Distance Education and Training Council

**Research and Educational Standards Subcommittee**

**MINUTES**

April 14, 2013
Intercontinental Mark Hopkins
San Francisco, CA


Attendees:    Connie Dempsey, Chair, Penn Foster
Cindy Mathena, Vice Chair, University of St. Augustine for Health Sciences
Mary Adams, American Sentinel University
Jerry Alley, Taft University System
Lute Atieh, American College of Technology
Debashish Banerji, University of Philosophical Research
Virginia Carlin, John Hancock University
Susan Chiaramonte, Harrison Middleton University
Jon Crispin, Columbia Southern University
John Cucio, Apollos University
Michael Curd, Harrison Middleton University
Gordon Drummond, Sessions College for Professional Design
Paul Edison, Apollos University
Susan Elliott, Gemological Institute of America
David Frame, University of Management and Technology
Robert Frankel, National Tax Training School
Natasha Franklin, California Coast University
Patrick Gamboa, International Sports Sciences Association
Leslie Gargiulo, Ashworth College
Stella Garlick, Martinsburg College
Jennifer Green, Huntington College of Health Sciences
Susan Johnson, Gemological Institute of America
Kim Kaiser, Holmes University
Stephen Kemp, Antioch School of Church Planting
Rob Klapper, Ashworth College
Nicole Lesher, Henley-Putnam University
Tom Macon, Grantham University
Shelly Marquardt, California Coast University
Robert Mayes, Columbia Southern University
Paul McDonald, American Graduate University
Joseph McGrath, Grantham University
Sal Monaco, New Charter University
Marianne Mount, Catholic Distance University
Wanda Nitsch, University of St. Augustine for Health Sciences
Stanley Paris, University of St. Augustine for Health Sciences
Jessica Park, Abraham Lincoln University
Dorene Petersen, American College of Healthcare Sciences

Marianne Mount, Catholic Distance University
Jack Nill, Global University
Christopher Reeves, Shiloh University
Caroll Ryan, California Southern University
Marie Sirney, American Graduate University
Karen Smith, Columbia Southern University
Robert Strouse, Taft University System
Patrick Stuart, Art Instruction Schools
Murl Tucker, California Coast University
Judith Turner, Art Instruction Schools
Dawn Turco, Hadley School for the Blind
Roy Winter, Abraham Lincoln University

DETC Staff:       Leah Matthews, Executive Director
Michael P. Lambert, Executive Director Emeritus
Sally R. Welch, Associate Director
Nan Ridgeway, Director of Accreditation
Tim Mott, Chair, DETC Accrediting Commission

I.     **Call to Order:** The meeting was called to order by Chair Connie Dempsey at 1:30 p.m. on Sunday, April 14th, in the Room of the Dons at the Intercontinental Mark Hopkins. The meeting was held in conjunction with DETC's 87th Annual Conference, April 14-16, 2013.

II.    **Welcome and Self-Introductions** – Ms. Connie Dempsey opened the meeting and welcomed participants. Participants introduced themselves.

III.   **Introducing the New Executive Director:** Dr. Leah Matthews made brief remarks by reviewing her first two weeks as the Executive Director of DETC.

IV.   **Approval of October 14, 2012 Minutes** (Exhibit A): Ms. Susan Chiaramonte moved and Marie Sirney seconded a motion to accept the Minutes as distributed. The motion carried unanimously.

V.    **Old Business**

    A.    **Update on the DETC Online Courses**

Ms. Dempsey reported that since MaxKnowledge began hosting DETC's online courses in October 2012, 98 people signed up and 46 have completed Preparing for DETC Accreditation; 102 signed up and 17 have completed Evaluator Training Tutorial, and 103 signed up and 69 have completed Business Standards Tutorial. Ms. Dempsey thanked MaxKnowledge for hosting these online tutorials. Sally Welch reminded the schools that all DETC members get a discount when enrolling in MaxKnowledge's courses, and many of the courses are free. DETC's profits from the courses will be donated to the Wounded Warrior Project.

    B.    **Update on the Outstanding Graduate Program**

Ms. Dempsey reported that the 2013 Outstanding Graduates and Famous Alumni booklet has 34 graduates and 9 famous alumni write ups. For next year's program, the Notice of Intent is due September 1st and write up is due by November 1, 2013. There are 7 graduates coming to the

conference (5 outstanding graduates and 2 famous alumni) to receive their awards. Ms. Dempsey reminded everyone that the Graduate/Famous Alumni's session will be on Tuesday before lunch.

## C.     Update on U.S. Department of Education and CHEA

Mr. Michael Lambert provided an update on the petition to the DOE, an 18 month process prepared by Sally Welch. More than 100 changes were made to policies and process, with 2 minor findings, resulting in outstanding commendation. In December of 2012 the explanation on the findings was accepted and DETC is now recognized by the DOE through 2017.

In March of this year, the Committee on Recognition for CHEA voted to recommend continued recognition for 10 years. This will be voted on in May by the CHEA Board of Directors.

## D.     Update on Staff Activities

Mike Lambert reported on the introductions and meetings that have occurred with Leah and the key affiliates (**Exhibit B**).

## VI.     New Business

A.     **Review of DETC Standards** – Ms. Dempsey reviewed the standards that are out for public comment. These standards are posted on DETC's website and are out for public comment. Comments are due to Sally by May 1, 2013.

    1.     Proposed Changes Presently Out for Public Comment (comments due May 1, 2013) – Approved by Commission on January 10, 2013 AND March 18,2 013

        a)     Business Standard, III.A. – changes on discounting tuition (Exhibit C)

        b)     C.3. Policy on Change of Ownership/Management – Major revision AND adding requirement to submit a new Teach-Out Commitment (page 4) Connie Dempsey reviewed need for teach out, financial resources review and change in school visit. (Exhibit D)

        c)     C.4. Policy on Change of Location or New Administrative Site -- adding "The Commission must also be notified when an administrative site is closed" to page 1 and "Closure of an Administrative Site, page 4: **AND** adding definition of "location" and "Administrative Site." (Exhibit E)

        d)     C.9. Policy on Degree Programs, Standard VII. Admission Practices; deleting English requirements **AND** changing English proficiency level for minimum CEFR to B-2. Deleted the grade of C requirement for an English course. (Exhibit F)

        e)     C.14. Policy on Student Achievement and Satisfaction – Major changes; schools no longer will have to report completion rates for degree courses; completion and graduation rates charts are revised; for completion rates, students still studying may be removed; graduation rates now exclude students who have not completed 3 academic credits and students still studying; degree graduation rates are done by cohort going back 150% of normal time; Commission reviews

completion and graduation rates data and will establish minimum acceptable rates. – Cindy Mathena reviewed the major changes in this document. (Exhibit G)

  f)  C.17. Policy on International Activities; requiring on-site visits (Exhibit H)

  g)  C.29. Policy on Contract for Educational Delivery – major revision (Exhibit I)

  h)  E.2. Application for Accreditation – adding requirement for a physical office (#3. page 2) (Exhibit J)

**B.**  **Outcomes Assessment Session**

Ms. Dempsey said that Dr. Cindy Mathena will be moderating a session on Monday at 2:45 called "Continued Dialogue on Outcomes Assessment." There will be 3 panel members who will direct people to round-table discussion depending on the size of their institutions. They all will be discussing the recent changes to C.14. and how these pertain to your institution.

**C.**  **Update on State Authorization from WCET SANS (State Authorization Network)**

Mary Adams and Cindy Mathena discussed the reciprocity agreement that may be signed this week in Indianapolis.

D. **Topics for Fall Workshop**

Ms. Dempsey asked if anyone had suggestions for topics for the Fall Workshop (October 13-15, 2013 at The Windsor Court Hotel in New Orleans, to please submit the topics using the online form found on DETC's website or send them to Rob Chalifoux – rob@detc.org.

**VII.**  **Other Business:**

Ms. Susan Chiaramonte, Harrison Middleton University provided a summary of her review of one of MaxKnowledge's online course EL106 – Evaluating Student Learning in Online Courses (Exhibit K). She reported that the course was basic, but may have a lot to offer for schools. The course is inexpensive and reviewed basic terminology and assessment procedures here are also five other tutorials that are free to DETC members. There is a link on the DETC website with additional information.

Dr. Wanda Nitsch asked that DETC consider a policy on how to review and accept coursework completed via a Massive Open Online Courses or MOOC. A discussion ensued on practices that comply with normal acceptance and transfer policies, in particular with those that have been reviewed by ACE.

**VIII.** **Next Meeting:** The next meeting will be Sunday, October 13, 2013 at the Windsor Court Hotel in New Orleans, LA. The meeting will be held in conjunction with the DETC Fall Workshop, October 13-15, 2013.

**IX.**  **Adjournment –** Dr. Marianne Mount moved and Dawn Turco seconded a motion to adjourn the meeting. The meeting was adjourned at 2:15 pm.

Distance Education and Training Council

**Research and Educational Standards Subcommittee**

**MINUTES**

October 14, 2012
El Dorado Hotel and Spa
Santa Fe, NM


Attendees:        Connie Dempsey, Chair, Penn Foster
                  Cindy Mathena, Vice Chair, University of St. Augustine for Health Sciences
                  Mary Adams, American Sentinel University
                  Lute and Ramsey Atieh, American College of Technology
                  Debashish Banerji, University of Philosophical Research
                  Kristi Bordelon, Teacher Education University
                  David Boyd, Taft University
                  Virginia Carlin, John Hancock University
                  Andrew Carpenter, John Hancock University
                  Susan Chiaramonte, Harrison Middleton University
                  Lynn Connolly, Holmes Institute
                  Jon Crispin, Columbia Southern University
                  John Curcio, Apollos University
                  Jeff Cropsey, Grantham University
                  David Curd, Harrison Middleton University
                  Scott Eidson, Apollos University
                  Patrick Gamboa, International Sports Sciences Association
                  Leslie Gargiulo, Ashworth College
                  Jennifer Green, Huntington College of Health Sciences
                  Charli Hislop, Allied Business Schools
                  Grace Lee, Southwest University
                  Robert Mayes, Columbia Southern University
                  Paul McDonald, American Graduate University
                  Kathleen Mirabile, Brighton College
                  Sal Monaco, New Charter University
                  Marianne Mount, Catholic Distance University
                  Parrish Nicholls, Allied Business Schools
                  Wanda Nitsch, University of St. Augustine for Health Sciences
                  Jessica Park, Abraham Lincoln University
                  Dorene Petersen, American College of Healthcare Sciences
                  Marianne Mount, Catholic Distance University
                  Janet Perry, Weston Distance Learning
                  Christopher Reeves, Shiloh University
                  Ann Rohr, Weston Distance Learning
                  Caroll Ryan, California Southern University
                  Marie Sirney, American Graduate University
                  Karen Smith, Columbia Southern University
                  Leona Venditti, INSTE Bible College

Roy Winter, Abraham Lincoln University
Erika Yigzaw, American College of Healthcare Sciences

I.    **Call to Order:** The meeting was called to order by Chair Connie Dempsey at 1:30 p.m. on Sunday, October 14th, in the Anasazi South room of the El Dorado Hotel and Spa. The meeting was held in conjunction with DETC's Fall Workshop, October 14-16, 2012.

II.   **Welcome and Self-Introductions:** Ms. Connie Dempsey welcomed members of the committee and thanked them for coming; each person introduced him/herself.

III.  **Approval of April 15, 2012 Minutes (Exhibit A):** Mr. Sal Monaco moved and Wanda Nitsch seconded a motion to accept the Minutes as distributed. The motion carried unanimously.

IV.   **Old Business**

    A.  **Update on the DETC Online Courses:** Ms. Dempsey reported that as of October 9, 2012 there are 360 Business Standards completions; 175 who have completed the Preparing for Accreditation course, and 135 who completed the Evaluators' Training. The DETC online courses (tutorials) will be moved the MaxKnowledge as of October 15, 2012 and will provide greater automaticity, as well other courses being offered , some for free and some for cost. Profits from the courses will be donated to the Wounded Warrior Project. A press release was provided (**Exhibit B**).

    B.  **Update on the Outstanding Graduate Program:** Ms. Dempsey reported that we have 39 outstanding graduates and 15 famous alumni (with 40 institutions participating).

    C.  **Report on Regional Meeting in CA:** Nan Ridgeway provided a brief summary on the meeting held on September 19, 2012 at California Southern University's offices in Irvine, CA. More than 50 people attended and provided timely updates on DETC events and policies. Ms. Dempsey thanked Caroll Ryan and California Southern University for hosting the meeting.

    D.  **CHEA Petition:** Mike Lambert reported that Part I has been completed and passed and Part II is an application for recognition. Mike said that they will be looking at all the schools Consumer Disclosure Forms on school websites. If successful, the recognition will span the next ten years. The final Petition is due to CHEA in December 2012.

    E.  **U.S. Department of Education Compliance Report:** Mike Lambert reported that in an era of hyper scrutiny, only four agencies of 25 got full, five year recognition in the first year. The petition took one year to prepare, DETC performed extremely well with only two minor findings. A compliance report on those findings was submitted and we were placed on the December consent agenda. If approved we will be good through 2017, one of only a handful of agencies to get five year approval. DETC was complimented on their application by NACIQI members.

    F.  **Update on Staff Activities:** Sally Welch attended the DOD meeting the last week of July in Las Vegas, NV, and came back reporting significant negative attitudes against for-profits and DETC schools.  Robert Mayes of Columbia Southern University and his team have been working on a series of newsletters to be sent to the EOS community to focus on positive stories within DETC schools. The newsletters will be a public relations effort to address the negative

perceptions of ESOs. Mike has asked several key personnel to do a webinar for the military community to explain accreditation. Mike has been interviewed on Higher Education Radio twice. Two new staff have been hired, Brianna has resigned and is working at NYU. The executive committee continues to interview qualified candidates to replace Mike Lambert and will be conducting f2f interviews in December; the Commission will interview the final two candidates in January.

## V.  New Business

A.  **Review of DETC Standards:** Ms. Dempsey reviewed the standards which are out for public comment:

1.  Proposed Changes Presently Out for Public Comment (comments due December 1, 2012)

   a)  Change to C.9., Standard VI – Qualifications of Faculty (All Master's program faculty must have an earned doctorate/terminal degree relevant to the program being offered") – **Exhibit C.**

   b)  Change to C.9., Standard VI – Qualifications of Faculty (The institution must justify and document in the faculty member's personnel file and academic and professional preparation he or she has to teach the course(s), and what course(s) is/are being taught") – **Exhibit C.**

   c)  C.14. Policy on Student Achievement and Satisfaction (major revision) – **Exhibit D.**

   d)  Change to C.21. Policy on Required Institutions Documents (adding resumes and official transcripts of its instructors – and signature of person who scanned the transcripts) – **Exhibit E.**

   e)  Change to E.17. Glossary – changes or additions to Institutional Learning Outcomes; Program Learning Outcomes; Course Objectives – **Exhibit F.**

2.  **Newly Proposed Changes:** Changes to C.9. Policy on Degree Programs (increase credit allowed for experiential or equivalent learning – **Exhibit G**). Ms. Dempsey reviewed the proposed policy and defined the rationale behind the proposed increase from 25% to 30% in non-transcripted activities. She further explained that these types of activities should be documented from the learning activities that take place per the course objectives. CAEL best practices are encouraged. Connie requested feedback and discussion from members. This proposed change will go to the Commission in January of its approval, and then out for public comment. Final adoption should be in June 2013.

B.  **Task Force on Outcomes Assessment Revision**: Cindy Mathena reviewed the committee's work and the workshop that will be presented on Tuesday.

C.  **Topics for 87th Annual Conference:** Ms. Dempsey said that if anyone is interesting in presenting at the 87th Annual Conference, April 14-16, 2013, to submit a proposal through DETC's website.

**VI.**   **Other Business:** Leslie Gargiulo reviewed Information on Massive Open Online Courses (MOOC's) and shared an overview document and the potential impact on accreditation **(Exhibit H)**.

**VII.**   **Next Meeting:** The next meeting will be Sunday, April 14 at the Intercontinental Mark Hopkins, San Francisco, CA. The meeting will be held in conjunction with the DETC's 87th Annual Conference.

**VIII.**   **Adjournment:** Marianne Mount moved and Mary Adams seconded a motion to adjourn the meeting. The meeting was adjourned at 2:15 p.m.


**Exhibits:**   A – Minutes of Research and Educational Standards Committee meeting April 15, 2012
B – MaxKnowledge Press Release – October 15, 2012
C – Changes to C.9. Standard VI.
D – Changes to C.14. Policy on Student Achievement and Satisfaction
E – Changes to C.21. Policy on Required Institutions Documents
F – Changes to E.17. Glossary
G – Proposed Changes to C.9. by Connie Dempsey
H – Massive Open Online Courses paper by Leslie Gargiulo

# Highlights of DETC Staff Activities
## April 2012 – March 2013

### April 2012

- Conducted 86th Annual Conference in Maui, Hawaii. Over 180 attended.
- Conducted Title IV Seminar with Dr. Sharon Bob in Maui, Hawaii. Twelve people attended
- Attended NASASPS Conference in Virginia and hosted dinner for officers
- Published Annual Report of the Executive Director
- Published Final DETC Budget for 2012-2013

### May 2012

- Conducted Meeting of the Accrediting Commission
- Submitted Response to the ED Staff Analysis of the DETC Petition for Continued Recognition
- Published Spring 2012 *DETC News*
- Conducted Webinar on State Authorization with WCET of Boulder, CO
- Met with ED Accreditation Staff About DETC Response
- Conducted Task Force on Tuition Discounting Conference Call

### June 2012

- Conducted Meeting of the Accrediting Commission
- Participated in CHEA Committee on Recognition Meeting (Lambert is a member)
- Presented at the NACIQI Meeting where DETC received continued recognition and a commendation from Committee members for its good work on the Petition

### July 2012

- Lambert interviewed on Higher Education Radio by host Larry Jacobs
- Welch attended the DOD World Wide Symposium in Las Vegas
- Lambert presented two sessions at Department of Education meeting for accrediting officials on "How to Prepare an Effective Petition for Recognition"
- Coordinated national search efforts for a new DETC Executive Director

## August 2012

- Conducted Workshop at Faculty Institute at Andrews University in Michigan
- Interviewed a second time by Larry Jacobs of Higher Education Radio
- Attended DC area accreditors meeting
- Welcomed Brenda Amaya to the DETC Staff as Accreditation Assistant

## September 2012

- Issued Fall *DETC News*
- Continued efforts on the national search for a new Executive Director
- Prepared and submitted Interim Report to the Secretary of Education
- Held Subcommittee on Academic Reviews and over 75 new programs were approved
- Held Regional DETC Meeting on September 19th at California Southern University, 48 people attended and 23 institutions were represented
- Visited the new Director of Education Benefits at the VA, MG Robert Worley

## October 2012

- Conducted Meeting of the Accrediting Commission
- Conducted the Fall DETC Workshop in Santa Fe; 112 attended
- Published New DETC Members' Personnel Directory
- Welcomed Patrice Wall as new DETC's Information and Accounts Specialist

## November 2012

- Soft launch of new DETC Information Management Suite
- Published eNewsletter targeting military education service officers
- Presented at ACCET Annual Conference, Lake Tahoe, CA
- Lambert participated in CHEA COR Meeting

## December 2012

- Executive Committee conducted Two Days of Interviews of 6 finalists for the Executive Director position
- Submitted Application for Continued Recognition to CHEA
- Presented at the NACIQI Meeting; DETC received a full five year recognition
- Prepared Agenda materials for the January 2013 Accrediting Commission Meeting

- Sponsored a Webinar, Accreditation 101, for DOD ESOs, conducted by CHEA, SOC, USAF and DOD officials. DETC conceived of and coordinated the project. Elise Scanlon was the moderator. DOD plans to archive the Webinar and promote it to the ESO community.

## January 2013

- Conducted Accrediting Commission Meeting on January 10-11
- Executive Committee selected new Executive Director
- Published *DETC Accreditation Handbook*, 2013 edition
- Published 2013 DETC Outstanding Graduates and Famous Alumni booklet – 34 outstanding graduates and 9 Famous Alumni
- Mr. Lambert interviewed on Higher Education Internet Radio; third such interview

## February 2013

- DETC Executive Committee announced the appointment of a new Executive Director, Dr. Leah Matthews, just the seventh Executive Director in 87 years, the first to be appointed following a national search in 53 years, and the first woman to hold the office
- Executive Director attended Council of College and Military Educators (CCME) Symposium in San Diego, CA, February 25-28
- Received letter notifying the continuation of DETC's Federal recognition for a full term without condition from David A. Bergeron, Acting Assistant Secretary of the Office of Postsecondary Education, U.S. Department of Education
- Analyzed Annual Reports submitted to DETC by member institutions
- Analyzed and sent outcomes assessment letters to institutions

## March 2013

- Finalized Program for the 87th Annual Conference
- Prepared DETC Operating Budget for FY 2013-2014
- Published and distributed Outstanding Graduate booklets; shipped out plaques
- Distributed Announcement of Dr. Matthew's appointment to the nation
- Chair Timothy Mott and Mr. Lambert presented testimony at the CHEA Committee on Recognition for continuation of DETC's CHEA recognition
- Initiated process of transitioning to a new Executive Director, who assumes the position on April 1st, 2013.

**DETC Business Standards – Proposed Revision to Business Standards III.A.**
*(approved by Commission 1/10/13 – out for public comment – comments due by May 1, 2013)*

5. The total price for an individual course or program must be the same for all people, with the exception of discounts for well-defined groups. The total price for each course or program must be clearly identified and easily accessible on the institution's website, catalog, and enrollment agreement.

6. Any variation in Total Course Price must be documented. This applies to institutional-awarded scholarships, grants, discounts, special price offers, or announcements of price increases.

7. A non-discounted course or program price must be offered to the public for a reasonably substantial period of time during each calendar year, and it can be documented that students were enrolled at that price

8. Variations from the Total Course Price with the exception of discounts for well-defined group must meet the following conditions:

   a. All discounts or special offers must be identified with a specific course or program price.

   b. All discounts and special offers must be presented in a format appropriate to an accredited educational institution.

   c. All discounts or special offers must contain a specific expiration date, which must be honored. Announced discounts or price offers may not be extended beyond the announced expiration date.

   d. All grants or scholarships must be documented with published criteria and processes used for awarding grants and scholarships.

# 3.  Policy on Change of Ownership/Management
*(approved by Commission 1/10/13 & 3/18/13 – out for public comment – comments due by  May 1, 2013)*

As stated in C.1. Policy on Substantive Change and Notification, any change in the legal status, form of control, or ownership/management of an institution is considered a "substantive change" and prior approval is required before the change may be included in the institution's grant of accreditation.

Accreditation does not automatically follow the institution when all or a majority share of its interests are sold, or when an institution undergoes major management changes. If the new ownership wishes to continue the institution's accreditation, it must advise the Commission *before* the change is made, and the proposed new ownership must be approved by DETC, and it must undergo a comprehensive on-site review as an institution operating within the changes that a new owner or management might initiate.

## Definitions

A "change in legal status" is defined as a change in the legal definition of the company or corporation, which is typically defined by the state or U.S. government, such as changing from a for-profit to a non-profit.

"Control" is the ability to direct or cause the direction of the actions of an institution. Examples of change of "form of control" are: the sale of all or majority interest of the institution's assets; sale or assignment of the controlling interest of the voting stock of a corporation that owns the institution or that controls the institution through one or more subsidiaries; merger or consolidation of the institution with other institutions; or an independent corporation owning an institution that becomes a subsidiary of another corporation with a different ownership.

A "change of ownership" is defined as any transaction or combination of transactions that would result in a change in the control of an accredited institution.

A "change of management" is defined as the replacement, since the last accreditation examination, of the senior level executive of the institution, e.g., President or CEO.

To ensure a successful transfer of accreditation through a change of ownership, the institution's proposed new owners, governing board members, and administrators must possess sound reputations and show a record of integrity and ethical conduct in their professional activities, business operations, and relations. The proposed new owners, board members, officials, and executive staff must have records free from any association with any misfeasance, including, but not limited to, owning, managing or controlling any educational institutions that have entered bankruptcy or have closed with students having been disadvantaged as a result.

## Action

**Changes of Ownerships Notification (Prior to the Sale):** A minimum of **60** days *before* the change is proposed to take place and by the deadlines for document submission for each commission meeting; an institution seeking to change ownership must submit E.14. Application for a Change of Ownership/Management, and include the application fee and the *Change of Ownership Notification Report* (see below). Upon review of the Application and the *Change of Ownership Notification Report,* the Commission may take one of the following actions:

1. Require an on-site visit prior to the sale.
2. Approve the transfer of ownership request with or without restrictions and order a follow-up on-site visit within six months;

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3. Defer the matter for further consideration;
4. Deny the accreditation under the new ownership; or
5. Take any other action deemed appropriate pursuant to Commission policies and standards.

Failure to obtain prior Commission approval of the transfer of ownership as required will result in the expiration of accredited status of the institution as of the date that the change of ownership occurs.

When a sale is *contemplated,* the new owner must take immediate steps to obtain DETC approval. Failure to do so will result in loss of accreditation status. Following the initial approval of change of ownership, the Commission will order that a *Change of Ownership Report* and a site visit as a condition of the initial approval. The on-site visit must take place within **six** months of the sale or closing. For the purposes of continuing the accredited status of an institution, the effective date of a change of ownership is the date of the sale or closing.

In the case where an institution is authorized and is participating in Title IV Federal student aid programs, where continuation of Federal eligibility is contingent upon uninterrupted accreditation, copies of filings and submissions to the U.S. Department of Education must be included in the Change of Ownership Application along with any correspondence received from the Department. The institution assumes the responsibility of ensuring timely notification and timely submission of reports to DETC in order to facilitate a seamless transfer of ownership and continuation of institutional eligibility. Please note that the U.S. Department of Education has very time-sensitive regulations regarding change of ownership for institutions' participating in Federal student aid programs.

The Accrediting Commission will not accredit a distance study institution with a franchise, distributorship, or similar sales arrangement. While "independent contractors" may be used by institutions on an individual basis in conformity with all of the DETC Business Standards, the use of a separate layer of management organization such as a franchise or distributorship does not meet the intent of the standards.

Any distance education institutions or programs owned or offered by the acquiring owner are subject to the "all or none rule." All accredited distance education activities of an ownership must become accredited, or none may be. If a new owner owns or operates other distance education institutions, those institutions must receive accreditation within **two** years of the change of ownership or accreditation may be withdrawn.

The institution must be properly licensed, authorized or approved by the applicable state educational institution authority. The institution must conform to all provisions of applicable laws and regulations.

The Accrediting Commission reserves the right to order a comprehensive review of the institutions at any time it has concerns that the institution is not in compliance with the DETC's standards, policies, and/or procedures.

**Change of Ownership Notification Report:** The institution and/or the proposed new owners must provide DETC with **sufficient, comprehensive and relevant background information** on the post-ownership change to allow the Commission to conduct an assessment of the projected financial stability and academic integrity of the institution under the proposed new ownership and by ~~explaining the finances~~ providing documentation of the proposed transaction. The institution must submit the following in its *Change of Ownership Notification Report:*

- Curriculum Vitas or resumes of the principals and senior managers of the acquiring entity.

- Description of any felony convictions for any of the principals or senior managers of the acquiring entity.

- Complete description of how the change will be executed and the financial details involved including a copy of the draft purchase agreement and related documents (e.g., share transactions, payments, etc.).

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- Current financial statements of the acquiring entity, which must include an audit or reviewed statement prepared by an independent CPA in accordance with GAAP and DETC C.10. Policy on Financial Statements.

- The institution must provide sufficient information to allow an assessment of its projected financial stability and responsibility under the proposed new ownership and by explaining the financing of the proposed transaction. In addition, the institution must provide a pro forma balance sheet reflecting the financial condition of the institution after the change of ownership. The balance sheet must, at a minimum, break down current assets, fixed assets, other assets (if appropriate), current liabilities, long-term liabilities, and equity. The balance sheet must also reflect the estimated outstanding unearned tuition as of the date of the sale of the school.

- Full description of any other educational institutions with which the principals of the acquiring organization have been involved, including full details on the accredited status and the operating history of such institutions.

- Full discussion of any of the acquiring institutions' or their principals' involvement with any institutional closures, bankruptcies or loss of accreditation or state license or loss of Federal Student Financial Aid eligibility or debarment from FSA program participation.

- Comprehensive description of any contemplated, future changes planned for the institution, including growth plans, governance structure and board membership, changes in management, senior academic staff, academic programs, marketing tactics, services, location or any other significant areas of operation or institution mission.

- For institutions participating in Title IV programs, a copy of the pre-acquisition packet filed with the U.S. Department of Education and any correspondence from the Department.

- Copies of filings regarding the change of ownership submitted to the home state higher education agency.

- Organizational chart showing the institution, any parent or holding companies, governing boards, and key administrators at all levels, currently in place and as anticipated by the transaction. Such charts should outline the relationship between the accredited institution and the corporate structure after the close of the transaction.

- A list of all board members, managers, and/or partners affiliated with each entity that is part of the proposed new ownership structure and a description as to how their experience and qualifications prepare them to oversee the operation of a DETC-accredited school and assures that the school will maintain compliance with accreditation standards under the new ownership.

~~The institution must provide sufficient information to allow an assessment of its projected financial stability and responsibility under the proposed new ownership and by explaining the financing of the proposed transaction.~~

The proposed new ownership will be evaluated on these factors (among other information the Commission may receive):

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- Do the institution's proposed new owners, governing board members, and administrators possess appropriate education experience along with sound reputations and show a record of integrity and ethical conduct in their professional activities, business operations, and relations?

- Do the proposed new owners*, board members and executive staff have records free from any association with any misfeasance, including, but not limited to, owning, managing or controlling any educational institutions that have entered bankruptcy or have closed with students having been disadvantaged as a result?

   *"New owners" include the names of the acquiring organization, institution, corporation, venture capital firm and the names of their principals, chief executives and chief operating officers of all the above.

- The results of a background check of the acquiring organization's owners, officers, which may include, but not be limited to, DETC surveys of State educational oversight agencies, Federal departments and agencies, consumer protection agencies, checks on the credit history, prior bankruptcy, criminal background, debarment from Federal Student Aid Programs, the closing of educational institutions in which they were owners, managers or principals, or the loss of accreditation or state approval to operate an educational institution. (The costs of such background checks will be borne by the acquiring organization.)

- The continuation of the institution historically affiliated with DETC with regards to mission and objectives, and the substantial likelihood the institution will continue to meet DETC standards.

- Evidence that all regulatory compliance requirements with home state licensure agency have been met and/or will be met.

- Adequate financial support for the transaction.

Additional consideration may be required if: 1) the background of the proposed owners raise questions concerning compliance with DETC Standard VI.A. as to their qualifications, 2) the proposed ownership change raises concerns as to the soundness of the  financial structure of the institution, 3) or other concerns arise regarding the institution's compliance with accrediting standards.

A proposed transfer of ownership will be approved only if it is determined by the Commission that the proposed new owners and managers have records of integrity and the capability to own and operate a DETC accredited institution in accordance with DETC Standards VI.A. and VI.D. that under the new ownership the financial condition of the institution will remain sound with sufficient resources for the operation of the institution and discharge of obligations to students, and that the institution will otherwise remain in continuous compliance with all accrediting standards.

**Post-Change of Ownership Examination**

After a proposed change of ownership has been approved by DETC, and the transaction has been made final, the institution must submit a *Change of Ownership Report* and undergo an on-site visit within **six months** of the date of the sale or closing. The *Change of Ownership Report* must be submitted at least four weeks before the on-site visit.

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**Change of Ownership Report:** The institution must include the following in its *Change of Ownership Report*:

- Updates of the information provided in the *Change of Ownership Notification Report*;

- Provide documentation that the institution is properly licensed, authorized, or approved by the applicable state educational authority.

- <span style="color:red">**Submit a new E.8. Teach-Out Commitment (Non-Corporate Entities) or E.9. Teach-Out Commitment (Corporate Entities).**</span>

- Provide information reflecting the impact of the change of ownership or future plans concerning the following Standards:

  **I.  Mission, Goals, and Objectives:** Were any changes made to the institution's mission, goals, and objectives as a result of the change of ownership? If so, what are they and how are they being instituted? Discuss how the revised mission, goals, and objectives are widely circulated and readily access to students, faculty, staff and other stakeholders.

  **II. Educational Program Objectives, Curricula, and Materials:** Have any new courses/programs been added since the change of ownership? Are there any plans to add new courses/programs?

  **III. Educational Services:** Have there been any changes in the educational services provided to students since the change of ownership? If so, what are they?

  **IV. Student Support Services:** Have there been any changes with student support services since the change of ownership? If so, what are they?

  **VI. Qualifications and Duties of Owners, Governing Board Members, Officials, Administrators, Instructors/Faculty, and Staff:** Have there been any changes in the Governing Board Members, Officials, Administrators, Instructors/Faculty, and Staff since the change of ownership? Give particular emphasis on qualifications of the educational director and the chief administrator. If any new course/programs have been added, discuss any new instructors/faculty and staff members added.

  **VII. Admission Practices and Enrollment Agreements:** Have there been any changes to admissions standards? Supply copies of new enrollment forms.

  **VIII**. **Advertising, Promotional Literature, and Recruitment Personnel:** Have there been any changes in marketing tactics or actions? If so, explain fully. How will sales representatives/recruitment personnel, if any, be controlled? What is the background of the head of marketing?

  **IX. Financial Responsibility:** What is the financial impact of the change of ownership? What future impact is anticipated? State if any of the new corporate owners ever declared bankruptcy. If the institution is a small corporation (current assets of less than $100,000), sole proprietorship, or partnership, then the institution must state whether the individual owners, officers, or directors have ever declared bankruptcy for any school or business they owned. Discuss any conditions of the sale or change of ownership that ~~may~~ have had or will have on the financial impact on the institution.

  **XI. Facilities, Equipment, Supplies, and Record Protection:** State if and how the new owners plan to expand, and show how facilities, equipment, and supplies are adequate to accommodate this expansion.

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**XII. Research and Self-Improvement:** Discuss the new owner(s)' long-range plan for the institution respective to courses, facilities, technology, and number of enrollees. Provide a revised Strategic Plan.

The Commission will review the institution's *Change of Ownership Report*, the Chair's Report on Change of Ownership, and the institution's response to the Chair's Report and make one of the following decisions: 1) continue the institution's accreditation under the new ownership; 2) defer the matter for further consideration; 3) deny the accreditation under the new ownership, or 4) take any other action deemed appropriate pursuant to Commission policies and standards. The Commission will notify the institution within **30** days of its final decision.

**Change of Management Notification**

When an institution makes a change in management, as defined as the replacement of the senior level executive of the institution, e.g., President or CEO, since the last accreditation examination, it must notify the Commission as soon as possible *prior* to the change.

**Change of Management Report:** The institution must submit E.14. Application for a Change of Ownership/Management and a *Change of Management Report*. The report must provide a full explanation as to when the change in management is being made, why it is being made, and how the change will affect the institution's capacity to continue to meet all of DETC Standards of Accreditation, specifically Standards VI.A. and VI. D.:

> **Standard VI.A**. **The Owners, Governing Board Members, Officials and Administrators:** The Owners, Governing Board Members, officials and administrators possess appropriate qualifications and experience for their positions and roles and have demonstrated the ability to direct institutional operations and evidence overall stability of institutional operations. The governing board members are knowledgeable and experienced in one or more aspects of educational administration, finance, teaching/learning, and distance study. The institution has policies that clearly delineate the duties and responsibilities of governing board members, officials, and administrators. Individuals in leadership and managerial roles are qualified by education and experience.

> **Standard VI.D**. **Reputation of Institution, Owners, Governing Board, Officials, and Administrators** The institution and its owners, governing board members, officials, and administrators possess sound reputations and possess a record of integrity and ethical conduct in their professional activities, business operations, and relations.

The institution must provide documentation on the qualifications of the new management and a summary of his/her job description.

Upon review of the *Change of Management Report*, the Commission may approve the change of management; defer the matter for further consideration; or take any other action that it deems appropriate, including requesting a comprehensive review of the institution. The Commission will notify the institution within 30 days of its final decision.

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**Change of Legal Status Notification**

When an institution changes its legal status as defined as a change in the legal definition of the company or corporation, which is typically defined by the state or U.S. government, such as changing from a for-profit to a non-profit, or from an S Corporation to a LLC, it must notify the Commission within **30** days prior to the change.

**Change of Legal Status Report:** The institution must submit E.14. Application for a Change of Ownership/Management and provide a full explanation as to when the change of legal status is being made, why it is being made, and how the change will affect the institution's capacity to continue to meet all of the DETC Standards of Accreditation. For example, if the institution is changing from a for-profit to a non-profit status, what impact will this change have on management, students, programs, marketing, financial stability, etc.

The institution must provide sufficient information to allow an assessment of its projected financial stability and responsibility under the proposed new legal entity and explain the financing of the proposed transaction.

Upon review of the notification the Commission may approve the transaction, defer the matter for further consideration; or take any other action that it deems appropriate, including requesting comprehensive review of the institution. The Commission will notify the institution within **30** days of its final decision.

**Change of Control Notification**

When an institution changes its form of control as defined as the ability to direct or cause the direction of the actions of an institution, it must notify the Commission within **30** days prior to the change.

**Change of Control Report:** The institution must submit E.14. Application for a Change of Ownership/Management and provide a full explanation as to what constitutes the change of control, when the change will occur, why it is being made, and how the change will affect the institution's capacity to continue to meet all of the DETC Standards of Accreditation. For example, an independent corporation owning the institution becomes a subsidiary of another corporation with a different ownership.

The institution must provide sufficient information to allow an assessment of its projected financial stability and responsibility under the proposed new legal entity and explain the financing of the proposed transaction.

Upon review of the notification the Commission may approve the transaction, defer the matter for further consideration; or take any other action that it deems appropriate, including requesting comprehensive review of the institution. The Commission will notify the institution within **30** days of its final decision.

# # #

~~Revised October 2012~~
June 2013

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# 4.  Policy on Change of Location or New Administrative Site

*(approved by Commission 1/10/2013 & 3/18/13 – out for public comment – comments due by  May 1, 2013)*

As stated in C.1. Policy on Substantive Change and Notification, any change in the location or addition of a new administrative site is considered a "substantive change" and prior approval is required before the change may be included in the institution's grant of accreditation. **The Commission must also be notified when an administrative site is closed.**

**A "location" is defined as a geographic location that houses the headquarters of an institution. The institution must provide evidence that is approved in the state for the activity that it conducts at the new location.**

**An "Administrative Site" is a separate office located geographically apart from the main headquarters' location, which typically provides an off-site workplace for the convenience of institution officials who do not live near the headquarters. Neither educational programs nor instructional services to students are offered from an administrative site. For DETC purposes, administrative sites are not listed in DETC's *Directory of Accredited Institutions*. The institution must provide evidence that is approved in the state for the activity that it conducts at the administrative site.**

When an institution decides to move to a new location, however close to the original site, or add a new Administrative Site, it is necessary for an Examining Committee member to visit the new site and for the Accrediting Commission to approve the new site. This policy applies when any previously approved location (headquarters or administrative offices) is affected or a new Administrative Site is added. (When a training site is moved, refer to C.7. Policy on New Combination Distance Study—Resident Programs.)

### Action

An institution must notify the Executive Director by submitting an Application for Change of Location or New Administrative Site (E.15.) and $500 processing fee at least 30 days before the change or new location takes place. Before accreditation can be affirmed for the new location, the institution must prepare a *Change of Location* or *New Administrative Site Report*, undergo an on-site visit, and receive approval from the Commission.

An on-site visit must take place within **six** months of the change of location or addition of a new administrative site.

The Accrediting Commission will review and give careful consideration to the institution's *Change of Location* or *New Administrative Site Report* and the Examining Committee's Report on the site visit. If the Committee's Report is favorable, the Commission may grant its approval. The Commission will provide written notification within **30** days of its decision.

The Commission may require the institution to make changes that are recommended in the Examining Committee's Report. The institution will be provided a copy of the Examining Committee's Report on the change of location on-site visit, and an opportunity to respond affirmatively to any required actions that may be listed in the Report prior to the Commission's consideration of the Report.

The Accrediting Commission reserves the right to order a comprehensive review of an institution at any time it has concerns that the institution is not in compliance with the DETC's standards, policies, and/or procedures.

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**Change of Location or New Administrative Site Report**

When the new site is established or the move is completed, the institution must submit an electronic *Change of Location* or *New Administrative Site Report* 30 days before the on-site visit. The Report must address the following Standards:

> II. Educational Program Objectives, Curricula and Materials
> III. Educational Services
> IV. Student Support Services
> VI. C. Faculty/Instructors/Staff
> VIII. A. Advertising and Promotion
> IX.C. Financial Sustainability and Stability
> IX.E. Demonstrated Operation
> XI. A. Facilities, Equipment, and Supplies
> XI. B. Record Protection

The *Change of Location* or *New Administrative Site Report* must be signed and dated by the institution's President. Please submit a copy of the Report in WORD. The Report must include a narrative and supporting documentation when appropriate on the following:

1. Background on the institution (structure of the institution, date founded by whom, date first accredited, former address, what programs are offered, number of students, number of staff members, etc.).

2. The date and reason(s) for the relocation or new administrative site.

3. Name, address, and telephone number of the new site.

**II. Educational Program Objectives, Curricula, and Materials**

4. A description of any changes in courses/programs resulting from the relocation or establishing a new Administrative Site.

**III. Educational Services**

5. Provide information on any significant changes to educational services resulting from the relocation or establishing a new administrative site.

**IV. Student Support Services**

6. Provide information on any significant changes in student support services resulting from the relocation or establishing a new administrative site.

**VI. C. Instructors/Faculty and Staff**

7. A report on changes that have been made to the institution's staff and faculty (provide resumes of new faculty and state what courses they are teaching).

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**VIII. A. Advertising and Promotion**

8.  Provide information on changes to any advertising and promotional materials (including website) showing the new address, phone numbers, etc.

**IX.C. Financial Sustainability and Stability**

9.  Evidence that the institution is maintaining adequate administrative staff and other resources to operate effectively as a going concern and is not exposed to undue or insurmountable risk. Any risk that exists is adequately monitored, manageable, and insured.

10. Provide a compilation of financial statements for the institution's most recent two fiscal years that include the minimum requirements (i.e., footnotes, cash flow statement, etc.) as shown in C.10. Policy on Financial Statement. These do not need to be reviewed or audited. However, the Commission reserves the right to request audited or reviewed statements if needed.

**IX.D. Demonstrated Operation.**

11. Evidence that the institution is or continues to be properly licensed, authorized, or approved by the applicable state educational institutional agency.

12. Provide an updated DETC Teach-Out Agreement form (E.8. or E.9), which includes the institution's new address.

**XI. A. Facilities, Equipment and Supplies**

13. Evidence that the institution is maintaining sufficient facilities, equipment, and supplies to achieve its mission and goals and support its programs and future growth.

14. A description of the new location that should include a picture, diagram, and floor plan of the facilities.

15. A copy of the lease or deed for the site.

16. Evidence of professional liability, property, and general liability for the institution. Provide a copy of the "Certificate of Liability Insurance."

17. Full information on the office equipment and record keeping storage system showing that the new location is capable of handling the administrative requirements and the educational program of the institution.

18. A copy of a certificate of occupancy permit or any other documents required by local officials for operating the institution at the new location.

19. A description of any relevant documentation evidence of compliance with fire codes. Provide a copy of the fire inspection report.

20. Provide documentation of the fire exit plan, fire suppression plan, and first aid equipment in use at the location. Describe other emergency procedures in place for the protection and safety of employees.

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**XI.B. Record Protection**

21. Information on how records are maintained, protected, stored, and retained at the new location. Describe fully the hardware and software capabilities, and explain how vital records are protected from theft, fire, flood, earthquakes or other natural disasters.

22. Provide information on how long student records are kept, and if they are legible and accessible.

23. Explain how the institution is meeting DETC's requirements for keeping official documents as described in C.21. Policy on Required Institutional Documents. (Any document that contains a signature, seal, certification, or any other image or mark required to validate the authenticity of its information must be maintained in its original hard copy or in an imaged media format. An institution may maintain a record in an imaged media format only if the format is capable of reproducing an accurate, legible, and complete copy of the original document. When printed, the copy must be approximately the same size as the original document.)

24. If applicable, detail how the institution is maintaining documents electronically. Provide evidence that the institution documents the procedures and provides audit trails to serve as the record that the images were created properly and validated.

25. If applicable, describe the migration plan may needed to ensure that the information in the images can be accessed through the retention period of the records.

**Closure of an Administrative Site**

**When an institution decides to close an administrative site, it must notify the Executive Director by submitting a Letter of Notification at least 30 days before the site is closed. The Letter must provide the following information:**

1. **Name, address, and telephone number of the site.**

2. **The date and reason(s) for closing the administrative site.**

3. **Personnel names, titles, and job descriptions affected by the closing.**

4. **Information explaining what duties were carried out at the administrative site and where those duties will be carried out in the future.**

5. **Information on any significant changes in courses/programs or educational services, student support services, etc. resulting from the closure of the administrative site.**

6. **Information on changes to any advertising and promotional materials (including website) resulting from the closure of the administrative site.**

7. **If any official documents were kept at the administrative site, explain when and where the records will be transferred.**

8. **Evidence that the institution has properly notified the appropriate licensing, authorizing, or approving state educational agency concerning the closure of the administrative site.**

Revised ~~March 2013~~ June 2013

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# Proposed Changes to C.9. Policy on Degree Programs
*(approved by Commission 1/10/13 – out for public comment – comments due by May 1, 2013)*

## Standard VII: Admissions Practices

### When Applicant's Native Language is other than English

Applicants whose native language is not English and who have not earned a degree from an appropriately accredited institution where English is the principal language of instruction must demonstrate college-level proficiency in English through one of the following for admission:

- **Undergraduate:** A minimum score of **500** on the paper-based Test of English as a Foreign Language (TOEFL PBT), or **61** on the Internet Based Test (iBT), **a 6.0** on the International English Language Test (IELTS) or 44 on the PTE** Academic Score Report. **Master's Degree:** A minimum score of **530** on the paper-based Test of English as a Foreign Language (TOEFL PBT) or **71** on the Internet Based Test (iBT), **6.5** on the International English Language Test (IELTS) or 50 on the PTE Academic Score Report; **First Professional Degree or Professional Doctoral Degree**: a minimum score of **550** on the paper-based Test of English as a Foreign Language (TOEFL PBT), or **80** on the Internet Based Test (iBT), a **6.5** on the International English Language Test (IELTS), or 58 on the PTE Academic Score Report.

- A minimum grade of Level 3 on the ACT COMPASS's English as a Second Language Placement Test;

- A minimum grade of Pre-1 on the Eiken English Proficiency Exam;

- A minimum ~~B1~~ **B-2** English proficiency level identified within the Common European Framework of Reference (CEFR) standards and assessed through various ESOL examinations, including the University of Cambridge;

- A transcript indicating completion of at least 30 semester hours of credit with an average grade of "C" or higher at an appropriately accredited* accredited college or university where the language of instruction was English; "B" or higher for Master's, First Professional Degree or Professional Doctoral Degree.

- ~~A transfer transcript indicating a grade of "C" or higher in an English composition course from an appropriately accredited* college or university; "B" or higher for Master's, First Professional Degree or Professional Doctoral Degree; or~~

- **Undergraduate only:** A high school diploma completed at an appropriately accredited/recognized high school (where the medium of instruction is English).

# 14.  Policy on Student Achievement and Satisfaction

*(approved by Commission 1/10/13  - out for public comment – comments due May 1, 2013)*

This Policy sets forth the Accrediting Commission's definitions, interpretations, and expectations of what constitutes compliance with Standard V, Student Achievement and Satisfaction. This Policy provides a general overview on how the Accrediting Commission and its on-site evaluators will apply and judge evidence presented by postsecondary institutions to demonstrate acceptable *institutional outcomes assessment programs which include* satisfaction of students, ~~course completion/~~program **completion/**graduation rates*, and evidence of achievement of student learning outcomes. Institutions must also demonstrate how student learning outcomes relate to institutional learning outcomes and/or institutional goals and objectives.  (1/13)*

Institutions are expected to have in place a formal written and actively executed plan for conducting outcomes assessment and satisfaction studies in order to show compliance with Standard V. *Additionally, institutions must show evidence that this data is analyzed and considered in its quality improvement efforts at the course, program, and institutional levels (see Table B). (1/13)*

Each institution is required to submit data that demonstrate acceptable student achievement and satisfaction, including data from student learning outcomes assessments *that is both direct and indirect. Indirect measures should include* student surveys, completion/graduation rates, placement rates *(where applicable), and applicable employment rates. Examples of direct measures should include student assessment portfolios, authentic assessment procedures capstone projects and test results. Each institution must also demonstrate evidence of how this data drives quality improvement activities and should be prepared to demonstrate how this data is disclosed to the public. (1/13)*

The Commission expects each institution to demonstrate acceptable student achievement and satisfaction based on valid and reliable assessment techniques. To this end, the institution will collect and analyze relevant data and use them to demonstrate compliance with Standard V. The evidence that **must** be provided by the institution to the Commission is described below. For additional information, please see the DETC Glossary found in Appendix E.16.

## Introduction

*DETC* standards have always required that institutions have an ongoing procedure to demonstrate that students have (1) attained the required learning outcomes, and (2) been successful in achieving the benefits established for a ~~course or~~ program. Institutions have had to show that a high proportion of students are satisfied with the educational services provided, and that a satisfactory percentage of enrolled students finish the **program** ~~course~~, *and when applicable program, as defined by metrics that are provided by the Commission. (1/13)*

*This Policy also provides a road map to how institutions can make use of outcomes assessment to enhance their internal processes and strengthen their programs to become the best educational provider that they can be. (1/13)*

## The Three Pillars of DETC Outcomes Assessment

1. **Student Achievement.** The institution has a systematic and on-going process for assessing student learning that uses both direct and indirect measures of learning outcomes assessment to show achievement of ~~course and~~ **the** program outcomes. *A sample degree program outcomes table is available in Table B. (1/13)*

2. **Perceived Student Satisfaction.**  In addition to the Outcomes assessments indicated above, the Commission will use the overall assessments made by the students taking the ~~course~~ **program** as additional indicators of student success and satisfaction.

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3.  **Completion/Graduation rates**. These numbers show how many students were able to complete a ~~course~~ **program** of study and pass all assignments and assessments required ~~by the institution,~~ *or graduate from an entire degree program, and whether the completion or graduation rates fall within the range of comparability to peer institutions. (1/13)*

## The Standards for Student Achievement and Satisfaction

Accrediting Standard V.A. addresses three specific areas *(#1 and #2 were revised 1/13)*:

**1. Achievement of Student Learning Outcomes:**  When an institution undergoes its initial or re-accreditation examination, it must provide in its Self-Evaluation Report (SER) both a formal written plan ("outcomes assessment plan") for regularly conducting student learning outcomes assessments for all of its courses/programs and documentation that it follows the plan. This plan must also include documentation as to how data regarding student learning outcomes is used to assess institutional outcomes and/or goals and objectives. Each accredited institution must confirm that it meets this requirement by initialing the appropriate statements in "Section II. Certification of Compliance with Commission Requirements" in its Annual Report to the Commission and by providing a narrative on its continuous improvement results.

The institution must demonstrate and document in its SER through results of learning outcome assessments that students achieve learning outcomes that are appropriate to its mission and to the rigor and depth of the degrees or certificates offered. The institution must also describe how its outcomes assessment plan has contributed to the improvement of the institution over time and explain how the plan demonstrates that the institution is fulfilling its stated mission. This is referred to as "closing the loop." It is an important step in the cycle of outcomes assessment. It is the process by which the institution uses evidence of student learning to gauge the effectiveness of the educational practices and methodologies, and to identify and implement strategies for improving student learning. It is not enough to just collect data. The data must be analyzed and put to use.

"Assessment" is an ongoing process aimed at understanding and improving student learning. When developing an outcomes assessment plan, an institution should consider: 1) what it wants students to be able to do or know, 2) how it knows they can do it or know it, and 3) how it will use the information received to improve teaching and learning. The plan should begin with a solid set of learning goals and outcomes that are quantifiable, realistic, and measurable.

The institution's outcomes assessment plan should describe the different areas assessed, the methods of assessment and when they are used, and how it interprets and uses the results. The tables found at the end of this document are provided to suggest some possible resources for methods of assessment and when they can be used. Institutions should tailor the data shown in the sample tables to fit their method of assessment and interpretations for their institution's courses and/or programs and institutional outcomes and/or goals and objectives.

The institution must use both direct and indirect measures of outcome learning assessments to show achievement of course and program outcomes, and provide documented evidence that shows that the results are used to improve programs, curricula, instruction, faculty development, and services. The following is a listing of currently accepted direct and indirect measures learning outcomes assessment that may be used to satisfy the outcomes requirement:

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**Direct measures** require students to demonstrate knowledge and skills and provide data that directly measure achievement of expected outcomes. Examples may include but are not limited to:

A. **Capstone Course (or experience):** A capstone course, project, or practical experience integrates the knowledge, concepts and skills associated with an entire sequence of study within a discipline or program. The structure and content of a capstone experience is linked to a discipline/program's goals and objectives for student learning. Capstone experiences provide students with a forum to combine various aspects of their program/discipline experiences. Capstone experiences provide faculty and programs/disciplines with a forum to assess student academic achievement in a variety of knowledge and skills based areas by integrating their educational experiences.

B. **Embedded Assessments:** Assessment practices embedded within courses generate information about what and how students are learning within the programs/disciplines. This form of assessment takes advantage of existing curricular strategies. Common embedded assessments include student projects, papers, and questions placed in course assignments. These projects, papers or questions are intended to assess student outcomes. Embedded assessments are incorporated into all sections of the particular course or discipline whether taught by full-time faculty or part-time instructors. Best Practices recommend that the student work and/or responses are evaluated by faculty other than the course faculty member or outside reviewers to determine if students are achieving the academic goals established by programs.

C. **Internship Performance:** Performance in a real-world setting is assessed through the use of a rubric. Students are assessed in their program/discipline specific job skills, knowledge, and in their ability to interact professionally.

D. **National Licensure, Certification, or Professional Examination**: These standardized tests are developed by outside, professional organization to assess general knowledge in a discipline. Examples include the Bar Exam, State Medical related exams, Certified Safety Professional (CSP), CISCO Certified Network Associate exam, and Law Enforcement Academy exam (POST: Peace Officer Standard and Training). In any case where the outcome of a course or programs is demonstrable through performance on outside assessments, such as those required for employment in a profession for which the program trains graduates, institutions will be expected to provide any data available to them that shows this outcome.

E. **Portfolio Assessment:** Portfolios are collections of student work that exhibit, to the faculty and student, the student's progress and achievement in a program or discipline of study. A portfolio used for assessment purposes can include research papers and reports, examples of student work, projects, self-evaluations, journals, case studies, as well as others.

F. **Pre/Post Testing:** This form of assessment is used to determine what a student has learned. A test or similar assignment is given at the beginning of a course or program and a similar test or assignment is given at the end. This form of assessment is helpful in measuring both cognitive and attitudinal development.

G. **Standardized Examinations:** There are two types of standardized tests: norm-referenced and criterion-referenced examinations. Norm-referenced exams describe performance in comparison to others, while criterion-referenced exams describe student performance directly and judges that performance by some preset standard.

H. **Outside Assessors:** Assessments of student pre and post work completed by outside assessors who rate student attainment of outcomes as compared to students at other institutions that have completed similar programs.

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I. **Approved Thesis or Dissertation**: This category would include approved theses, research projects or dissertations that have been judged and approved by a committee.

**Indirect Measures** are an indirect assessment of student learning since they measure student, graduate or stakeholders' satisfaction and impressions of educational experiences, rather than knowledge and skills acquired. However, when combined with direct measures of learning, indirect assessments can provide a comprehensive pathway to enhance student academic achievement. Evidence should be available to demonstrate that it actively seeks student (and/or stakeholder feedback, when applicable) on its courses and programs. Indirect measures may include but are not limited to:

A. **Student Learning Assessments:** End-of-course student surveys is an example of the indirect measures that can used to show that learning outcomes are being achieved.

B. **Graduate and Alumni Surveys:** Graduate surveys have assisted in understanding the educational needs of the students. Former students can provide important information about both the curriculum and co-curricular activities. Information can include student insights on educational experiences, what they like or dislike about different instructional approaches, impressions about the classroom environment, program equipment and technology levels, perceived benefits from student and instructional support services, and value of education to their work experiences and career goals.

C. **Employer Surveys:** Employer surveys provide useful information about the curriculum, programs, and students that other forms of assessment cannot provide. Employers provide information about skill levels of recent graduates, abilities to communicate effectively verbally and in writing, specific program competencies, and abilities to utilize current program-specific technology. Employer surveys help us determine the relevance of educational experiences and programs.

D. A**dvisory Board Feedback:** Information from advisory board meetings such as recommendations on program improvement, current practices or curriculum updates may be used as an indirect measure.

E. **Benchmarking Against Other Institutions:** Results of standardized test, licensure pass rates or any number of other measures can be compared to other schools' performance on the same measures.

**2. Perceived Student Satisfaction:** The institution documents that students are satisfied with the instructional and educational services provided. A standard part of DETC accreditation has been an evaluation of student responses to survey questions designed by the Commission. Students in DETC-accredited institutions fit a profile, and most are older and perform roles other than that of student. They are adequate judges of whether the program delivered what it promised.

The following are guidelines for completing the student satisfaction assessment. First, questions designed to elicit the measure of satisfaction are asked of some annually. Second, a baseline has been established. The Commission has developed three questions to be asked of randomly selected students. For each course or program offered by an institution, three of every four students responding to a random survey must answer positively about their experiences. (1/13)

**3. Progress Through the Course/Program:** The institution documents that students complete their studies at rates that compare favorably to those of courses/programs offered by similar DETC accredited institutions **or benchmarks set by the Commission.**

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Although these rates have long been included in DETC accreditation decisions, the nature of distance education and its students make them a less useful indicator of course outcomes than they may be in traditional education. Where adult students are responsible for their educational choices, they may decide that their personal goals have been reached before completing the course. Open enrollments, and "study anytime" opportunities result in noticeably lower completion rates for distance education. Institutions offering identical courses in both resident and distance modes report consistently lower graduation rates from the distance education offerings, and over the years many fine institutions of unquestioned effectiveness have demonstrated that high student success can exist alongside low course/program completion/graduation rates.

These rates will now have benchmarks designed to identify areas in need of Commission attention. DETC members will be assigned to one of several peer groups, dependent upon whether the courses are educational, vocational, or avocational, the level of degree or credential offered, and other factors. In order to make it statistically valid, there must be at least five institutions in a peer group. A benchmark completion rate representing the average completion rate of all programs in the peer group will be determined for each peer group. ~~Courses~~ **Vocational programs** with completion rates within 15 percentage points of the mean for the group will be considered to meet the benchmark. Graduation rates within 15 percentage points of the mean for the assigned degree level will be considered to meet the benchmark.

If the Commission's analysis does not show that the institution's data compare favorably with those of similar DETC-accredited institutions, the institution must provide a written explanation, and the Commission will review the institution's explanation and take whatever follow-up action it deems appropriate. Such action may include (1) accepting the institution's explanations and taking no further action; (2) determining that the institution may no longer offer the ~~course~~/program in its present form, and/or (3) ordering the institution to undergo a full accreditation review if the institution does not make the appropriate changes.

**Definitions of Standard V. Terms**

**Outcomes** are specified knowledge, skills, abilities, or attitudes a student has achieved as a result of completing a course or program. A "student learning outcome" is a particular/specified level of knowledge, skill, and ability a student has achieved as a result of his/her engagement in a particular/specific instructional experience or set of instructional experiences.

**Completion** refers to completing a **vocational (noncredit bearing) program** ~~course~~; **graduation** refers to completing an entire **degree** program consisting of several courses, such as an ~~academic degree, e.g.,~~ Associate's, Bachelor's, Master's, ~~or~~ First Professional **or Professional Doctorate** degree. ~~and~~ **course** ~~is defined as units of learning activities that result in the award of a diploma, certificate, or academic credit when completed.~~

**Benefits** are anything that contributes to the improvement of the graduate or his or her status. Benefits from completing a ~~course or~~ program can include such items as increased knowledge, career promotion, salary increase, improving a skill, qualifying for a new job, or personal satisfaction.

## Student Satisfaction

The Commission defines "**student satisfaction**" as evidence presented by an institution that shows that the students and graduates of the institution have expressed their overall satisfaction with the **lessons/**courses and services as they have experienced them.

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Student satisfaction can range from whether the course**/lesson** materials were current and comprehensive to whether grading services were prompt and fair and if faculty members have performed adequately. Student expressions of satisfaction are normally attained through institution surveys, but an institution can also gather and present data such as unsolicited testimonials, referrals of other students, and repeat enrollments in new or subsequent courses.

The students' expression of their own satisfaction is another form of evidence used to document outcome achievement. The institution must provide evidence that demonstrates that students are satisfied with the instructional and educational services provided. It must provide evidence in its Annual Report by reporting the **required** ~~following~~ data. In addition, an institution undergoing initial or re-accreditation must also provide evidence in its Self-Evaluation Report.

To measure student satisfaction, the institution must survey the students in each of its **vocational programs or** courses**/degree programs**. When reporting information to the Commission in its Annual Report, an institution will be asked to report the number and percentage of "Yes" responses to the three questions below from 10 of its most popular **vocational programs and/or** courses (as defined by number of enrollments). If an institution has more than one division, e.g., vocational and/or degree granting, it must choose 10 courses**/programs** from each division. *The institution should aim for at least a 30% response rate to its surveys. (1/13)*

**Degree-granting:** A "**course"** is defined as units of learning that result with the award of a ~~diploma,~~ certificate, or academic credit when completed. Examples of course titles are~~, "Jewelry Design,"~~ "American History," or "Business Management."

**Vocational: A "program" is defined as units of learning that result with the award of a diploma or certificate (non-academic credit). Examples of program titles are "Medical Billing," or "Interior Design."**

The institution **must** include in its surveys the following **three questions** and use the "Yes-No" response. The questions are worded so that they apply to students who have dropped out, are still studying, or who have completed the course/program:

1. Did you achieve, or will you have achieved upon completing your studies, the goals you had when you started this course or program?

2. Would you recommend these studies to a friend?

3. All things considered, were you satisfied with your studies with us?

The minimum acceptable "Yes" response rate is that three of four responders (or 75%) must answer "Yes" to **each** of the three mandatory questions. If the institution receives less than 75% for those who answered "yes" to the three questions, the institution must provide a written explanation, and the Commission will review the institution's explanation and take whatever follow-up action it deems appropriate. Such action may include (1) accepting the institution's explanations and taking no further action; (2) determining that the institution may no longer offer the course/program in its present form, and/or (3) ordering the institution to undergo a full accreditation review if the institution does not make the appropriate changes.

The institution may determine the time frame for collecting the survey data. The institution will be asked annually to provide a sample of the surveys used and a description of how they were conducted. The  description should include the name of all 10 courses**/programs,** the time frame used to collect the data, and the number and percentage of

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"Yes" answers to questions 1, 2, and 3 above.  The institution should aim for at least a 30% response rate to its surveys. Evidence should be available to demonstrate that it actively seeks student feedback on its courses/programs.

**Example of Survey Data**

An institution offers a course in Business Management. During the calendar year 20**12**, the institution sends a survey that includes the three mandatory questions to the 700 students who enrolled in the course that year including those students who dropped out (110), those who complete the course (400), and those still studying (190). The institution received 10 surveys stamped as undeliverable, which makes the Survey Sampling 690 (110 + 400 + 190 = 700 – 10 = 690). The institution received 210 completed surveys, which makes the Return Rate 42% (210 divided by 690 = .304 or 30%). Of the 210 completed surveys received, 200 answered "Yes" to question 1; 189 answered "yes" to question 2; and 205 answered "yes" to question 3. Along with a sample of the survey, and a description of the survey method, the institution would send the following information to the Commission in its Annual Report:

| | |
|---|---|
| Name of Course: Business Management | |
| Time Frame of Survey Sample: 1 year (20**12**) | # and % Answering "Yes" to question 1: 200 or 95% |
| Survey Sampling: 690 | # and % Answering "Yes" to question 2: 189 or 90% |
| Number of Completed Surveys Received: 210 | # and % Answering "Yes" to question 3: 205 or 98% |

If the percentages of those answering "Yes" to any of these questions are below 75%, the institution must provide a written explanation, and the Commission will review the institution's explanation and take whatever follow-up action it deems appropriate. Such action may include (1) accepting the institution's explanations and taking no further action; (2) determining that the institution may no longer offer the course/program in its present form, and/or (3) ordering the institution to undergo a full accreditation review.

**Progress Through the Course/Program**

**Please Note: Beginning with the 2013 Annual Report, degree-granting institutions are no longer required to report course completion rates in their Annual Reports as evidence of progressing through a degree program. However, tracking and reporting course completion rates is still a requirement of an institution's initial or reaccreditation process and as an element of an institution's outcomes assessment plan.**

The institution must demonstrate that students complete their studies at rates that compare favorably to the rates of students enrolled in similar ~~courses/~~programs offered by similar DETC-accredited institutions. The Commission defines "compare favorably" as meaning completion **(for vocational programs)** or graduation rates **(for degree programs)** that do not fall below 15 percentage points of the mean completion or graduation rate for similar ~~courses or~~ programs at similar DETC institutions. Groups must be made up of at least five institutions. ~~Groups must be made up of at least five institutions.~~ A benchmark completion**/graduation** rate representing the mean completion**/graduation** rate of all ~~courses~~ **programs** in the peer group is determined for each peer group. ~~Courses~~ **Vocational programs** with completion rates within 15 percentage points of the mean for the group will be considered to meet the benchmark. Graduation rates within 15 percentage points of the mean for the assigned degree level will be considered to meet the benchmark. The Commission will collect, analyze and compare the data from the institution's Annual Report or Self-Evaluation Report, and notify the institution if it falls below the 15 point limit. **The Commission will set the mean completion rate annually. The Commission will review the reported institutional data for accuracy and consider other available relevant industry data and studies.**

For an institution undergoing initial or re-accreditation, the Commission staff will provide the on-site evaluators with the data from similar ~~courses/~~programs offered by similar DETC-accredited institutions in order to help them

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determine if it meets Standard V.C. The evaluators will also consider the data provided in the institution's Self-Evaluation Report when making their determination.

For the purposes of calculating the **program** completion and graduation rates, the term "**completion**" indicates that a student completed **a vocational or noncredit bearing program** ~~an individual course or semester~~, while the term "**graduation**" means that a student completed the entire degree program. ~~A "**course**" is defined as units of learning activities that result in the award of a diploma, certificate or academic credit when completed.~~

The institution must collect completion data on each ~~course/certificate~~ **vocational or non-credit bearing program** and graduation data on each degree program. **For the purpose of the Annual Report, an** institution will be asked to report **the following**:

- **Vocational or non-credit bearing programs: Completion data on each program, such as "Medical Billing" or "Interior Design."**
- ~~Completion Data: Completion data on courses offered as independent offerings and certificates as indicated in the institutions catalogs. This includes non-credit offerings such as vocational and/or training courses. This excludes10 of its most popular courses (as defined by number of enrollments) when reporting information to the Commission in its Annual Report. If an institution has more than one division, e.g., vocational and/or degree granting, it must choose 10 courses from each division.~~
- **Degree Program Graduation Rates:** If the institution offers degree **programs, it must** ~~also~~ **supply graduation data for each degree program** ~~(see below).~~

**Completion Data for Vocational (non-credit bearing) Programs:** ~~for Courses or Semester:~~

The institution must collect and report the following data: ~~for the courses or semester specified above:~~

    Name of ~~Course(s)~~ Program
    ~~Unit of Measurement~~ **Number of Lessons in Program**
    Date **Range** of ~~Sample~~ **Cohort**
    Number of Students in ~~Sample~~ **Cohort**
    Number of ~~Cancellations~~ **Exclusions** (as defined below)
    Number of ~~Active~~ Students in ~~Sample~~ **Net Cohort**
    Students Completing
    Completion Rate

To determine the "Unit of Measurement," an institution should consider how a student enrolls in a ~~course or~~ program. The unit of measurement should be based on the segment of curricula a student is contracted to pay for (what he or she signed up for and are financially committed to according to the contract). ~~If it is by semester in a degree program, then the institution should use a semester (specify the number of credits, usually 15) as the unit of measurement to determine the completion rate.~~

The institution should select a ~~random sample~~ **cohort** of ~~names of people~~ **students by a date range** who started the ~~course/semester~~ **program,** i.e., submitted at least one lesson/assignment, and track them for a determined time. The institution should select ~~enough names~~ **a cohort using a large enough date range** so that it ends up with at least 100 ~~randomly selected people~~ **students** who would have had sufficient time to complete **the program** ~~the course/semester~~. To determine the time frame, the institution should allow enough time so that the last student who enrolled in that ~~course/semester~~ **program** has had enough time to complete it. For example, if it normally takes a

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student one year to complete the **program** ~~course/semester~~, then go back one year and select ~~randomly~~ **a cohort of at least** 100 ~~names~~ **students** prior to that date. *Institutions may elect to use the same reporting period that is used when submitting completion rate data to state and/or federal agencies, if applicable. (1/13)*

To calculate the "Completion Rate," take the number of students ~~who enrolled~~ **in the cohort**, subtract the **exclusions** ~~cancellations~~ (see following definition), giving you the total ~~active students~~ **net cohort**. Take the number of students who completed the course and divide it by the number ~~of active students~~ **in the net cohort**. ~~Cancellations~~ **Exclusions** are defined as those who dropped during the 5-day (or the amount of time specified) cancellation period, those who never submitted any required assignments/ examinations, those who were cancelled by the institution for non-payment, those who never provided the required information to be enrolled in the **program,** ~~course~~ such as not **submitting a high school diploma if it is required** (non-compliance), and those who were granted extensions or may still be studying (active). The difference between the number ~~of active students~~ **in the net cohort** and the number of those who completed are the "drop-outs" (those students who are not active [see definition below] ~~or those who have official withdrawn from the course).~~ **An Active Student is an enrolled student who has submitted at least one examination/lesson to an institution for grading/servicing during the** ~~institution's~~ **designated period of time established as the criteria for making satisfactory progress.** ~~, or one who has affirmed in writing his/her intent to continue studying.~~

### *Example for* ~~*Course/Semester*~~ *Completion Rates*

An institution offers a course in "~~Computer Technology~~ **Medical Billing**." It normally takes a student 12 months to complete this course. **Students have the option to extend the course up to 30 days.** If today's date were January ~~2002~~ **2013**, the institution would select the first 150 ~~people~~ **students** who enrolled in the course before ~~January~~ **December** ~~2001~~ **2011**. Tracking the 150 people selected showed that 10 people dropped the course during the 5-day cancellation period, 15 people never submitted any assignments or examinations (non-starts), 10 people were cancelled for not paying, 5 people were disenrolled for never providing ~~the institution with an official transcript~~ **required documentation** and 10 ~~people~~ **students are still studying on a** ~~were granted~~ **special** military extensions. This leaves 100 ~~active~~ students **in the net cohort**. Of the 100 ~~actives~~ students **in the net cohort**, 30 are still enrolled but not active or officially dropped and 70 completed the course. ~~An Active Student is an enrolled student who has submitted at least once examination to an institution for servicing during the institution's designated period of time established as the criteria for making satisfactory progress, or one who has affirmed in writing his/her intent to continue studying.~~ To calculate the completion rate, take the number of student who completed the course (70) and divide it by the number ~~of active~~ **in the net cohort** ~~students~~ (100), which gives you a completion rate of 70%.

| | | |
|---|---|---|
| ~~People~~ **Students** who enrolled: | | 150 |
| ~~Cancellations~~ **Exclusions**: | | |
| ~~People~~ **Students** who cancelled before 5-days: | | - 10 |
| ~~People~~ **Students** who never submitted exams: | | - 15 |
| ~~People~~ **Students** who institution cancelled for non-payment: | | - 10 |
| People **Students** who were in non-compliance: | | - 5 |
| Students granted extensions **: | | - 10 |
| Total ~~Cancellations~~ **Exclusions**: | | - 50 |
| ~~Active Students:~~ **Net Cohort:** | | 100 |
| | | |
| Students who completed course: | 70 | |
| Divided by 100 (~~active students~~ **net cohort**) = | 70% | |

~~*All of these equal "cancellations."~~
** Extension may be for stop out, leave of absence, active duty, etc. or still studying

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For this course, the institution would provide the following information:

| | |
|---|---|
| Name of course: **Medical Billing** | *Number of **Exclusions:** 50 |
| Normal Time to Complete: **13 months** | Number **in Net Cohort: 100** |
| Date of Sample: **January 1, 2011 – November 2011** | Students Completing: 70 |
| ~~Number of Students in Cohort: 100~~ | **Net Cohort**: 70% |

**~~Completion or~~ Graduation Rate for Degree Programs:**

Each institution must collect and report ~~the~~ **graduation rates at 150% of Normal Time** ~~following data~~ for its academic degree programs **as defined below**:

> ~~Name of Degree~~
> ~~Years to Complete~~
> ~~Years in Sample~~
> ~~Number of Students in Sample~~
> ~~Cancellations (as defined below)~~
> ~~Number of Active Students in Sample~~
> ~~Students Graduating~~
> ~~Graduation Rate~~

- ~~Depending on the number of students enrolled in each degree program, the institution should select a random sampling. The sampling should include enough students to give a true picture of the graduation rate for the program. The institution should select, randomly, sample names of people who started the degree program, i.e., submitted at least one assignment, and can be tracked for a determined time. The institution should randomly select an appropriate number of students (at least 25%, not to exceed 100) who would have had sufficient time to complete the program.~~

- **Normal Completion Time: DETC has adopted the definition developed by the Joint Commission on Accountability Reporting (JCAR) as a definition of normal time. Normal time is defined as "the time necessary for a student to complete all requirements for a degree ~~or certificate~~ according to an institution's catalog." This is typically 4 years for a Bachelor's degree, 2-3 years for an Associate's degree, 2-3 years for Master's and 4 years for First Professional and Doctoral programs.**

- **Date Range of Cohort to be Measured: Normally the date range is an academic year as defined by the institution but may be an enrollment period within an academic year (i.e. Fall Semester). Select the most recent academic year in which new students enrolling in that period would have had time to complete as determined by calculating 150% of Normal Time.**

- **Number of Students in Cohort: The cohort should include all new students (not a random sampling) enrolled in the program in the academic year or enrollment period.**

- **Exclusions: Determine the students in the cohort that should be excluded. Excluded students are those who never completed three semester credits or equivalent, dropped in the 5-day cancelation period, were cancelled for non-payment, are still studying (enrolled in a course or submitted coursework within the last six months) or were not fully accepted into the program.**

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- **Net Cohort: "Number of Students in Cohort" minus "Exclusions." The net cohort includes students who have graduated, withdrawn, stopped out, or are still attending.**

- **Students Graduating: Number of students in the cohort who earned their degree by completing all program requirements.**

- **Graduation Rate: Number of "Students Graduating" divided by number of students in the "Net Cohort."**

~~To determine the time frame, the institution should allow enough time so that the last student who enrolled in that program has had enough time to complete it. For example, the *2010 DETC Survey* of its accredited degree-granting institutions showed that the average time it took for students to complete an Associate degree was 4 years, a Bachelor's 4 years, a Master's 3 years, a first professional 4 years; and professional doctorate 4 years.~~

~~To calculate the "Completion Rate," take the number of students who completed the program and divide it by the number of people who enrolled (**do not** include those who dropped during the 5-day cancellation period, those who never submitted any required assignments/examinations, those who were cancelled by the institution for not paying, those who never supplied the appropriate information to be properly enrolled or fully accepted in the program, those who were granted extensions and those still studying.)~~

*Example of Graduation Rate for a Degree Program*

An institution has ~~had 80~~ **600** ~~enrollments~~ **students** in its MBA program since it began 5 years ago. **The institution indicates that normal time for students to complete all requirements of the program is four years and therefore 150% of normal time is six years (1.5 x 4 = 6).** ~~Since it normally takes three years to complete a Master's degree, the institution randomly selects 25% of those enrolled in the entire program or 20 students who enrolled at least 3 years ago.~~ **The institution therefore reports on the cohort of new MBA students enrolled in the academic year six years in the past.** ~~For this example, the institution selects a date of January 1998. Tracking 20 randomly selected students from the time they enrolled until January 2001~~ **Of the 150 new students enrolled,** the institution determines that ~~1~~ **5** student cancelled within 5 days, ~~2~~ **15** students never ~~submitted any work~~ **completed three academic credits, 5 students are still actively studying,** and ~~2~~**10** students were dropped due to lack of payments. ~~You may also deduct students who were granted extensions and those still studying.~~ **To calculate the Net Cohort, the institution takes 150 and subtracts 35 students to equal 115.** ~~This leaves 15 active students. During this time~~ **Within the Net Cohort,** ~~12~~ **74** students graduated with **an** MBA degree. To calculate the graduation rate, take the number of students who completed the entire program (~~12~~ **74**) and divide it by the number of actives students (**115**), which gives you a graduation rate of ~~80~~**64**%.

For the example, this is how the number of active students was determined:

~~People who enrolled in degree program~~ **Students in the cohort:**          ~~20~~     150

~~Cancellations~~ **Exclusions**:
    People who cancelled before 5-days:                                      -5
    People who never ~~submitted exams~~ **completed three credits:**          -15
    People who were cancelled for non-payment:                          -10
    People ~~not properly enrolled~~ **never fully accepted**:                    0
    Students ~~granted extensions or~~ still studying:                         0
    Total ~~Cancellations~~ Exclusions:                                       -35
~~Total Active~~ **Net Cohort** ~~Students~~:                                           115

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Total Students who completed degree:                                        74

Graduation Rate:                                        74/115 = .64 or 64%

The institution would provide the following information:

| Name of Degree: MBA Program | Exclusions (per above): 35 |
|---|---|
| Normal Time to Complete Program:  4 years | Net Cohort: 115 |
| Date of Sample: January 1, 2008 – December 31, 2008 | Students Graduating:  74 |
| Number of Students in Cohort: 150 | Graduation Rate: 64% |

**Other Information Considered**

In determining whether an institution undergoing its initial or re-accreditation meets Standard V, the Commission also considers the direct evidence of the results of its own mail survey of students using the "DETC Student Survey Form." An institution must submit 100 names/labels with their application form. If an institution has more than one division, e.g., vocational programs and academic degrees, it must submit 100 names for each division.

The on-site evaluators and the Commission will review the student surveys to evaluate the institution's performance. The survey results from the Commission-administered student survey will be compared to those of institution-administered surveys to establish the validity of the institution's survey results.

The Commission will also consider evidence from: (1) analysis of student complaints received about the institution, (2) information solicited in a survey that the Commission sends to state and federal agencies, consumer agencies, and Better Business Bureaus, and (3) any other data or information it encounters about the institution, regardless of its source.

If an institution feels that it cannot adequately and fairly fulfill the reporting requirements as described in this Guide, it may suggest other ways of providing evidence that it meets Standard V. The Commission will make a determination on a case-by-case basis if the institution's methods of providing evidence are acceptable for meeting Standard V.

For institutions undergoing initial or re-accreditation, the Commission will also consider the results of the Commission-mailed survey of students using the "DETC Student Survey Form" (see Appendix G.1.) when determining whether an institution meets Standard V. The on-site evaluators and the Commission will review the student surveys to evaluate the institution's performance. The survey results from the Commission-administered student survey will be compared to institution-administered surveys to establish the validity of the institution's survey results.

The Commission will also consider evidence from: (1) analysis of student complaints received about the institution, (2) information solicited in a survey that the Commission sends to state and federal agencies, consumer agencies, and Better Business Bureaus, and (3) any other data or information it encounters about the institution, regardless of its source.

**Commission's Review**

The Commission will review the data supplied in the institution's Annual Report and will compare the completion

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and graduation rates with similar institutions offering similar courses/programs and degree levels. To make the comparison, the Commission staff will determine which institutions and programs are similar. For institutions undergoing initial or re-accreditation, the on-site evaluators and subject specialists will review the information in the Self-Evaluation Report and make the comparison with Commission-supplied data.

To be considered a "favorable comparison," a course or program must not fall below 15 points of the mean completion rate for similar courses or programs for the institution's assigned peer group. The graduation rates for degree programs will be compared with graduation rates for similar degree levels, e.g., Associate, Bachelor's, Master's, First Professional, and Professional Doctorate. The Commission reviews the completion and graduation rate data reported for accuracy, considers other industry data, and sets the benchmark.

If the Commission's analysis does not show that the institution's data compare favorably with those of similar DETC-accredited institutions, the institution must provide a written explanation of its data and how they were gathered and the Commission will review the institution's explanation and take whatever follow-up action it deems appropriate. Such action may include (1) accepting the institution's explanations and taking no further action; (2) determining that the institution may no longer offer the course/program in its present form, and/or (3) ordering the institution to undergo a full reaccreditation review if the institution does not make the appropriate changes.

**Annual Reporting of Continuous Improvement Results** *(added 1/13)*

Starting with the 2013 DETC Annual Report (E.6 or E.7) the CEO will be asked to initial that his or her institution has "formal written plans for regularly conducting student learning outcomes assessments and institution self-improvements."

The 2013Annual Report will also require institutions to document the activities or improvements which were made during the reporting year based directly on the results of their outcomes assessment efforts. These institutional changes or improvements can be minor or major, depending on the data collected. The following Table B provides a sample.

**Conclusion**

The Accrediting Commission will judge the acceptability of the case an institution makes for meeting Standard V by looking at all of the evidence and the thoroughness, clarity, and adequacy of the documentation presented in the Self-Evaluation Report and Annual Report.

When an institution is undergoing its initial accreditation or re-accreditation review, the on-site evaluators will review and evaluate the information provided by the Commission and by the institution against the minimum levels of acceptance described above. They will also determine if there are any extenuating circumstances that should be considered in the case of an institution whose performance falls below minimum acceptable levels.

If the Commission's analysis shows that the institution's outcomes data do not meet the prescribed minimum acceptable levels, the institution must provide a written explanation and the Commission will review the institution's explanation and take whatever follow-up action it deems appropriate. Such action may include (1) accepting the institution's explanations and taking no further action; (2) determining that the institution may no longer offer the course/program in its present form, and/or (3) ordering the institution to undergo a full accreditation review if the institution does not make the appropriate changes.

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Evidence provided by the institution must be relevant, verifiable, representative, and cumulative. It may not be modified to produce a desired outcome. Hence, the **burden of proof is always on the institution** to show how its evidence meets Standard V.

When an institution believes that it operates under conditions where assessing outcomes can be achieved more accurately by using standards other than those listed in this Policy, it may petition the Commission for a variance. Where the Commission believes that any such variance or reinforcement of the established standard will improve the assessment of objectives and outcomes, it will grant a variance.

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## Sample Contents of an Outcomes Assessment Plan

| Item | Elements |
|---|---|
| **Overview** | Why the plan is written; what it seeks to accomplish or its purpose; who is responsible for implementing plan; principles of learning assessment; implementation timeline; review of plan |
| **Assessing Student Achievement** | |
| Introduction | Overview |
| Identifying Program and Course Objectives | Define and identify the learning goals and outcomes; identify what the students will be able to do or know; and identify how this is determined |
| Outcomes Measurement Tools | Course Completion Rates; Capstone course; Embedded Assessments; Internship Performance; National licensure, certification or Professional Exam; Portfolio Assessment; Pre/Post Testing; Standardized Exam; Outside Assessors; and Committee Approved thesis o research project. |
| Review of Student Achievement Results | Data that demonstrates that students are achieving learning outcomes that are appropriate to the institution's mission; data demonstrates as to the rigor and depth of the degrees, diplomas, or certificates offered |
| Reporting Student Achievement Results to DETC | Report any third-party assessment results, such as test scores on industry examinations or certifications as compared to national average scores, etc. |
| Using Student Achievement Results to Improve the Institution | Revise as needed to improve outcomes. |
| **Assessing Student Satisfaction** | |
| Introduction | Overview |
| Student Satisfaction Measurement Tools | Student surveys, unsolicited testimonials; referrals; repeat enrollments; few student complaints; end of course evaluation; graduation survey |
| Review of Student Satisfaction Results | How often tools are reviewed; who is responsible; what are the benchmarks? |
| Reporting Student Satisfaction to DETC and Other Agencies | Surveys of 3 mandatory questions must be reported to DETC in Annual Report each year due January 31 |
| Using Student Satisfaction Results to Improve the Institution | What happens when the percentage of "yes" to the 3 questions falls below 75%? |
| **Assessing Progress Through the Course/Program** | |
| Introduction | Overview |
| Collecting Data Related to Progress through the Course/Program | Course completion data, program graduation data, time to complete a course, credentialing |
| Review of Progress Data | What happens when a completion rates falls below a certain percent? |
| Reporting Data to DETC | Report completion and graduation rates to DETC in Annual Report each year due January 31. |
| Using Progress Data to Improve Institution | Revise or terminate courses with low completion rates. |
| **Improving the Institution through Outcomes Assessment** | How will the institution use this information to improve teaching and learning, as well as student services, etc.? |
| Instructional and Educational Support Services | Review and revise as needed. Including, but not limited to admissions requirements, admissions practices, progress through program expectations, counseling services, and advisory services. |
| Program Objectives and Curriculum | Review and revise as needed. |
| Course Objectives, Content, Instructional Materials, and Assessments | Review and revise as needed. |
| Institutional Policies and Procedures | Review and revise as needed. |
| Institutional Mission, Goals, and Objectives | Review and revise as needed. |
| **Attachments:** | |
| Areas Assessed and Methods of Assessment and When it is used | See sample of Table A below. |

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**Table A** – **Areas Assessed and Methods of Direct Assessment (Suggested Approach)**

| Areas Assessed: | Method of Direct Measure Assessment and When It is Used: |
|---|---|
| **Basic Skills** *(reading, writing, math computing)* | standardized tests; pre- and post-test; portfolio at end of course; thesis; pre and post examinations; Embedded assessments; outside assessments. |
| **Competencies** *(critical thinking, oral communication, quantitative reasoning, problem-solving, etc.)* | standardized tests; comprehensive examinations; thesis; internships; capstone projects; portfolio. |
| **Disciplinary Knowledge** | standardized examinations; evaluation by outside instructors; capstone project;; portfolio, thesis; performance on national, state-mandated, comprehensive, standardized, and/or graduate examinations; outside assessments; national licensure. |
| **Technical/Professional Skills** | national licensure or board examinations; practica, internships; capstone project; outside assessment; portfolios; comprehensive examination;  Pre and post testing; Embedded Assessments. |
| **General Education or Core** | pre- and post-test; portfolio; review of student input form; capstone project; student survey; course embedded assessment; outside assessments. |
| **Interdisciplinary Knowledge** | competency examinations; portfolios; capstone project; graduate school admission; evaluation of performance; faculty assessment; outside assessment. |
| **Values** | assessed within context of internship; capstone project; embedded assessments; portfolio; final thesis; pre and post exams; outside assessments. |

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## Table B – Sample Outcomes Assessment Template for a Degree Program [new table]

| Degree Level / Degree Level Guideline: Undergraduate/Associates | | | | | |
|---|---|---|---|---|---|
| Undergraduate/Associates | | | | | |
| **Program** | | | | | |
| College of Arts and Sciences | | | **Associate of Arts in General Studies** | | |
| **Program Mission** | | | | | |
| The purpose of General Studies is to provide foundational knowledge and academic experiences in the humanities and fine arts; history, social, and behavioral sciences; natural sciences and mathematics responsive to the professional, civic and cultural needs of its diverse student population. | | | | | |
| **Program Goals** | **Learning Outcomes** | **Direct Measures** | **Assessment Method: Rubric**<br><br>**Competency Levels-1-Unsatisfactory 2-Satisfactory 3-Competent 4-Exemplary** | **Target** | **Results** |
| A. Students will demonstrate a college-level ability to read and to communicate effectively through speaking, writing, and listening. | 1) Student will be able to employ basic writing skills in order to compose effective and grammatically correct paragraphs. | 1) EH 1010 Unit VI Formal Writing Assignment | 1) Formal Writing Assignment Rubric | At least 80% of students in the sample will achieve at or above competency level 3 for formal writing assignments. | 88% of students scored in competency levels 3 or 4 on the rubric. (mean=3.5) |
| | | 2) SLS 1000 Unit VIII Reflection Paper | 2) Reflection Paper Rubric – Organization and Grammar Criterion | At least 80% of students in the sample will achieve "competent" or "exemplary" on the Organization and Grammar Criterion Component of the rubric. | 92% of students scored "competent" or "exemplary" on the Organization and Grammar Criterion Component of the rubric. |
| | 2) Student will be able to apply effective research and writing techniques for preparing an APA formatted research paper. | 1) EH 1020 Unit VIII Research Paper | 1) Research Paper Rubric | At least 80% of students in the sample will achieve at or above competency level 3 on the rubric. | 77% of students scored in competency levels 3 or 4 on the rubric. (mean=2.7) |
| | | 2) PS 1010 Unit I Article Critique | 2) Article Critique Rubric – Application of Analysis Criterion | At least 80% of students who major in General Studies will achieve at or above competency level 3 on the Application of Analysis Criterion Component of the rubric. | 75% of students scored in competency levels 3 or 4 on the Application of Analysis Criterion Component of the rubric. |

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| | 3) Student will be able to relate the concepts of planning, writing and completing reports and/or oral presentations. | 1) SP 1010 Informative Speech | 1) Informative Speech Rubric | At least 80% of students in the sample will achieve at or above competency level 3 on the rubric. | 85% of students scored in competency levels 3 or 4 on the rubric. (mean=3.4) |
|---|---|---|---|---|---|
| | | 2) SP 1010 Persuasive Speech | 2) Persuasive Speech Rubric | At least 80% of students in the sample will achieve at or above competency level 3 on the rubric. | 85% of students scored in competency levels 3 or 4 on the rubric. (mean=3.2) |

Note: This is a sample outcome assessment plan of only one program goal. An actual plan would include two to four program goals and associated learning outcomes.

**Actions for Improving Student Learning**

For SLO's 1 and 3, students performed at or above the competency level. However, results for SLO 2 indicate that additional activities should be implemented. The following improvements will be implemented:

- A Success Center specialist will be assigned to students with grades below 70% in formal writing assignments in EH1020 and PS1010.

- An APA manual will be provided for all students in the General Studies Program.

- An interactive tutorial on accessing the online library and conducting research will be available for students in the student portal.

- Additional APA activities will be incorporated into EH1020 and PS1010 before the formal writing assignments.

- In order to improve the Application of Analysis Criterion of the rubric, a persuasive paper will be added to the PS1010 course to promote higher level learning.

**Review Cycle**

One goal and corresponding outcomes to be accessed each year.

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| Indirect Measures (Instrument Used) | Criteria | Target | Results: 5-point Likert Scale ("Strongly Agree" = 5 to "Strongly Disagree" = 1) |
|---|---|---|---|
| 1. Alumni and Employer Survey | Survey Question: As a result of my degree from XYZ, I have gained the skills and knowledge required to successfully lead and manage others. | Students will report a mean score of 4.0 for this survey question in 2012. | Mean = 3.8 (vs. 3.6 in 2011) |
| 2. End of Program Survey | Survey Question: As a result of my degree from XYZ I possess the ability to think and act creatively both in my personal life and at the workplace. | Students will report a mean score of 4.0 for this survey question in 2012. | Mean = 3.5 (vs. 3.3 in 2011) |
| **Actions for Improving Student Learning** | | | |
| 1. After reviewing the Alumni and Employer Survey results, we are incorporating collaborative projects to develop characteristics of leadership into the SOC 1234 and PSC 1234 courses.<br><br>2. After reviewing End of Program Survey results, we are adding reflection papers to promote student creativity in the EH 1100 and EH1200 courses. | | | |
| **Review Cycle-Indirect Measures** | | | |
| Each of the above measures will be evaluated by faculty members and academic leadership annually to determine how well students are mastering the material. | | | |

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*(Please Note: This page intentionally left blank.)*

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# 17.  Policy on International Activities

*(approved by Commission 1/10/13 – out for public comment – comments due by  May 1, 2013)*

As stated in C.1. Policy on Substantive Change and Notification, any changes in international activities, including recruiting or partnerships with institutions undertaken outside the U.S. by an institution headquartered in the U.S. is considered a "substantive change" and prior approval is required.

The policy below sets forth the Accrediting Commission's expectations of DETC approved programs that are offered to students outside of the United States of America in concert with partners in other countries. Both currently accredited institutions and applicants for DETC accreditation must observe the provisions below. Applicant or accredited institutions must seek DETC review and approval of any international activities covered by this Policy as a part of their ~~initial~~ application procedure.

Accredited status has always carried with it the expectation that the DETC institution will be held accountable for meeting all accreditation standards, whether programs are offered nationally or internationally. The Commission considers any decision to operate overseas to be a "substantive change."

The Accrediting Commission understands that an institution's international operations may take many forms. There is no need for separate DETC approval when international students enroll directly into a DETC-accredited institution in the United States, when all instruction originates in the U.S., and when marketing and recruitment are conducted by employees stationed in the U.S. and with whom the institution has direct contact.

**Action**

Whenever any major function (training sites, recruiting, instruction, marketing, recruitment, business functions) is performed *outside* the United States, or when branch campuses or coordinating offices are opened in another country, or when the institution contracts with foreign agents or educational entities, including formal articulation agreements, the DETC institution must submit to the Commission in writing a complete description of the international program and activities and submit its contracts for review (see page 6). Significant expansion of an institution's activities overseas may trigger a comprehensive examination of an institution.

The Accrediting Commission reserves the right to order a comprehensive review of an institution at any time it has concerns that the institution is not in compliance with the DETC's standards, policies, and/or procedures.

At a minimum, when a DETC institution offers its programs outside of the U.S. using non-U.S. partners to market, service or otherwise facilitate the programs for non-U.S. students, the institution must comply with the following:

1. All standards for accredited institutions as set forth in the *DETC Accreditation Handbook* apply wherever programs are offered outside of the U.S. The DETC institution offering the program and issuing transcripts, certificates and degrees is fully responsible for ensuring that all DETC standards are met.

2. The institution will include information from its international programs, including the number of enrollments, on its Annual Report to DETC.

3. The institution must ensure that any international partner, agent or employee is held to the same standard of ethical practice and academic excellence as that followed in programs offered in the U.S. International students must also have access to services and resources of a type and at a level equivalent to those available to U.S. students.

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**4.** The institution must exhibit appropriate due diligence before entering into any international partnership or employment agreements. The partner, if not a member of the same corporate/ecclesiastical structure as the DETC institution, must be licensed by or have received the necessary approval or accreditation from the country's higher education oversight organization. **The institution must provide this documentation to the DETC prior to launching any activity with the partner. The DETC will communicate with the country's higher education oversight committee to request that any future actions concerning the partner or the institution be made known immediately to the DETC.**

5. The nature of the arrangement and the duties and responsibilities of each party will be set out clearly for the Accrediting Commission and the public, with special attention being given to activities that are within the scope of DETC accreditation such as advertising, recruitment, instruction, assessment of learning, student services, assignment of grades, record keeping and other tasks that are the normal purview of accreditation standards. If a non-U.S. partner is involved in any overseas activities, or if local recruiters, instructors, marketers or other personnel are hired, then the institution must submit copies of *specimen contracts* to the Commission for review before the program is launched.

6. Any contracts with non-U.S. partners or agents must include language clearly indicating that all parties agree to comply with DETC accreditation standards and policies, and that if such compliance does not occur, it is cause for immediate termination of the contract. If termination occurs, provisions will be made for fulfilling obligations to students already admitted to the program.

   The DETC institution's contractual agreements **and the country's higher education oversight organization approval documents must be** submitted to the Commission for review and approval in advance of their implementation **of the program**. If the Accrediting Commission approves the agreement, the approval will be for a fixed period, and thereafter will be periodically reviewed by the Commission on a schedule it chooses. A contract fee of $500, set forth in DETC's E.1. Fees, will be charged each time there is a DETC contract **and document** review, including any follow-up reviews.

7. Programs offered outside the U.S. must be presented in English, or in the original language of instruction presented to the Accrediting Commission when the program received initial approval. At its election, institutions may offer tutorial or supplemental instruction in a local language to assist student comprehension. In no case will examinations be offered in a language other than English. Faith-based institutions offering religious programs abroad are exempt from this requirement.

8. If English is not the prospective student's native language, and s/he has not earned a degree from an appropriately accredited* institution where English is the principal language of instruction s/he must demonstrate college-level proficiency in English as prescribed in C.9. Policy on Degree Programs.

   *accredited by an agency recognized by the United States Secretary of Education and/or the Council for Higher Education Accreditation (CHEA), or an accepted foreign equivalent that is listed in the International Handbook of Universities.

9. As required by DETC C.9. Policy on Degree Programs, transcripts not in English must be translated into English and evaluated by an appropriate third party or a trained transcript evaluator fluent in the language of the transcript. In this case, the evaluator must have expertise in the educational practices of the country of origin and include an English translation of the review.

10. If any marketing or promotion of the program is conducted in a language other than English, the institution must retain locally someone who reports directly to the U.S.-based office and who is fluent in both English

and the local language to supervise all business and marketing transactions. This person will serve as the director or coordinator or quality control manager for the program and ensure that all functions performed are compliant with DETC standards and policies as well as internal institutional policies. The institution must maintain an accurate translation into English of all ads, flyers, brochures, commercials side-by-side with these materials in the original language and available at any time for review.

11. The institution must maintain for its non-U.S. partners a set of current operating procedures and policies that indicate not only how DETC accreditation standards will be met, but also identify how the local partner, campus, or employee will be evaluated for compliance with the policies. These policies and procedures should be enumerated in a printed operations manual that covers all areas. A copy of the manual should be given to each person directly involved with the program.

12. The institution must provide training for any non-U.S. instructors, finance, recruiting and marketing personnel to ensure that they understand and will abide by DETC standards. All non-U.S. personnel should sign written statements with the institution to indicate their understanding of and their agreement to comply with all DETC standards. All recruitment personnel must also sign the *DETC Code of Ethics for Student Recruitment Personnel.*

13. The U.S. home office for the institution must keep complete personnel files on all its non-U.S. employees or agents, including original academic transcripts for faculty.

14. Representatives from the home office should periodically visit the international campus or office and during these visits meet with students and any local employees.

15. The institution is encouraged to develop appropriate academic security practices that provide additional safeguards to prevent student cheating and fraudulent recruiting/marketing practices in their international programs. This may require additional elements for monitoring and additional requirements for proctoring examinations as well as additional training and monitoring of faculty and recruitment personnel. Even if the DETC institution has a contract with another entity, it cannot delegate responsibility for these functions to a local entity.

16. **Within six months after the start of an international program by an institution in a foreign country, the Accrediting Commission will conduct an on-site evaluation of the institution's operations in that country. An on-site evaluation will be required in every country that an institution is offering programs, i.e., providing instruction or tutorial services with or without a partner in that country. This evaluation will be conducted by a DETC-approved International Evaluator who will be assisted by a local language interpreter selected by the DETC. At least two months prior to the evaluation visit, the institution will provide descriptions and data on how each of the international policies is being followed and how the operation complies with DETC standards. At the completion of the visit, the International Evaluator will report his/her findings to the Accrediting Commission. Institutions with international programs being conducted at the time this policy becomes effective will be required to have an evaluation visit conducted in every country where a program is offered within 12 months after the effective date of this policy. For the fees charged for the on-site visit, see E.1. III. B. (actual, including business class airfare, plus 15% administrative fee).**

**In addition,** the Accrediting Commission reserves the right to conduct an on-site evaluation of international operations at any time, including as a part of a reaccreditation review. As a part of the re-accreditation review, institutions must include in their Self-Evaluation Reports a full description and comprehensive data for all international activity.

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17. The institution must have in place measures, resources, plans, and procedures that will ensure that all students will continue to receive the education and training they were promised under the contractual arrangement, even if the business arrangements between the DETC institution and the non-U.S. institution are subsequently terminated.


# # #


Revised ~~October 2011~~

Revised January 2013

# 29. Policy on Contracting for Educational Delivery
*(approved by Commission 1/10/13 – out for public comment – comments due by May 1, 2013)*

Institutions seeking to improve or expand the ways in which they provide education to their students may find the need to contract with other institutions or organizations to provide certain components of the educational experience.

The following policy applies to DETC institutions with another educational institution or other organization for the educational delivery of its programs and/or delivers training for another educational institution or other organizations under a contractual arrangement or agreement. **Institutions may only contract up to 25% of its total educational offerings.**

Any institution accredited by DETC is held responsible for all activities carried out under its name. The DETC's standards, policies, and procedures apply to any contractual arrangements as well as to the member institution's regular activities. This includes policies regarding outcomes assessment, advertising, and recruitment.

**Contracting with ~~a Third Party~~ an Institution Accredited by DETC or other Recognized Accreditor**

If a DETC institution contracts with ~~a third party~~ **another institution** to deliver an educational program, the agreement must be with an institution accredited by DETC or by another recognized accrediting agency (recognized by the U.S. Secretary of Education and/or the Council for Higher Education Accreditation). **All curricula and student services must be reviewed and approved by the DETC.**

~~Institutions may only contract up to 25% of its total educational offerings.~~

**Contracting with a ~~Third Party~~ a Training Company or Other Type of Organization**

**If the third party organization in which the DETC-accredited institution wishes to contract with is not an accredited educational institution, such as a training company, the institution must first petition the Accrediting Commission for permission to do so (see C.28. Policy of Petitions and Waivers). The institution should explain who the third party is and a brief explanation of the expected obligations of each party.**

**If the petition is granted, all** curricula and student services must be reviewed and approved by the DETC under DETC standards. Such review by DETC will not constitute the award of accreditation of the third party organization, which is a status solely reserved for the DETC accredited educational institution. Accreditation cannot be transferred to the third party organization.

**Information Required (applies to all third party contracting)**

The DETC institution contracting for educational delivery with a ~~non DETC institution~~ **third party** must seek DETC approval. The DETC institution must provide the following information to DETC staff up to 60 days prior to the implementation of the contract, along with any fees required.

1. A statement describing the percentage of the educational program to be provided by the other party, the name and background of the third party, and the reason for entering in the contract.

2. A copy of the contract between the DETC accredited institution and the other party, which clearly spells out the obligations of both parties including a description of all fees and financial obligations between the other party and the institution and the educational courses/programs and services included in the contract. The

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DETC institution is responsible for informing the non-DETC party that the contract does not imply or extend any accredited status to that entity.

3. The contract should be executed by designated officers of the institution and their counterparts within the contracting institution. The contract clearly establishes or defines:

- The nature of the services to be performed by each party;

- The period of the agreement, and the conditions under which any possible renewal, renegotiation, or termination of the contract could take place;

- Appropriate protection and contingency plans for enrolled students in the event that a contract is terminated or renegotiated or the other party fails to meet the contract obligations;

- The procedures for grievance regarding any aspect of the offerings;

- Appropriate avenue(s) for addressing perceived breaches of the contract;

- The contract explicitly defines the institution(s) awarding the credit, educational course(s), programs(s), and services included in the contract; how outcomes assessment will be conducted and reported to DETC; how student support services necessary to the courses/program(s) will be assured; and how student access to the learning resources required for the courses/program(s) will be assured; and

- The contract explicitly states financial arrangements that specify the compensation and other considerations for the services provided by each of the parties; the mechanism used to account for the services provided by each of the parties; and (if appropriate) that the institution meets all legal requirements for federal and state student aid programs that might be used by students or the contracting entities.

4. ~~The DETC accredited institution will submit the courses/programs for review by DETC per C.5. Policy on Course/Program Approval. Courses to be offered and the level of their credit must be determined by the DETC institution in accordance with established institutional procedures and C.23. Policy on Credit Hour.~~

4. Draft language for the publication of the catalog and enrollment agreement that will be issued to students enrolling in course/program(s), including the facilities, specific information about the course/program(s) and the services to be offered by the other party along with all tuition and fees. Such documents must also explicitly state the grievance policy to be used by students. The accrediting agency listed in the grievance policy shall be the accrediting body of the school providing the majority of the student instruction/support. If the third-party organization is not an accredited educational institution, the enrollment agreement, catalog and grievance policy will conform to DETC standards."

5. A copy of the state license, exemption letter or other legal documents authorizing the third party to conduct business.

6. An attestation signed by the CEO that the DETC institution will include all training delivered by the third party contractor in reports submitted to DETC such as the annual reporting of financials, enrollments, and completions/graduations.

All other applicable DETC standards, policies and procedures continue to apply to the institution, the program(s), and student services.

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**Course/Program Reviews**

**The DETC accredited institution is required to submit for review all of the courses/programs included under the contracting agreement. The institution should follow C.5. Policy on Course/Program Approval when submitting its curriculum.**

**Providing Educational Delivery Under a Contract**

If a DETC institution delivers training **or courses/programs** for another educational institution or other organization under a contractual agreement, the DETC institution ~~will~~ **is required to** include a full description of all training delivered under the contract(s) in its Annual Reports submitted to DETC. It must also include such contracted training activity in the annual reporting of enrollments and financial information to DETC.

# # #

Adopted December 2011
Revised January 2013

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# Application for Accreditation

Name of Institution:_____

Address of Institution:_____
                                 (Street Address)                              (City, State)                    (ZIP)

Telephone No.:_____ Fax No.:_____
                     (Area Code)                                              (Area Code)

E-Mail:_____ Web Site:_____ Today's Date:_____

President/CEO:_____ E-Mail:_____

Accreditation Contact Person:_____ E-Mail:_____

**Please answer the following questions:**

Year institution was established: _____;                # of years under present ownership _____;

              ___ Private, For-Profit;    ___ Private, Non-Profit;   ___ Government

Date of enrollment of first distance education student: _____

Active distance education students:  _____ Combination course resident students: _____

Number of new enrollments in last calendar year:_____

Are all of your programs offered online? __Yes;  __ No. What % online? _____ What % correspondence? ____

Do you offer CEU's? ___Yes;  ___No. If  yes, who approves the CEU's? _____

**Courses & Programs Offered:**  ___ vocational;  ___avocational:  __ degrees;  __ (degree) certificates;  __ high school

(For Initial Applicants only) Please use the appropriate form at the end of this application to list all courses and programs. Also note, no new programs may be added during the period the institution is pursuing accreditation.

**Resident Training Sites:**

Name: _____ Address: _____

List the state(s) and/or country in which the institution is licensed or approved:_____. Attach a copy of all state(s) license and/or country license(s).

List other accrediting agencies that accredit your institution, with date of original accreditation and the most recent action.

_____          _____
Agency                                                                                       Dates

_____          _____
Agency                                                                                       Dates

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Has the institution ever resigned accreditation or had accreditation denied or terminated (including DETC)?

Yes_____   No _____   Please list agency and date: _____

---

Are student recruitment personnel employed?  Yes _____   No _____   If yes, how many?_____

List states/countries in which student recruitment personnel are active:_____

Does the applicant employ student recruitment personnel or contract with any outside agents? Yes___   No ____ If, yes, explain.

---

## Certification of Application

This application is submitted by the institution's President/CEO for which accreditation or reaccreditation is being sought, and that official hereby attests to the following:

1.  The institution is a "bona fide distance education institution" as defined by the DETC Accrediting Commission as an educational institution which:

    •  formally enrolls students and maintains student records;

    •  retains a qualified faculty to service students;

    •  transmits to students organized instructional materials;

    •  provides continuous two-way communication on student work, e.g., evaluating students' examinations, projects, and/or answering queries, with prompt feedback given to students;

    •  offers courses of instruction which must be studied **predominantly at a distance** from the institution or organization; and

    •  is properly licensed, authorized, or approved by the applicable state educational institutional authority.

2.  The institution has had at least two continuous years of successful operation as a bona fide distance education institution under the current ownership and with the current programs.

3.  **The institution has a permanent physical business office at a fixed geographic location (not a P.O. Box,) for which it is appropriately licensed or authorized as required by local and state regulatory authorities.**

4.  The institution can document—via an audited or reviewed comparative financial statement that covers its two most recent fiscal years—that it is financially sound and that it can meet its financial obligations to provide instruction and service to its students. Please submit audited or reviewed financial statements as described in C.10. Policy on Financial Statements.

5.  The institution can show that the name being used by the institution is free from any association with any activity that could damage the standing of the Commission or of the accrediting process, such as illegal actions, unethical conduct, or abuse of consumers.

6.  The institution, institution's owners, governing board members, and administrators possess sound reputations and show a record of integrity and ethical conduct in their professional activities, business operations, and relations. The owners, board members and executive staff have records free from any association with any misfeasance, including, but not limited to, owning, managing or controlling any educational institutions that have entered

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# Back to Basics: Technology Tools in Assessing Outcomes

In today's educational culture amid buzzwords of "flipped classroom", "gainful employment", and "MOOCs", the basics of online and distance education can get lost in the mix. Sometimes getting back to the basics can help refocus a school's vision on their established mission, goals, and objectives. One of the basics in reviewing course/learning objectives is to re-evaluate how assessments are used to measure outcomes. Although fundamental and easily overlooked, it is important that student performance and course assessments are reviewed at regular intervals to ensure the consistent delivery of quality education.

The type of assessment(s) incorporated into an online course should match the intended learning outcomes being measured. Assessment is an ongoing review of a school's overall progress and performance which result in improvements made for students' benefit. MaxKnowledge's course, EL 106: Evaluating Student Learning in Online Courses, states that 1) "assessment is an action performed **for** students, **not** to students", 2) "assessment is completed to improve student learning", and 3) "assessments provide information relative to the objectives." There is a difference between assessment and evaluation and at times the two can be confused. Evaluation occurs when a grade is assigned to an activity, but assessment provides insight into the quality and level of learning achieved by students which can then be measured against stated objectives.

This information may not seem particularly new or original, but after years of meeting and complying with various new standards, rules, and regulations, it is easy to forget the basics and lose focus on outcomes assessment. The EL 106: Evaluating Student Learning Online Courses features a discussion of technology tools, presented with their definitions, and the specific aspect of student learning they assess. These ideas and assessment methods can then be applied to each institution's programs and individual courses. The technology tools and assessment methods mentioned throughout the course are likely already built into the online platforms used by various educational institutions, but have not been converted into a useful format designed to assess outcomes. Once the information has been gathered and analyzed as part of a custom designed outcomes assessment program, it is now in a format which can provide important feedback. Not every idea or assessment presented will be useful for every school, but they can be a starting point in reevaluating and enhancing current courses.

Course assessments are conducted with the focus on ensuring students are achieving the stated objectives and outcomes. Sometimes overly specific or overly complex assessments can prohibit student creativity and the development of new insights. Students should be challenged and allowed enough room to exceed expectations and integrate their own personal learning outcomes and goals. Sometimes getting back to basics, and using tools already available, allows institutions the opportunity to refocus assessment activities, and reevaluate their course, program, and overall institutional performance, in a way that honors students and values their contributions toward institutional improvement efforts.


~Susan Chiaramonte

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