



Accrediting Commission of Career Schools and Colleges

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ACCSC ACCREDITATION ALERT

To: ACCSC Accredited Institutions and Other Interested Parties

From: Michale S. McComis, Ed.D., Executive Director

Date: December 21, 2021

Subject: COVID-19 Guidance Issued: Student Achievement Reporting

Student Achievement Reporting ACCSC Graduation and Employment Chart Withdrawals Due to COVID-19

As the Commission has communicated to the member schools, ACCSC continues to monitor and assess the impact of COVID-19. Given the continuing fluidity of the pandemic, the Commission is working to find flexible and creative solutions that will support ongoing school operations. One area that has been of significant interest is how to best report on the Graduation and Employment Chart students who withdrew due to a COVID-19 related circumstance.

To begin to understand the impact of the pandemic on student outcomes, the Commission collected data for the Graduation and Employment Chart in the normal course for the 2021 Annual Report. In reviewing the reported graduation rate data, the Commission found that except for programs 4-6 months in length, all other program length categories did not show significantly lower rates. This is due primarily, if not exclusively, to the fact that the reporting formula using a July 2021 Report Date does not capture a significant number of 2020 cohorts of students for programs over six months in length.

In the 4-6 month program length category, which does capture some 2020 cohorts, the data show a 9.25% decrease in the percentage of programs meeting minimally the graduation rate benchmark from that of the average for the preceding four years (2017-2020). The Commission cannot ascribe COVID-19 as cause and effect or correlation to account for this decrease given the dearth of variables. However, the Commission can form an anecdotal hypothesis based on the data that it is more likely than not that factors related to the COVID-19 pandemic had an impact on some graduation rate data reported in the 2021 Annual Report contributing to the decrease.

Based on these initial findings, the Commission has adopted an initial flexible solution in an attempt to take into account the impact of COVID-19 on programmatic graduation rates. As member schools are likely aware, the Graduation and Employment Chart glossary allows for the “onset of a medical condition that prevents continued enrollment” as a reason to exclude a student from the graduation rate calculation (*Graduation and Enrollment Chart, Glossary, Unavailable for Graduation*). Given the wide-spread impact of COVID-19 on individuals, families, caregivers, employers, employees, and society generally, the Commission has determined to temporarily adjust its interpretation of this category as a means to capture a broad swath of impacted students.

In an effort to be consistent with other regulatory guidance, the Commission considered the U.S. Department of Education’s (“the Department”) Federal Student Aid (FSA) [Guidance for Interruptions of Study Related to Coronavirus \(COVID-19\) \(Updated June 16, 2020\)](#). The Department’s guidance allows for flexibility under the *Qualification for R2T4 Relief* with regard to student withdrawals due to COVID-19 issues. It is the Commission’s intent is to be consistent with the Department for this purpose.

Therefore, in any instance where a school classified a student as having withdrawn as a result of circumstances related to the COVID-19 national emergency as set forth in the Department's guidance, the school may also classify that student as "Unavailable for Graduation" on the ACCSC Graduation and Employment Chart. This will, effectively, remove the student from the graduation rate calculation.

This guidance applies to any Graduation and Employment Chart submitted with a January 2022 Report Date going forward and shall remain in effect until a governmental declaration of the end of the national emergency or the Department issues different or updated guidance that would require the Commission to alter or revise the guidance set forth herein.

Please note that this guidance applies to and may be employed by all ACCSC-accredited schools, regardless of whether the school participates in the federal student financial aid program. In any case, a school would need to meet the circumstance and documentation requirements set forth by the Department in its June 16, 2020 updated guidance.

The Commission will continue to monitor and assess data as it is provided through the ACCSC Annual Report and may issue additional guidance as may be found necessary or useful.

For additional information pertaining to this Accreditation Alert, please contact Michale S. McComis, Ed.D., directly at mccomis@accsc.org.