution must reference in its policies and procedures and which the institution must apply to the out-of-class assignments on its course syllabi. The definition of credit hours in 2-2-503(a) applies to credit hour courses and programs, while the definition of conversion formulas in 2-2-503 (b) applies to undergraduate degree programs of less than two years in length and non-degree programs that are not fully transferrable to degree programs and which are not required by the USDE to be defined as clock hour programs.

These definitions were effective July 1, 2011. However, the USDE has granted institutions and their accreditors one year to come into compliance as long as they make a good faith effort. ACICS plans to develop and inform institutions about the review process during Winter and Spring 2012 and begin implementation in the Fall 2012 travel cycle.

...

2-2-503. Evaluation of Programs for Purposes of Federal Financial Aid.

As part of its evaluation of an institution for initial accreditation or renewal of accreditation, ACICS will review the institution's policies and procedures for determining credit hour assignments for purposes of awarding federal financial aid. ACICS will evaluate the reliability and accuracy of the institution's assignment of credit hours, as defined in 34 CFR 600.2 and in 34 CFR 668.8(k) and (l), to courses and programs and will determine whether this assignment conforms to commonly accepted practice in higher education.

- a) **Credit Hours for Credit Hour Programs.** The evaluation of credit hour programs, as defined in 34 CFR 688.8(k)(1), for purposes of financial aid is based on the following federal definition of a credit hour:

Except as provided in 34 CFR 668.8(k) and (l), a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than--

(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or

(2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

- b) **Credit Hours for Programs that are neither Credit Hour nor Clock Hour Programs.** Clock hour programs as defined in 34 CFR 688.8(k)(2) may not assign credit hours for the purpose of awarding federal financial aid. However, undergraduate degree programs of less than two years in length and non-degree programs that are not fully transferrable to degree programs of at least two years in length (with at least two graduates) at the same institution are eligible to convert clock hours to credit hours for purposes of awarding federal financial aid. In doing so, these programs may seek to combine a minimum number of hours in a range of hours of student work outside of class with a required minimum number hours of instruction alone to meet or exceed a total number of clock hours of instruction. The evaluation of these clock-to-credit hour programs is based upon the following federal conversion formulas:

The institution's student work outside of class combined with the clock hours of instruction meet or exceed the following numeric requirements:

(i) A semester hour must include at least 37.5 clock hours of instruction;

- (ii) A trimester hour must include at least 37.5 clock hours of instruction; &
- (iii) A quarter hour must include at least 25 clock hours of instruction;

And the clock hours of instruction alone meet or exceed the following numeric requirements:

- (A) A semester hour must include at least 30 clock hours of instruction;
- (B) A trimester hour must include at least 30 clock hours of instruction;
- and
- (C) A quarter hour must include a least 20 hours of instruction.

B. SHOW-CAUSE DIRECTIVE- *Effective Immediately*

Explanation of Final Changes

The Council approved final language to clarify that such a directive, while not in itself a negative action, is predicated upon the determination by the Council that a campus is no longer in compliance with its standards and therefore must come into compliance within the established timeframes.

2-3-403. Show-Cause Directive. When the accreditation of an institution is subject to suspension action (other than summary suspension under Section 2-2-301) because the Council has reason to believe that the institution is not, or may not be, in compliance with the Accreditation Criteria, the institution will be provided in writing with the alleged deficiencies and will be invited to “show cause” why its accreditation should not be suspended or otherwise conditioned. A show-cause directive is not a negative or conditioning action. Rather, it is issued to an institution for it to come forward and prove that a negative or conditioning action should not be taken. However, the opportunity to show cause before the Council will be considered to be a hearing as defined in Section 2-3-500. A suspension order may be issued by ACICS as the result of this hearing, and such action is considered a final action which may only be appealed to the Review Board as described in section 2-3-600. Following receipt of a show-cause directive, the institution must bring itself into compliance within the timeframes specified in Title II, Chapter 3, or the institution will be subject to final adverse action.

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

C. DUE PROCESS RECOGNITION STANDARDS - *Effective Immediately*

Explanation of Final Changes

The Council approved final language revisions to ensure that due process protections afforded member do not inadvertently enable an institution to remain out of compliance with ACICS standards beyond the maximum timeframes codified in federal regulations. Those maximum timeframes, from, beginning with the day the Council determines an agency to be out of compliance, are 12 months for institutions offering programs less than one year in length; 18 months for institutions offering programs at least one year in length but less than two years in length, and 24 months for institutions offering programs at least two years in length.

Chapter 3 Council Actions

INTRODUCTION

When the Council has considered all of the information and reports submitted as a result of the accrediting process, it will make a judgment as to an institution's compliance with the *Accreditation Criteria*. The Council's decision is based on the extent of an institution's compliance. The judgment made is referred to as a "Council action." The actions which the Council may take are described in this chapter. Procedures available to institutions to challenge those actions, and the maximum timeframes for achieving final disposition of those actions by the Council, also are explained. There are four general areas of Council actions: accreditation granted, accreditation deferred, accreditation denied, and accreditation withdrawn.

If the Council determines ~~believes~~ that an institution is not in compliance with the *Accreditation Criteria*, it will take prompt adverse action against the institution, or it will require the institution to take appropriate action to bring itself into compliance with the *Accreditation Criteria* within a time frame specified by the Council after the institution has been notified that it is not in compliance. That time frame will not exceed the following:

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

The above time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in completion or placement rates.

...

2-3-200 - ACCREDITATION DEFERRED

When an institution is measured against the criteria and is found not to be fully in compliance, or there is insufficient evidence available for the Council to make a decision, ACICS may defer action until a later date pending receipt of additional information. In such cases, ACICS will provide in writing the reasons for the deferral, state what the institution needs to provide, and invite a response to the findings by a specific date.

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

...

2-3-304. *Subsequent Action.* After consideration of the institution’s objection to the denial and any new evidence presented, the Council may affirm, modify, or reverse its previous decision: in a timeframe not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the *Accreditation Criteria*. If the denial of a new grant, branch inclusion, or change of ownership or control is affirmed, the denial action may be appealed to the Review Board pursuant to Section [2-3-600](#). If the denial not affecting overall accreditation as described in Section [2-3-303](#) is affirmed, the denial action becomes final and no further remedy is available to the institution. In all cases of denial, the Council retains discretion to specify whether and under what conditions the institution might initiate a request for consideration of the same type of application.

...

2-3-500 - COUNCIL HEARING PROCEDURES

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

(a) The request for a hearing must be made by a date determined by the Council, which will not be less than 10 days from the date of receipt of the letter of notification of the denial action or show-cause directive. The request for a hearing must be in writing and signed by the chief executive officer of the institution. Upon receipt of the request for a hearing, the Council will notify the institution of the procedures to follow to prepare for

the hearing, including the dates by which the institution must submit its response to the findings of the denial action or show-cause directive. In all cases, the interval between the negative or conditioning action of the Council and the subsequent action of the Council based on the hearing of the institution's appeal shall not exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length.(b) The institution shall have the right to respond with evidence and facts concerning the areas of noncompliance with which it has been charged, to raise all reasonable questions, and to present evidence in opposition to or extenuation of the charges of noncompliance. Such written evidence must be submitted by the date prescribed by the Council unless the institution can show that such information was not available before the submission date and that failure to make a timely submission was outside of the institution's control. (c) At the hearing, the institution may present only evidence not already considered. The institution may send one or more representatives, including legal or financial counsel, to present its argument in opposition to or extenuation of the Council action. The Council transcribes all such hearings for its records. A copy of the transcript is available to the institution upon request.

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

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

2-3-502. Financial Hearings. All hearings before the Council for financial concerns only will be heard by a panel of at least three commissioners, which will include at least one representative of the Financial Review Committee. The panel will present its findings and its recommended action to the full Council, which will make the final decision: in a time frame not to exceed twelve months, if the longest program is less than one year in length; eighteen months, if the longest program is at least one year, but less than two years in length; and two years, if the longest program is at least two years in length from the time the institution was found out of compliance with the Accreditation Criteria.

II. PROPOSED CRITERIA REVISIONS

At its April 2012 meeting, the Council reviewed the specific areas of the ACICS *Accreditation Criteria* outlined in Section II and approved the revisions as **proposed** (new language is underlined, ~~deleted language is struck~~). **Public comment on these revisions is requested on the Comment Form provided at the end of this memorandum.**

A. PROGRAM COMPLIANCE WARNING

Explanation of Proposed Changes

The Council proposes to add language to the actions it can take a “program compliance warning”. This action would serve to notify an institution that it has one or more programs out of compliance with program-level standards and that the program(s) must be brought into compliance or be taught out and discontinued within the appropriate timeframe.

2-2-504. Program Compliance Warning. When the Council determines that a program at a campus of the institution has fallen below the compliance standards for student achievement, the institution will be provided in writing with a warning regarding the alleged deficiency. Following receipt of a program compliance warning, the institution must bring itself into compliance within the timeframes specified in Title II, Chapter 3, or the institution will be subject to final adverse action in the form of withdrawal of approval for inclusion of the program within the institution’s grant of accreditation. A program compliance warning is not a negative or conditioning action and is therefore not appealable.

2-2-5045. Termination of Programs. The withdrawal of approval for a program following the issuance of a program compliance warning or A a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested publics. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program will be directed to submit a program termination plan that conforms to the following requirements, which also apply in the case of voluntary termination of a program. New students may not be enrolled in any program which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic progress to complete the program.

The withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the nature and scope of the withdrawal of program approval, the appeal to the Council may be in writing only.

To maintain approval, an institution must maintain enrollment in each program of study. If an approved program is inactive for at least three years, the program will be considered discontinued and will be removed from the institution's list of approved programs. To reinstate the program, the institution must submit an ACICS New Program Application.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) and Institutional Accountability Report (IAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention; placement; and licensure, registration or certification pass rates, if applicable. When this review indicates that the achievement of an institution's students is weak or deteriorating, the Council will require the institution to add an improvement plan within its Campus Effectiveness Plan (CEP) and/or Institutional Effectiveness Plan (IEP). If the Council determines the institution no longer complies with the Council's requirement for student achievement, the Council will issue a show-cause directive, a program compliance warning, or otherwise take negative action and require the institution to demonstrate compliance within the time frames described in Title II, Chapter 3. Institutions that are required to include a plan of student achievement improvement within their CEPs or that are determined to be out of compliance with the Council's standards for student achievement are considered to be on student achievement review and those with campus- or institution-level plans are subject to additional requirements.

2-3-303. Other Denial Actions Not Affecting Overall Accreditation. An institution that objects to a Council decision to deny an application for additional location-to-freestanding status or new program inclusion will be given the opportunity to present its case to a panel of the Council and to be heard at a subsequent regularly scheduled meeting of the Council. An institution that objects to a Council decision to withdraw approval for a program inclusion will be given the opportunity to present its case to a panel of the Council in writing and to be heard at a subsequent regularly scheduled meeting of the Council. The institution may offer new evidence that will be considered by the Council if timely submitted.

B. PROFESSIONAL MASTER'S DEGREE

Explanation of Proposed Changes

The Council proposes to add language permitting institutions to accept eligible students to enter professional Master's degree programs prior to completion of a baccalaureate

degree if such a practice is acceptable to a specialized accrediting or state professional agency. “Professional” programs are those that prepare graduates to take an industry recognized certification, licensure, or registration examination required to practice in the professional field.

If admission to a professional program is granted without a baccalaureate degree, the burden is on the institution to demonstrate and justify that the alternate admission requirement is accepted by a recognized licensing or specialized accrediting agency and is common practice among accredited institutions of higher education.

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

C. ELECTRONIC TRANSCRIPTS

Explanation of Proposed Changes

The Council proposes to add language to permit the use of electronic official transcripts to verify faculty credentials.

3-1-542. Verification of Credentials. Institutions must maintain official transcripts for credentials that qualify faculty members to teach their assigned courses and for those credentials that are listed in the catalog. All these credentials shall be on file in the administrative offices at the campus location nearest to where the faculty member is primarily employed. An official transcript is one sent from the registrar’s office at the institution where study was completed directly to an employing institution; or downloaded electronically from a link provided to the employing institution from the institution where study was completed. Transcripts received electronically must bear an indication that it is an “official transcript” and the link provided must have information on how to verify the authenticity of the transcript. A transcript bearing the notation “issued to student” is not an official transcript for employment purposes.

D. DEFINITION OF DISTANCE EDUCATION

Explanation of Proposed Changes

The Council proposes to modify language in the Glossary to clarify the definition of distance education.

Distance Education or Distance Learning. A structured educational situation in which ~~the instructors and learners are separated by time and location~~ students and instructors are

physically separated. Distance education supports regular and substantive interaction synchronously ~~and~~ or asynchronously, between instructor and learner, among learners, and between learners and learning resources through one or more interactive technologies. ~~The technologies may include the following: the internet; interactive transmissions through broadcast, closed circuit, cable, satellite, or wireless communications devices; and two-way audio or videoconferencing.~~

E. DEFINITIONS OF CAMPUS EFFECTIVENESS PLAN ELEMENTS

Explanation of Proposed Changes

The Council proposes to add language to the Glossary to define the required elements of the Campus Effectiveness Plan: Retention Rates, Placement Rates, Graduate Satisfaction, Employer Satisfaction, Student Learning Outcomes, and Graduation Rates.

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

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

monitoring, show cause directives or negative action including loss of program approval, campus inclusion or institutional accreditation.

Graduation Satisfaction Level – The level of graduate satisfaction is a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the *Accreditation Criteria*). Graduate satisfaction and the level of satisfaction are defined by the institution based upon information collected on a regular basis from students who have graduated from the programs offered by the institution. Recommended information includes a systematic survey of graduates. Satisfaction questions should cover different aspects of the program and the institution as well as overall satisfaction of the graduate with the career preparation provided by the institution.

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

Student Learning Outcomes – Student Learning Outcomes are a required element of the Campus Effectiveness Plan (See Section 3-1-111 of the *Accreditation Criteria*). Student Learning Outcomes are defined by the institution based upon information collected on a regular basis by faculty in the programs offered by the institution. Recommended information includes data on student learning outcomes from job-specific courses as well as from general education courses, where applicable. Measure should, where possible, be applied rather than abstract or theoretical, integrated rather than fragmented, and program-level rather than course-level or institution-level. Examples of evidence include student externship/practicum grades, student portfolio grades, capstone course grades, GPA, CGPA, pre—and post-tests, ATB and other entrance or course placement assessments, graded portfolios, standardized tests, professional licensure exams, program reviews, skill checklists, competency tests, clinical work and senior projects. Placement data and graduate surveys should not be used as a measure of student learning outcomes.

Graduate Rate (when available) – ACICS is developing a measure of graduation rates that is comprehensive and applicable at the program, campus, and institution level. Once the measure has been implemented through the Campus Accountability Report and validated, the graduation rate will be a required element of the Campus Effectiveness Plan (see Section 3-1-111 of the *Accreditation Criteria*). The comprehensive graduation rate is defined by ACICS in terms of the number of students who have completed or graduated, divided by the number of completers and graduates plus the number of students who have withdrawn, and expressed as a percent. The comprehensive graduation rate, also call the graduates-to-leavers ratio, is calculated at both the program

and campus levels, based upon data submitted for the annual Campus Accountability Report (CAR) and according to the detailed formula and terms defined in the Guidelines and Instructions for the Campus Accountability Report, which is available on the ACICS website. The detailed formula includes definitions, adjustments, and exclusions for calculating completers, graduates, and withdrawals.

Other measures of graduation rates, such as the U.S. Department of Education's On-Time Graduation Rate required to be disclosed by Title IV, HEA participating institutions or the IPEDS student right to know measure of the first-time, full-time students who graduate within 150% or 200% of the normal time for completing the program, may also be included.

III. FOR INFORMATION ONLY

A. COHORT DEFAULT RATES

As a result of the most recent reauthorization of the Higher Education Opportunity Act 2008, changes were made to the time frames used to calculate institutions' cohort default rates (CDR). In the past, the U.S. Department of Education has used a two-year time frame in its calculation. However, under the new provisions an institution's CDR is calculated as the percentage of the borrowers in the cohort who default before the end of the second fiscal year following the fiscal year in which the borrowers entered repayment. This represents a one year extension of the current default monitoring period. The FY 2009 cohort (borrowers who entered repayment between October 1, 2008 and September 30, 2009) will be the first CDR calculation using the new standard. Thus, an institution's FY 2009 three-year CDR will be the percentage of its borrowers who were included in the 2009 cohort who subsequently default on or before September 30, 2011. Draft rates will be provided to institutions in February of 2012 with official rates released in September of 2012. For more information, visit the U.S. Department of Education's Web site at www.FSADataCenter.ed.gov.

In anticipation of having to comply with the new three-year cohort default standard, the Council reviewed options and strategies to help ACICS institutions remain in compliance. The Council has requested all institutions with cohort default rates approaching thresholds of non-compliance to submit Default Improvement Plans this spring. Institutions are also encouraged to review the informational resources and default prevention and management strategies available from ACICS and the U.S. Department of Education. The Council will closely monitor CDR rate changes, and continue to develop and deliver resources on default prevention. If you have any questions, please contact Ms. Sarah Sober ssober@acics.org.

B. ACICS WEB SITE

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

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

C. 2012 WORKSHOP SCHEDULE

Workshop/Webinar	Date	Location
Accreditation Workshop	May 17, 2012	Phoenix, Arizona
Evaluator Webinar	May 25, 2012	On-Line
AWARE Webinar	June 1, 2012	On-Line
Accreditation Workshop	June 5, 2012	Coeur d' Alene, Idaho
Accreditation Workshop	June 19, 2012	Las Vegas, Nevada
Initial Accreditation Workshop	June 19, 2012	Las Vegas, Nevada
Distance Education Workshop	June 19, 2012	Las Vegas, Nevada
Accreditation Workshop	July 24, 2012	Aventura, Florida
Evaluator Webinar	July 27, 2012	On-Line
Accreditation Workshop	August 22, 2012	ACICS Office
CEP/CAR Workshop	August 23, 2012	ACICS Office
Accreditation Workshop	August 24, 2012	ACICS Office
AWARE Webinar	September 14, 2012	On-Line
Accreditation Workshop	September 20, 2012	ACICS Office
Accreditation Workshop	September 21, 2012	ACICS Office
Evaluator Webinar	September 28, 2012	On-Line
Accreditation Workshop	October 9, 2012	Dallas, Texas
Initial Accreditation Workshop	October 9, 2012	Pasadena, California
Accreditation Workshop	October 18, 2012	Kansas, Missouri

D. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Friday, July 6, 2012**. All other materials for review during the August 2012 Council Meeting should be submitted by **Friday, July 13, 2012**.

E. PUBLIC PARTICIPATION

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

F. ACICS AWARE WEBINARS

The AWARE webinar will be held on Friday, June 1, 2012. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Ms. Terron Sales at tsales@acics.org.

G. CAMPUS-LEVEL AND PROGRAM-LEVEL STANDARDS

In December 2011, the Council approved the changes described below in the existing, current campus-level student achievement standards and the proposed, new program-level student achievement standards. These changes are based upon statistical information derived from the 2011 Campus Accountability Report (CAR). The statistics for retention rates are: Average Rate = 72%, Standard Deviation = 10 and the statistics for placement rates are Average Rate = 70%, Standard Deviation = 12. These standards will be reviewed by the Council each year in light of updated statistical information from the latest CAR. Program-level standards have been established on the basis of same averages and standard deviations as the campus-level standards in order that they complement the campus-level standards for student outcomes of all programs and function as a floor below which no individual program may fall.

Starting with the 2013 CAR, Council proposes to apply standards derived from the 2013 CAR data.

ACICS will begin implementation of the program improvement	STATISTICAL METHOD¹	RETENTION RATES²	PLACEMENT RATES³	LICENSURE PASS RATES⁴
--	---------------------------------------	------------------------------------	------------------------------------	---

planning requirement for all program-level standards in 2012. The new campus-level standards and other program-level compliance standards will be applied in 2013 to data collected in the 2012 CAR.				
CAMPUS -LEVEL⁵				
• Improvement	<i>Average minus ½ SD</i>	67%	64%	NA
• Monitoring	<i>Average minus 1 SD</i>	62%	58%	NA
• Compliance	<i>Average minus 2 SD</i>	52%	47%	NA
PROGRAM-LEVEL⁶				
• Improvement	<i>Average minus 1 SD</i>	62%	58%	60%
• Compliance	<i>Average minus 2 SD</i>	52%	47%	40%

1. METHOD – Based upon 2011 CAR Reports. To be reviewed each year based on annual CAR reports.
2. RETENTION –The Campus-level Improvement Standard represents an increase of 7 percentage points over the current standard of 60%.
3. PLACEMENT – The Campus-level Improvement Standard represents a decrease of 1 point from the current standard of 65
4. LICENSURE PASS – Currently ACICS has no standards for licensure pass rates. The new Licensure Pass Rates standards are 60/40%. These standards are based upon the average – 1 or – 2 standard deviations for the majority of fields, although some fields have lower statistics. 40% would not override a pass rate standard for compliance set by the respective state or national licensing agency.
5. CAMPUS-LEVEL REQUIREMENTS – Campus-level **Improvement** = required improvement plan in CEP; **Monitoring** = in addition a required workshop or consultation; **Compliance** = show cause & clock starts on established timeframe to come into compliance or be subject to final adverse action. **Campus-Level student**

achievement review requires prior approval (via a waiver request) for new programs or campuses.

6. PROGRAM-LEVEL REQUIREMENTS – Program-Level **Improvement** = required improvement plan in CEP; **Compliance** = receives notice of sanction and timeframe, tracking &, if necessary, program approval is withdrawn and teach out plan is required. **Program-level student achievement review** does not require prior approval (via a waiver request) for new programs or campuses.
7. IMPLEMENTATION **(of each level and phase)**
 - o Current campus-level standards will be implemented in 2012. New campus-level standards in 2013.
 - o New program-level improvement standards (improvement plan in CEP) implemented in 2012.
 - o New program-level compliance standards (timeframe for compliance or show cause/special visit) implemented in 2013.

NOTE: The Council proposes that beginning with the 2013 reporting year, the student achievement standards to be applied that year will be determined by the statistical standards described above, calculated on the basis of the data submitted in that year’s Campus Accountability Report. The advantage of this approach is that there will be no lag in time between the calculation and the application of the standards, so the standards will reflect the current statistical profile of retention, placement and licensure pass rates at ACICS-accredited institutions.

The Council invites comments and suggestions on whether the disadvantage of not knowing in advance the exact value of the student achievement standards to be applied to student achievement outcomes in a particular year is outweighed by the advantage of knowing that, at a time when institutional performance can change significantly from year to year, the standards to be applied will reflect the collective performance of ACICS-accredited institutions during the current year rather than during the previous year.

H. GUIDELINES FOR EVALUATING ASSIGNMENT OF CREDIT HOURS FOR FEDERAL FINANCIAL AID

In April 2012, the Council approved the following guidelines for institutions and for evaluators for compliance with the new USDOE regulations regarding the definition of credit hours and clock-to-credit hour conversion ratios.

GUIDELINES FOR COMPLIANCE WITH U.S. DEPARTMENT OF EDUCATION REGULATIONS RELATED TO THE DEFINITION OF A CREDIT HOUR AND CLOCK TO CREDIT HOUR CONVERSION RATIOS TO BE USED FOR PURPOSES OF AWARDING FEDERAL FINANCIAL AID	
GUIDELINES FOR INSTITUTIONS	GUIDELINES FOR EVALUATORS
POLICIES	<ul style="list-style-type: none"> • Are written campus credit hour policies

	<p>available?</p> <ul style="list-style-type: none"> • Are they accurate as far as describing the federal definition of credit hour, the clock-to-credit hour conversion ratios, and the programs to which they apply? • Do they meet or exceed the minimum standards in the definition in 34 CFR 600.2 and the conversion ratios in 34 CFR 668.8(k) and (l)?)
<p>Written policies describing the assignment of credit. If applicable for awarding of federal financial aid at Title IV participating institutions, the policies must refer to or include:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Federal definition of a credit hour, <input type="checkbox"/> The ACICS determination of reasonable credit hour equivalencies for labs (clinicals or studios) and practica (internships or externships), and <input type="checkbox"/> The Federal clock-to-credit conversion ratios, if applicable. <p>To avoid possible confusion, the policies might also describe other methods utilized by the institution for assigning credit, where applicable, including:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Federal definition of clock hour programs, <input type="checkbox"/> Relevant state policies, <input type="checkbox"/> The ACICS academic credit hour definition, and <input type="checkbox"/> The programs to which each of these policies apply. 	
<p>GUIDELINES FOR INSTITUTIONS</p>	<p>GUIDELINES FOR EVALUATORS</p>
<p>PROCEDURES</p>	<ul style="list-style-type: none"> • Are written campus procedures available? • Are they accurate and reliable, as a means of implementing the federal definitions of a credit hour and clock-to-credit conversion ratios? • Do they conform to commonly accepted practice in higher education? • If not, is there evidence that learning

	<p>outcomes of these procedures are equivalent to those resulting from common practice in higher education.</p>
<p>Written procedures for implementing the policies must be published for employees and made available on request, including the following information:</p> <ul style="list-style-type: none"> <input type="checkbox"/> The process(es) utilized to develop the curriculum for each program, including out-of-class assignments <input type="checkbox"/> A schedule of classes, including the number of class hours for each course and the amount of time scheduled for each class hour <input type="checkbox"/> Procedures to ensure that the number of in-class and out-of class work hours will meet or exceed Federal regulations. 	
<p>GUIDELINES FOR INSTITUTIONS</p>	<p>GUIDELINES FOR EVALUATORS</p>
<p>SYLLABI</p>	<ul style="list-style-type: none"> • Do course syllabi describe how these policies and procedures are applied? • Do the course syllabi meet or exceed the minimum standards in the definition in 34 CFR 600.2 and the conversion ratios in 34 CFR 668.8(k) and (l)? • [Evaluators might review a sample of syllabi of required courses in each program, if ACICS provides guidance for selecting the sample, as prescribed above.] • [Evaluators might review a sample of homework assignments within each syllabus, following similar guidance from ACICS.] • [Evaluators might utilize checklists in the team report template to evaluate the minimum standards, as described below.]

	<ul style="list-style-type: none"> • [Evaluators do not need to review out-of-class assignments for labs or externships, only lecture classes.]
<p>CREDIT HOUR COURSES</p> <p>Campus policies and procedures to use the Federal definition of a credit hour included in 34 CFR 600.2 for purposes of awarding Federal financial aid must be applied to each course through a syllabus which describes:</p> <ul style="list-style-type: none"> ❑ an amount of work – student work, including out of class work, must be assigned and described ❑ represented in intended learning outcomes – the intended learning outcomes of the student work must be relevant to program and course objectives ❑ verified by evidence of student achievement – the assignments must be evaluated and incorporated into the overall grade for the course, as evidenced by the instructor’s grade book or, if homework is not evaluated separately from other evaluations, with copies of several evaluations demonstrating how student achievement supported by outside work is incorporated into the evaluation. ❑ an institutionally established equivalency that reasonably approximates (for each credit hour) <ul style="list-style-type: none"> ○ not less than one hour of classroom or direct faculty instruction each week for 15/10-12 weeks ○ & a minimum of two hours of 	

out of class student work

The syllabus should state the number of hours students are expected to spend on the out of class assignments each week

- The syllabus should include out of class assignments that conform to commonly accepted practice in higher education
- The equivalent to out-of-class work for on-line classes should conform to commonly accepted practice in higher education, the total number of hours of work expected of the student should meet or exceed the Federal definition, the additional work should be relevant to the intended learning outcomes of the course, and the learning that results from the equivalent of the out-of-class work should be incorporated into the overall grading scheme.
- or an equivalent amount of work over a different amount of time. This equivalency might be demonstrated in terms of conformity with commonly accepted practice in higher education or comparability of learning outcomes.
- Or at least an equivalent amount of work to that required for classroom and out of class work **for other academic activities** as established by the institution, including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours. ACICS interprets the equivalency of one hour of classroom plus two hours of out of class work within the

<p>framework of acceptable institutional practices at comparable institutions of higher education for similar programs as meeting or exceeding two hours of laboratory work, studio or clinical, and three hours of internship, practicum or externship. Additional out of class work may be assigned but is not required.</p> <p><input type="checkbox"/> The syllabus must include or refer to a schedule of classes for the course, including the amount of time scheduled for each class. Note that a 50 minute lecture class period will be considered a reasonable approximation to one class hour, since it conforms to commonly accepted practice in higher education. For example, a full-time course load should include at least 12-15 class hours plus a minimum of 24 to 30 hours of homework assignments, for a total of 36-45 assigned hours of work each week.</p>	
<p>CONVERSION RATIOS</p>	<ul style="list-style-type: none"> • Evaluators will review syllabi for clock-to-credit courses as usual, but will review out-of-class assignments only for those courses where these assignments are included in the calculation of total credit hours, per the new conversion ratios.
<p>Campus policies and procedures to use the Federal definition of conversion ratios included in 34 CFR 668.8(k) and (l) for purposes of awarding Federal financial aid must be applied to each course through a syllabus which describes:</p> <p><input type="checkbox"/> an amount of work – student work, including out of class work, must be</p>	

<p>assigned and described</p> <ul style="list-style-type: none"> <input type="checkbox"/> represented in intended learning outcomes – the intended learning outcomes of the student work must be relevant to program and course objectives <input type="checkbox"/> verified by evidence of student achievement – the assignments must be evaluated and incorporated into the overall grade for the course, as evidenced by the instructor’s grade book or, if homework is not evaluated separately from other evaluations, with copies of several evaluations demonstrating how student achievement supported by outside work is incorporated into the evaluation. <input type="checkbox"/> The institution’s student work outside of class combined with the clock hours of instruction meet or exceed the following numeric requirements: <ul style="list-style-type: none"> <input type="checkbox"/> A semester hour and a trimester hour must include at least 37.5 clock hours of instruction; <input type="checkbox"/> A quarter hour must include at least 25 clock hours of instruction <input type="checkbox"/> And the clock hours of instruction alone meet or exceed the following numeric requirements: <ul style="list-style-type: none"> <input type="checkbox"/> A semester hour must include at least 30 clock hours of instruction; <input type="checkbox"/> A trimester hour must include at least 30 clock hours of instruction; and <input type="checkbox"/> A quarter hour must include a least 20 hours of instruction. <input type="checkbox"/> Therefore, the clock hours of out-of-class 	
---	--

student work may equal 0% to 25% of the total clock hours of instruction that are converted to credit hours for purposes of awarding financial aid.

- The syllabus must include or refer to a schedule of classes for the course, including the amount of time scheduled for each class. Note that a 50 minute lecture class period will be considered a reasonable approximation to one class hour, since it conforms to commonly accepted practice in higher education.
- The syllabus should state the number of hours students are expected to spend on the homework assignments each week.
- The syllabus should include homework assignments that conform to commonly accepted practice in higher education.

IV. COMMENT FORM – PROPOSED CRITERIA REVISIONS

ACICS ID Code: _____ Date: _____

Name of
Organization: _____

Address : _____

Please check (as appropriate):

Proposed *Accreditation Criteria* revisions:

- Program Compliance Warning
[] Accept as Written [] Modify (please explain)
- Professional Master’s Degree
[] Accept as Written [] Modify (please explain)
- Electronic Transcripts
[] Accept as Written [] Modify (please explain)
- Definition of Distance Education
[] Accept as Written [] Modify (please explain)
- Definition of Campus Effectiveness Plan Elements
[] Accept as Written [] Modify (please explain)
- Implementation of Campus-Level and Program-Level Standards
[] Accept as Written [] Modify (please explain)

Prepared by: _____

Title: _____

Signature: _____

Please respond by Friday, July 6, 2012 to:

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