MEMORANDUM TO THE FIELD
SEPTEMBER 2018

TO:    ACICS-Accredited Institutions and Interested Parties
FROM: Accreditng Council for Independent Colleges and Schools
DATE: September 13, 2018

The Memorandum to the Field contains proposed and final Criteria changes, along with other information for ACICS-Accredited Institutions and Interested Parties

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Proposed changes are reconsidered for final approval and implementation at the Council’s next meeting and will incorporate the perspectives shared by the field. Public comment on these revisions is requested through the ACICS Comment Survey explained at the end of the memorandum. ACICS requests comments and recommendations from a broad cross section of ACICS stakeholders, including students, faculty, school administrators, policy advocates, and other interested parties.

1. Proposed Criteria Revisions

Evaluations of Offerings below 300 Hours

Explanation of Proposed Change:
At its most recent meeting in August, the Council reviewed the following area, and approved the revisions as proposed for feedback from the field. The following language has been proposed to classify, for evaluation, short program/course offerings at institutions that are under 300 clock hours. Given that this entire proposal is new language, the underline has not been added.

3-1-506. Occupational and Avocational Programs. The evaluation of these programs, as defined in the Glossary, will be consistent with the guidelines of Appendix M.

GLOSSARY:

Occupational short-term programs. Programs that are less than 300 hours (≤299) and lead to an academic credential and/or licensure.
Avocational short-term programs/courses. Programs/Courses that are less than 300 hours but do not lead to an academic credential; rather, they are for preparation, enhancement, or continuing education.

Appendix M Guidelines for Occupational and Avocational Programs and Courses

Occupational Programs
The offering of programs with occupational objectives requires the review and approval of ACICS consistent with the procedures of Sections 2-2-105 and 2-2-120. As defined, these programs would be included within the scope of the campus’s approval or institution’s accreditation, and therefore subject to the following expectations of review to assure academic quality.

Evaluation of Occupational Programs

Admissions and Tuition
An admissions policy, appropriate to the scope and outcomes for the program, must be established and published, with consistent application to similar students. Tuition and any applicable fees must be reasonable for the program with notice to students of any changes as well as any balances due at the time of completion.

Program Oversight & Instruction
Evidence must be maintained to demonstrate that the program has qualified oversight and instructors in the area of study to assure adequate preparation to the students. The program must meet all state or licensing requirements for instruction, licensure preparation, and outcomes.

Student Achievement Outcomes
Retention, placement, and licensure pass rates, if applicable, will be evaluated consistent with the guidelines of Appendix K. The programs must also be included in the campus’s effectiveness plan for evaluation of each required element.

Avocational Programs/Courses
These programs and/or courses does not require ACICS approval except if required by the state or other licensing/oversight body. Further, these programs and/or courses may only be disclosed in the catalog and other publication/media with clear notice to students and other interested parties that they are not approved by ACICS as part of the institution’s accreditation and are offered for the sole purpose of continuing education, professional development, or preparation.
2. Final Criteria Changes

At its most recent meetings in August, the Council reviewed the following area, and approved the revisions as final for incorporation into the revised Accreditation Criteria (new language is underlined, deleted language is struck through).

A. Minimum Eligibility – Programs with no enrollment

Explanation of Changes:
The Council approved the removal of procedural language regarding the minimum eligibility of an institution that may be seeking accreditation but has a program with no enrollment. The program would not be reviewed for consideration as part of the initial application.

Section 1-2-100(e) – Minimum Eligibility Requirements

To be eligible for consideration for accreditation, an institution or entity must satisfy the following minimum requirements.

(e) ... It shall have a sufficient number of graduates from a majority of its programs to enable ACICS to assess the educational effectiveness of those programs. Programs offered at any credential level from which there are no graduates will be reviewed in accordance with Section 2-2-107.

B. Financial Reporting

Explanation of Changes:

The Council approved language which clarified that the Annual Financial Report (AFR) dates, as well as those on other financial reports, should align with the institution’s financial year.

Section 2-1-802. Annual Financial Report. The Annual Financial Report must be submitted on Council forms and be certified by an officer or stockholder of the corporation. Data reported must align with an institution’s fiscal year and must be submitted separately for each campus included in the institution’s grant of accreditation. It is due no more than 180 days after the end of the institution’s fiscal year. Failure to submit the Annual Financial Report in a timely manner will result in the revocation of accreditation.

Section 2-1-803. Compliance Audits and Audited Financial Statements. Title IV compliance audits and audited financial statements, certified by an independent certified public accountant, are essential instruments in the determination by ACICS of an institution’s compliance with Title IV requirements and financial stability. All institutions are required to submit audited financial statements within 180 days of the end of their fiscal year, and the statements must represent the institution’s fiscal year. All institutions that participate in the Title IV program are required to submit the compliance audit within 180 days of the end of their fiscal year. This audit must also represent the institution’s fiscal year, as required by U.S. Department of Education regulations.
C. Student Achievement

Explanation of Changes:

The Council approved additional language to the student achievement standards, in consideration of best practices in the industry that are aligned with its expectations. The additional language gives consideration to extenuating circumstances during the review of a campus’s data relevant to student achievement on the Campus Accountability Report (CAR). Recognizing that there may be external factors, beyond the control of the campus, which severely impact its ability to maintain compliance with outcomes, the Council will provide an opportunity for these campuses to submit substantive evidence of the direct relationship for its review. The campus would also have to demonstrate, through other direct and indirect indicators, that students have achieved the outcomes of the program. This final change will be effective for implementation beginning with the 2019 CAR which will be submitted on November 1, 2019.

In addition, the Council also proposes language which further clarifies its expectations for the review and actions on reported licensure pass rates, when needed for employment. The proposed language will defer to any action taken by the oversight agencies’ in their focused review of the outcomes in the programs where licensure/registration/certification is required for employment. In its review of the differing roles of these agencies across states and industries, the Council determined that its monitoring and incorporation of licensure outcomes as part of its overarching consideration of student achievement review would be more appropriate and consistent with other accrediting agencies.

2-1-809. Student Achievement Review. The Council reviews the Campus Accountability Report (CAR) to monitor performance in terms of student achievement at both the campus and program levels. Measures will include retention, placement, and licensure or certification examination pass rates, if applicable. When this review indicates that the achievement of an institution’s students is below benchmark, the Council, at its discretion, will take action consistent with the guidelines outlined in Appendix L, Student Achievement Standards and Campus Accountability Reports.

APPENDIX L

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STUDENT ACHIEVEMENT STANDARDS

Student achievement standards outlined below apply to retention and placement rates at the campus and program levels, and licensure or certification examination pass rates, where applicable, at the program level. Minimum standards are intended to ensure that a substantial majority of students at ACICS-accredited campuses are retained, pass licensure or certification examinations where applicable, and find appropriate employment. Consideration will be given to extenuating circumstances in relation to local, state, or national requirements or trends; student population; program length; graduates pending the completion of licensure or certification exams; economic or cultural factors; or any other reasonable circumstances impeding an institution’s ability to meet or exceed the established compliance standard. However, the institution must also submit documented evidence of student learning through other appropriate indicators.

<table>
<thead>
<tr>
<th>Campus-Level Student Achievement Elements (Effective 2013 Reporting Year)</th>
<th>Standard</th>
<th>Benchmark*</th>
</tr>
</thead>
</table>

### Retention Rate
- Program length equal to or less than one (1) year: 60%
- Program length equal to or more than one (1) year: 70%

### Placement Rate
- 60%

### Program-Level Student Achievement Elements (Effective 2013 Reporting Year)

<table>
<thead>
<tr>
<th>Standard</th>
<th>Benchmark*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Retention Rate</td>
<td>60%</td>
</tr>
<tr>
<td>Placement Rate</td>
<td>60%</td>
</tr>
</tbody>
</table>

*Licensing Examination Pass Rates, where applicable**

- 60%
- 65%
- 70%

*A campus and/or program whose rates fall below the Benchmark must develop and implement an Improvement Plan.*

**Standards apply to programs for which licensure or certification is required to practice in the specific career field. The program is required to meet any higher licensure or certification agency standards.*

^*The Council also will consider any conditions or negative actions from other oversight agencies, as well as additional student achievement indicators when taking an action.*

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### D. Date of Revocation Following a Campus Closure

#### Explanation of Proposed Changes

*The Council approved language to clarify that an institution's grant of accreditation or a campus' inclusion in an institution's grant of accreditation will be revoked effective the last date of academic activity/instruction, not the final day of administrative operations (the date a campus finally closes its doors), since academic activity is required for accreditation. This correlates with the date that an institution reports to the Department of Education for Title IV purposes.*

*The revision would also clarify that the accreditation of a summarily suspended institution would be revoked effective a date later than its actual closure, should the institution provide information (not a petition indicating that it has not closed) as to its actual closure date.*

#### 2-2-301. Closing of a Main Campus

An institution is required to notify ACICS as far in advance as possible when it plans to cease operation. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The institution’s grant of accreditation will be revoked effective its final date of academic activity as of the effective date of closing.

When ACICS receives information from any source that an institution has ceased to operate, it shall immediately take steps to verify the information. If the Council believes
that the institution, in fact, has ceased operations, the grant of accreditation is summarily suspended. Such action is authorized without prior notice or hearing and with immediate public notice.

The institution shall be notified of the summary suspension in writing at its address of record. Within 10 days after receipt of the suspension notice, the institution may petition ACICS for an expedited determination of whether such suspension should be withdrawn. If no petition is filed within 10 days, the suspension automatically shall become a revocation effective as of the date of notice of suspension. Alternatively, should the closed institution provide ACICS with information regarding its final date of academic activity, the suspension shall become a revocation effective as of the date provided by the institution.

2-2-302. Closing of a Nonmain Campus. An institution is required to notify ACICS as far in advance as possible when it plans to close a nonmain campus. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The nonmain campus will cease to be included in the institution’s grant of accreditation effective its final date of academic activity as of the effective date of the closing.

2-3-401. Revocation. Revocation occurs without a hearing for any of the following reasons:
(a) An institution or campus notifies the Council that it has closed and/or ceased operation.
(b) An institution or campus fails to submit a written response to a show-cause directive by the indicated due date.
(c) An institution or campus whose accreditation has been summarily suspended does not challenge or appeal the suspension within 10 days of receipt of the suspension notice. (See Section 2-2-301.)
(d) The institution or campus fails to file an annual report as required by the Council. (See Sections 2-1-801-2-1-802.)
(e) The institution or campus fails to pay its annual fees, application fees, other assessed fees, or evaluation expenses. (See Section 2-1-804.)

E. Voluntary Withdrawal
Explanation of Changes:

The Council approved the addition of language to formalize the process that should be employed when an institution wishes to voluntarily withdraw its accreditation or the inclusion of one of its branches from within its accreditation status from ACICS. This language provides the necessary actions to be taken by the institution seeking to withdraw and the subsequent revocation action that would be taken by the Council upon withdrawal.

2-2-700 – VOLUNTARY WITHDRAWAL

If an institution seeks to voluntarily withdraw from its grant of accreditation by ACICS, or the inclusion of one or more of its nonmain campuses from within its grant of
accreditation, it must submit written notice to ACICS of its request. The notice must be
signed by the chief executive or administrative officer of the institution, and indicate the
requested date of effect. The institution’s grant of accreditation will be revoked as of the
effective date, or retroactive to the date that all outstanding obligations, including payment
of fees, had previously been fulfilled by the institution.

2-3-401. Revocation. Revocation occurs without a hearing for any of the following
reasons:

(a) An institution or campus notifies the Council that it has closed and/or ceased
operation.

(b) An institution notifies the Council that it is voluntarily withdrawing its grant of
accreditation or the inclusion of one or more of its nonmain campuses from within its
grant of accreditation.

(c) (b) An institution or campus fails to submit a written response to a show-cause
directive by the indicated due date.

(d) (c) An institution or campus whose accreditation has been summarily suspended does
not challenge or appeal the suspension within 10 days of receipt of the suspension
notice. (See Section 2-2-301.)

(e) (d) The institution or campus fails to file an annual report as required by the Council.
(See Sections 2-1-801-2-1-802.)

(f) (e) The institution or campus fails to pay its annual fees, application fees, other
assessed fees, or evaluation expenses. (See Section 2-1-804.)

A revocation action is not appealable. It requires an institution to start anew and to undergo
the entire accreditation process to regain accreditation.

ARTICLE VI
Membership, Fees, and Meetings

Section 2−Loss of Membership. Any member that ceases to be accredited by ACICS shall
automatically, and without the necessity for further action, be deemed to be removed from
membership. Members may voluntarily resign pursuant to the procedures
described in 2-2-700, which also results in a revocation loss of accreditation. All
obligations owed to ACICS, including payment of fees, shall be fulfilled prior to
resignation. The loss of accreditation shall be retroactive to the date that all outstanding
obligations had previously been fulfilled, if applicable.
3. For Information Only

A. Adjustment of Late Fees
The Council outlined procedures for its Bylaws, Article VI Membership, Fees, and Meetings, Section 3 – Types of Fees, to advise the membership how on late payments and submissions of Council-directed items will be penalized:

Late fees will apply to all reports and applications, responses to on-site evaluation reports, invoices and fees, as well as any other Council directive with a specific deadline. An initial late fee of $1,000 will be assessed the day following the deadline (first day late), and then a $100 per day will be accrued until day 20 of being delinquent. On day 21, the institution will be presented before the Executive Committee who may issue a show-cause directive.

B. Learning Sites
Effective January 1, 2017, the Council approved a change in the definition of a learning site as outlined in Section 1-3-103 of the Accreditation Criteria, which stipulated that learning sites must be located within five miles of the oversight campus or otherwise approved by the Council on a case-by-case basis. Institutions were given until January 1, 2018, to come into compliance with the new definition.

ACICS has sent communications to those identified as having active learning sites that do not meet the current definition. This communication requires institutions to respond to the Council concerning the closure, designation to branch status, or petition to keep the learning site active with substantive rationale no later than Friday, October 19, 2018. Failure to respond by the indicated deadline may result in a conditioning or adverse accreditation action against the institution.

C. CAR/PVP Webinars
In preparation for the submission of the 2018 Campus Accountability Report (CAR) on November 1, 2018, ACICS will be hosting webinars to provide information and guidance to appropriate institutional representatives. Invitations to these sessions will be sent out separately and will be sent to the campus email and primary contacts. Please be advised.

D. Renewal of Accreditation Workshop
With a number of institutions scheduled to undergo the renewal of accreditation review process within the coming year, ACICS will be offering a Renewal Accreditation Workshop on Friday, November 9, 2018, at its offices in Washington, DC. Registration information is posted on the website and can be found here: November 2018 Renewal of Accreditation Workshop
4. Comment Survey – Proposed Criteria Revision

The Council encourages students, faculty, administrators, evaluators, employers, and other interested parties to provide feedback regarding proposed revisions to Council policies and procedures. Comments on the proposed Criteria addition are due by **Friday, November 2, 2018**. ACICS is collecting all comments from the field on proposed Criteria revisions through an electronic survey. Please find the survey link below:

[https://www.surveymonkey.com/r/AUG18M](https://www.surveymonkey.com/r/AUG18M)

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In preparation for the scheduled AWARE Webinar on **September 20, 2018**, to discuss these proposed changed and informational procedures, please send your questions to [kzeigler@acics.org](mailto:kzeigler@acics.org) to ensure that we are able to provide as much guidance as possible.

For any other questions or to provide policy comments, please contact:

Ms. Karly Zeigler  
Manager of Policy and Institutional Compliance  
[kzeigler@acics.org](mailto:kzeigler@acics.org)