MEMORANDUM TO THE FIELD
February 2022

TO: ACICS-Accredited Institutions and Interested Parties
FROM: Accrediting Council for Independent Colleges and Schools
DATE: February 22, 2022

This Memorandum to the Field contains final criteria changes to the Accreditation Criteria from the Council’s November 2021 and January 2022 meetings, along with other information for ACICS-accredited institutions and interested parties.

Contents
Final Criteria Revisions ................................................................. 2
  Unannounced and Inquiry Visits.................................................. 2
  Distance Education .................................................................... 4
  Community Resources.............................................................. 8
  General Education .................................................................... 9
  Review Board of Appeals Members ......................................... 10
For Information Only .................................................................... 11
  Semi – Annual Campus Accountability Report.......................... 11
  Renewal of Accreditation Application Materials........................ 11
  Demonstration of Student Learning Outcomes.......................... 11
  Annual Financial Reports.......................................................... 11
  Workshops ................................................................................ 11
  ACICS Learn ............................................................................ 11
  Call for Evaluators .................................................................... 12
AWARE Webinar – Final Criteria Revisions................................... 12
Final Criteria Revisions

At its November 2021 and February 2022 Council Meeting, the Council reviewed feedback from the field regarding any proposed language revisions posted in the May 2021 Memo to the Field, as well as editorial changes to provide further clarity. The ACICS Accreditation Criteria has been updated to reflect all final criteria revisions with a publication date of February 22, 2022. To review the revised copy of the Accreditation Criteria please visit the ACICS website at www.acics.org > Accreditation > Criteria.

The following criteria have been accepted by the Council as **final**, effective immediately (new language is **underlined** and deleted language is **struck**).

Unannounced and Inquiry Visits

Explanation of Final Changes

The following areas for revision were reviewed as part of ACICS’s systematic review for accuracy and currency of the Accreditation Criteria. The revisions clearly identify the two types of visits that may be directed by ACICS, as well as the general procedures for unannounced or inquiry (previously referred to as both “special” or “FACT”) visits. These visits are typically conducted as a mechanism to provide further information to the Council when concerns arise.

2-1-805. Unannounced or Inquiry Visits. The Council **ACICS**, at its discretion, may direct an unannounced or inquiry visit **to** an institution at any time. Procedures for unannounced **such** visits are described in Appendix B.

...  

2-3-800 - **SPECIAL AND FACT UNANNOUNCED AND INQUIRY VISITS**

ACICS staff, with delegated authority from the Council to do so, reserve the right to initiate **special** on-site evaluation visits to or request specific reports from an institution at any time, both of which are to be completed under conditions and within a time frame determined by ACICS. **Refusal of an institution’s refusal** to respond to or cooperate with such requests shall be grounds for suspension of its grant of accreditation.

At any time ACICS has substantive evidence or information that an institution’s is in jeopardy of having its eligibility status with a federal or state agency or its accreditation status with another accrediting agency conditioned, ACICS may direct a **special** on-site evaluation visit to that institution. The purpose of the visit will be to ensure that the **education of** students in the institution are **not being harmed adversely affected educationally** because of the institution’s alleged noncompliance with federal or state statutes or regulations or another accrediting agency’s standards and criteria.

**ACICS may direct a Fast Assessment and Compliance Team (FACT) visit to investigate and report on alleged improper practices at ACICS institutions.**
ACICS retains discretion to determine the size and composition of such special and FACT visit teams and
the length and breadth of the evaluation. In making these decisions, the Council ACICS will consider the
issues and factors that prompted the visit, the size of the institution, and the nature of the institution’s
offerings.

Appendix B – Unannounced and Inquiry Visits

UNANNOUNCED VISIT FACT SHEET
The Council, at its discretion, ACICS may direct an unannounced visit to an institution about which it has
received adverse information or when general operations of the institution may be called into question.
This Fact Sheet is designed to assist the institution and the visiting team in conducting this visit as
smoothly and efficiently as possible.

VISIT PROCEDURES
The purpose of this such a visit is to review records, interview students and staff, and, if applicable,
review previously cited problem areas and verify responses to previous requests for information, such as
complaints. The team may consist of a staff member, an experienced evaluator(s), or both. Expect the
team to spend the full day at your institution.

Upon arrival, the team will ask to speak with the chief on‐site administrator. Following a brief interview,
the team is to be given a short tour of the facility, including records storage areas, and then shown to a
work room. This room could be an empty classroom or office, and it should be available exclusively for
the team for the entire visit.

The institution must make the following information available to the visiting team:
1. the most recent CAR;
2. the current catalog and addenda (if applicable);
3. the current class schedule, including names of instructors and room numbers;
4. the most recent ACICS accreditation visit team report and institutional response;
4. a copy of each government program review and compliance audit conducted within the prior two
   years and any institutional responses;
5. faculty/personnel records;
6. all student records, including admissions, academic, and financial; and
7. copies of institutional advertising.

Additional records may be requested by the team. Staff, faculty, and students will be interviewed.
Institutions are encouraged to have these records in a central location where more than one person can
access them, should the chief on‐site administrator not be present.

REPORT AND SUBSEQUENT ACTIONS
A report will be prepared and sent to the institution for response. If the institution is found to be
operating in accordance with the Accreditation Criteria, no further action will be taken. The institution
will be invited to respond within a given time frame.
The Council will review the visit report and any response from the institution. If the institution is found to be violating provisions of the Accreditation Criteria, no further action will be taken. If the Council finds the institution out of compliance, it may direct the institution to show cause why its accreditation should not be withdrawn, or it may direct that a full team visit the institution to evaluate its correction of these violations. Take an action as identified in Title II, Chapter 3.

EXIT CONFERENCE
At the conclusion of the visit, the team will meet with the chief administrator to discuss the visit and to answer any questions regarding the Council policies, procedures, and standards.

FEES
A fee will be assessed for this visit. Failure to remit payment for this fee may result in an adverse action.

INSTITUTIONAL PARTICIPATION
Any institution that refuses to undergo an on-site unannounced or inquiry visit evaluation will be directed to show cause why its accreditation should not be withdrawn by suspension.

Distance Education

Explanation of Final Changes
The changes made final to the Criteria below are supportive of the Department of Education’s new regulations surrounding distance education that became effective July 1, 2021. Among the changes are a new definition of academic engagement and substantive interaction. Additionally, the changes identify a requirement for a system of monitoring to be conducted by institutions to ensure that substantive interaction, both between faculty and students as well as among students, is taking place on a “predictable and scheduled basis.” Substantive interaction has been a long-standing expectation for distance education activity; however, the finalized language adds further clarity on the expectations to ensure institutions have formalized policies and procedures relative to their own implementation and monitoring.

2-2-106. Initiation of Distance Education (Online) or New Instructional Delivery Method. It is the responsibility of the institution to secure Council approval of the intention to initiate online delivery if all courses and programs within the institution are currently approved for residential or face-to-face instructional delivery method. Any significant change in instructional delivery method requires prior Council approval.

The institution or campus must initiate the approval process through the submission of a distance education application for Council review and approval before being included into the institution’s current scope of accreditation. Once the institution receives Council approval to initiate online delivery, a new program application can be submitted to offer a new program in that mode of delivery. If current,
residentially offered programs wish to use the newly approved online mode of delivery, notification per program is required.

... 

GLOSSARY

**Academic Engagement.** Active participation by a student in an instructional activity related to the student’s program of study, such as: attending a class; submitting an academic assignment; taking an assessment or exam; participating in an interactive tutorial, webinar, or other computer-assisted instruction; participating in a study group, group project, or online discussion; or interacting with an instructor about academic matters.

**Distance Education or Distance Learning.** A structured educational situation in which the students and instructors are physically separated. Distance education supports regular and substantive interaction synchronously or asynchronously between instructor and learner, among learners, and between learners and learning resources through one or more interactive technologies.

**Home Institution.** In a case where an institution collaborates with another entity for the delivery of distance education courses, “home institution” is the campus through which the student enrolls for the course. The Home Institution is responsible for assuring that accrediting standards are met, for providing on-campus services, and for clearly demonstrating through a formal Consortium Agreement the roles and responsibilities of the Home Institution and the Host Institution, which may deliver the distance education courses and specified online services. The Consortium Agreement must be approved by ACICS and must provide for evaluation visits to the Host Institution as may be required by ACICS.

ACICS expects the Home Institution to offer more than 50 percent of a program if courses are delivered under a distance education Consortium Agreement with an approved accredited institution, and to offer a minimum of 75 percent of a program if courses are delivered under a distance education Consortium Agreement with an approved unaccredited entity.

**Host Institution.** The institution which collaborates with an accredited institution in delivering distance education courses and specific online services as described in a formal Consortium Agreement approved by ACICS. The Consortium Agreement must provide for evaluation visits to the Host Institution as may be required by ACICS. If the Host Institution is an approved unaccredited entity, it is subject to an evaluation visit once every three years as required by ACICS.

**Hybrid Course or Hybrid Program.** A hybrid course is one that mixes face-to-face, traditional classroom instruction with online instruction. A hybrid program is one that offers or requires a percentage of the required courses in a program online. ACICS requires the school to clearly outline the percentage of online activity included in a course or a program. Institutions are required to apply for and secure approval prior to initiating any distance education activity and also when they increase their distance education activity from hybrid to fully online (see Section 2-2-106).
**Interaction.** Refers to student engagement with faculty, other students, and other participants in learning content at a level aligned with the courses offered as part of the ongoing learning process.

**Substantive Interaction.** Regular engagement of the learner through at least two of the following: direct instruction; assessment or feedback on a student’s coursework, providing information or responding to questions about the content of a course or competency; facilitating a group discussion regarding course content.

---

**Appendix H – Distance Education**

In addition to the general standards in Title III, Chapter 1, which apply to all institutions, and applicable standards in Chapters 2–6, the following standards apply specifically to distance education delivery methods. These requirements are designed to inform institutions of the policies of the Council and to guide institutional representatives when designing, implementing, and evaluating distance education forms of educational delivery.

**A. Institutional Readiness**

1. Institutions must notify ACICS and receive Council approval prior to using distance education as a mode of delivery (see Section 2-2-106).

2. The objectives which support the institution’s mission must identify the role of distance education learning within its scope and purpose (see Section 3-1-100).

3. Institutions must have a plan to implement and maintain effective distance education instruction which is integrated into the CEP (see Section 3-1-111 and Appendix K). At a minimum, the plan should include the following:
   - (a) rationale and continued value (effectiveness) of distance education to the institution’s mission;
   - (b) instructional, human, and technological resources designed to sustain distance education operations;
   - (c) course and program objectives and how they align with the institution’s mission;
   - (d) content and the distance education infrastructure, including the LMS;
   - (e) processes in place that ensure student privacy and that the student who registers is the same student who academically engages in the course.

4. The instructional delivery method must be appropriate for students and the curriculum.

5. Institutional policies and procedures should be applied consistently using procedures that are appropriate to the mode of delivery.

6. Institutions must designate a qualified person to oversee the distance education activities and to monitor student learning outcomes and the effectiveness of the mode of delivery.

**B. Admissions Requirements and Enrollment**

1. Institutions must identify the admission requirements of distance education courses/programs and, if applicable, how they differ from the on-ground admission requirements.

2. If an online admissions test is required, it must be administered in a manner which verifies the student’s identity. Institutions must make it clear in writing at the time of enrollment how the student’s identity will be verified throughout the course and program, how the student’s privacy will be protected, and if the student will be assessed any additional charges associated with the verification of student identity.
3. Institutions must clearly and appropriately state any hardware or software the students must have or have access to, or other requirements to access this mode of delivery.
4. Institutions must provide an online orientation to familiarize the student with the distance education learning process and the equipment and resources that will be used.

C. Curriculum and Instructional Delivery
1. Regardless of the instructional delivery method, the syllabi must identify the course learning objectives. Each course learning objective must support one or more program learning outcomes (see Glossary: Syllabus).
2. The course must provide sufficient and appropriate opportunities, on a predictable and scheduled basis, for substantive interaction between faculty and students and among students (see Glossary: Substantive Interaction).
3. Institutions must demonstrate to the Council that the clock or credit hours required and awarded are appropriate for the degrees and credentials offered using a thoroughly developed rationale. Credit award rationales for distance education delivery of courses or programs generally do not use the traditional lecture/laboratory/externship formulas for credit calculations (see Section 3-1-516).
4. Curriculum must be administered in a way that maintains security and stability of access.
5. Institutions must demonstrate that the student who registers for a distance education course or program is the same one who participates in and completes the course or program and receives the academic credit. The verification method, at the option of the institution, may include a secure login and pass code, proctored examinations, and other appropriate student authentication or verification technology. A policy specific to academic integrity expectations and oversight in the distance learning environment must be developed and implemented.

D. Faculty and Instructional Support
1. The institution must employ academically and/or experientially credentialed faculty to teach online courses appropriate to the subject matter.
2. Faculty hired to facilitate online instruction must be properly trained to use the institution’s LMS for purposes of instruction, communication, and assessment.
3. All staff assigned to or involved in the administration and support of the distance education activities must be clearly identified and possess the skills and experience necessary to provide the support for course development and delivery.
4. The instruction must provide an accessible and reliable LMS and technical support to effectively facilitate online instruction and learning and to ensure faculty and student success.
5. The institution must demonstrate that the student-teacher ratio appropriately supports faculty-student interaction, facilitation of interaction among students, and interaction with curriculum content.
6. The institution must have a faculty development plan on file that is appropriate for each faculty member to include professional development and/or in-service activities relevant to the online delivery method (see Section 3-1-543).
7. Faculty observations and evaluations must be conducted at least annually to assess effectiveness in the distance education environment.

E. Resources and Equipment
1. The institution must demonstrate that it has adequate financial resources to support the form of delivery.
2. The institution must demonstrate that students taking online courses have access to the same or equivalent library resources and support as students taking courses in a physical classroom. If
percent or more of the student’s program is approved for online delivery, these resources must include, at a minimum, access to a virtual library collection of program-related books, journals, and periodicals, and access to virtual library and information technology services. These resources are expected to be appropriate for the students’ needs and must be incorporated into the instructional design of the courses offered, as appropriate.

F. Students and Student Services
1. The institution must orient online students to online education, its LMS, resources, and support services, including expanded technical support expectations.
2. Student support services available to students enrolled in online programs must be the same or equivalent to those provided to students enrolled in on-ground programs, including, but not limited to, academic advising, financial aid, and employment assistance.

G. Student Evaluation and Program Assessment
1. The learning objectives for a course delivered online must be the same as the learning objectives for the same course delivered on ground.
2. Regardless of instructional delivery method, assessments and assignments should demonstrate student achievement of course learning objectives.
3. The institution must monitor students’ academic engagement and success, ensuring instructors are engaging in substantive interaction with students (see Glossary: Academic Engagement).
4. The institution must document that it conducts course/program evaluations, including assessment of student learning outcomes; student retention and placement; and student, graduate, faculty, and employer satisfaction. The institution must also evaluate the effectiveness of its distance learning activities, including the extent to which online learning goals are achieved, and use the results to enhance the attainment of established program and/or institutional goals (see Section 3-1-111 and Appendix K).

H. Publications
1. The institution must fully disclose what form(s) of instruction it uses in its catalog and on its website, and, when appropriate, in its advertising and promotional material.
2. The catalog disclosure must follow the requirements as described and outlined in Section 3-1-701 and Appendix C.
3. The institution must meet all disclosures required by state, federal, or other oversight bodies concerning the recruitment and admission of, and services to, students.

Community Resources

Explanation of Final Changes
The following revisions were made to provide further clarity on the Council expectations for Community Resources. The new language expounds on the expectation that institution’s include multiple and varied types of community resources, as well as providing further examples of such resources in the Glossary definition.

3-1-512. Program Planning.

(c) The institution must develop a policy for the use of community resources shall be varied in each program and shall be utilized to enhance student enrichment and potential career
opportunities. **Multiple and varied types of community resources shall be utilized in each program to expose students to relevant practical experiences** (see Glossary: Community Resources).

GLOSSARY

**Community Resources.** Resources and local partnerships within the community used to enrich the students’ educational experience and/or broaden career opportunities in their program of study. **Examples include** A variety of persons, organizations, or businesses that provide information, guidance, or support to a specific program of study or career opportunity, such as professional and trade associations, employers, local businesses, workshops, field trips, externships, programs advisory committees, and guest speakers.

**General Education**

*Explanation of Final Changes*

The final updates to the definitions for general education further encompass the current fields of technology and engineering. Previously these areas could have been considered under the mathematics and science field. However, as such courses have become more prevalent, the language now clearly identifies the additional areas for general studies courses.

GLOSSARY

**General Education.** Those areas of learning which are deemed to be the common experience of all “educated” persons and must include subject matter from the humanities, mathematics and the sciences, and the social sciences.

**General Education, Humanities.** Courses including, but not limited to, in-fields such as literature, philosophy, logic, foreign language, art, music, theater appreciation, and communications, including rhetoric, composition, and speech but excluding business communications and business writing.

**General Education, Mathematics, and the Sciences. Science, Technology, Engineering, and Mathematics (STEM).** Courses including, but not limited to, such as biology, chemistry, physics, geology, astronomy, information systems and digital literacy, introduction to computers, and mathematics theory and analysis, including algebra, trigonometry, geometry, calculus, and other advanced mathematics courses, but excluding business mathematics and basic computations.

**General Education, Social Sciences.** Courses including, but not limited to, such as history, economics, political science, geography, sociology, anthropology, and general psychology, but excluding courses such as practical psychology, selling techniques, and social or business behavior.
Review Board of Appeals Members

Explanation of Final Changes
The language reviewed and finalized below added context to the number of members appointed to the pool for possible selection on the Review Board of Appeals, if needed.

2-3-602. Appointment of Members. The Review Board of Appeals shall consist of a pool of not more than 15 persons, all of whom have had experience in accreditation, who are appointed to three-year terms. An appointed person shall not have been a commissioner within one year prior to appointment. The Review Board of Appeals shall consist of at least two academic representatives, two administrative representatives, and three public members, as defined in Appendix A.
For Information Only

Semi – Annual Campus Accountability Report
As a reminder, the semi-annual CAR reports are due May 1. The annual report will open on October 1 and will be due by November 1. Questions can be emailed to Ms. Michelle Edwards at CAR@acics.org.

Renewal of Accreditation Application Materials
As a reminder, institutions with a grant expiration date of December 31, 2022 must submit its application and supporting materials through the Member Center no later than April 1. ACICS staff will contact the campus director approximately 30 days prior to the visit cycle (June – September) to schedule the visit. Questions can be emailed to Ms. Karly Zeigler at keigler@acics.org.

Demonstration of Student Learning Outcomes
Institutions that have a majority of their students waived from placement reporting due to visa restrictions are required to submit alternative evidence that graduates are mastering the objectives of the program. Effective with the 2020 CAR submission, any institution that reported over 50 percent of graduate population in a program as “waived from placement due to visa restrictions” have be notified and are required to submit documented evidence of alternative measures for student learning, for each program that meets this criterion. Such evidence would include student learning assessment outcomes identified and analyzed in the institution’s Campus Effectiveness Plan. Notices have been sent for the 2021 CAR.

Annual Financial Reports
Institutions with a fiscal year end of September 2021 and December 2021 are reminded that their Annual Financial Report will be due on or before March 31, 2022 and June 30, 2022 respectively. Questions can be emailed to Ms. Michelle Edwards at afr@acics.org.

Workshops
A Renewal of Accreditation workshop has been scheduled for March 29, 2022. The Renewal Accreditation Workshop is a live virtual workshop which provides an overview of the ACICS renewal of accreditation process as well as evaluation visit preparation and procedures. Chief on-site administrators and any other individuals coordinating the accreditation process are required to attend within 18 months prior to their onsite visit. All those planning to attend must register no later than Friday, March 25, 2022.

More information and to register, please visit the Workshops page on our website: https://www.acics.org/workshops.

ACICS Learn
ACICS Learn is available on our website to offer training and professional development opportunities! ACICS has partnered with MaxKnowledge to bring our member institutions a robust roster of
coursework focusing on career education through the ACICS Online Training Center. This resource offers employee training and certification for career education institutions, with more than 200 online courses, each of which provides four hours of continuing education credits. Member institutions can receive a VIP Code for discounted pricing through their institutional email address, or by emailing info@acics.org. You can find further information by visiting the ACICS Learn tab on our website or at https://www.acics.org/about-acics-learn-1.

Call for Evaluators

ACICS evaluators play a critical role in the deliberate, thorough accreditation of institutions, ensuring quality, institutional enhancement, and adherence to ethical business and educational practices. Evaluators are needed in several content areas, from both member and non-member institutions. If you or anyone you know is interested in contributing further to enhancing higher education institutions, please visit our website to register and complete the training: https://www.acics.org/evaluators-becoming. Questions regarding becoming an evaluator can be sent to info@acics.org.

AWARE Webinar – Final Criteria Revisions

In preparation for the scheduled AWARE on Wednesday, March 2, 2022 to discuss these final changes and informational procedures, please send your questions to kzeigler@acics.org to ensure that we are able to provide as much guidance as possible.

To register for the AWARE:
https://attendee.gotowebinar.com/register/5125079204936316683

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

Ms. Karly Zeigler
Director of Accreditation
kzeigler@acics.org