ACCSC

Blueprints for Success:
Preparing a Comprehensive Response for Commission Consideration

An **ACCSC Member Services** Series

INTRODUCTION

The ACCSC **Blueprints** for Success highlight best practices and provide guidance on technical areas of ACCSC-accreditation with the intention of assisting accredited member schools develop effective processes to operate in compliance with the **Standards of Accreditation**, achieve institutional success, and ensure that students are well prepared to enter the workforce.

Please note that the ACCSC **Blueprints** for Success do not supersede applicable accrediting standards, are not intended to be prescriptive about the way an accredited school operates, and do not address all compliance elements required by a school to maintain good standing with ACCSC. Rather, the ACCSC **Blueprints** for Success provides a framework that can help a school to gain a better understanding of the expectations and rigors of the accreditation process as well as sample documentation that a school might consider in order to demonstrate compliance with accrediting standards.

Preparing a Comprehensive Response

Foundational Concept: Decisions are Based on the Written Record

It is fundamental to the integrity of the ACCSC accreditation process that the Commission's deliberations and decisions are made on the basis of the written record of an accreditation review. That the consideration of compliance is based strictly on a written record grounds the process in an inherent objectivity and transparency. Accordingly, a school must supply the Commission with complete, truthful, and accurate information and documentation showing the school's compliance with all accrediting standards, if the school is to be granted and maintain accreditation.

Questions about compliance with accrediting standards may arise from the established monitoring methods, such as on-site evaluations, progress reports, stipulations, and annual report data. In addition, questions may arise from applications for substantive changes, complaint reviews, or information supplied by third parties. While the Commission employs its own fact-finding methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards through the written record.

The written record consists primarily of the school's application materials, Commission reports and letters, and the school's responses. The record may also include information submitted by third parties. It is important to remember that **the school is afforded an opportunity to review any information introduced into the written record,** and to submit documentation that provides context to any materials to be included in the Commission's consideration.

Because of the high level of reliance placed upon information, data, and statements provided to the Commission by a school, it is critical that schools respond to the Commission in a careful, considered, and comprehensive manner that provides clear evidence of compliance with accrediting standards. Compliance questions arise as a result of the Commission's ongoing monitoring and a response that demonstrates compliance with accrediting standards will answer those questions efficiently and effectively. A successful response demonstrates to the Commission that the school has conducted an assessment and knows what happened (**PAST**), has taken the requisite steps to bring the school into current compliance with standards (**PRESENT**), and has sufficient management and oversight of its processes to provide assurance of ongoing compliance (**FUTURE**).

An important resource in formulating responses to the Commission is your ACCSC representative! Each Commission letter or report includes the name of the designated ACCSC staff member for questions. That staff member is available throughout the response period to provide clarification and feedback.

Preparing for the Response

1 **THE GOAL**
When you receive that letter or report from the Commission requesting additional information, approach the opportunity to demonstrate compliance thoughtfully. The Commission's letter or report will include a standard citation. This is your goal, to demonstrate compliance with this specific standard. Familiarize yourself with that standard and be sure to ask questions of an ACCSC representative if you are in doubt about the requirements. Having a clear understanding of your destination is essential to formulating an effective plan of action.

2 **ASSESSMENT**
Much like the self-evaluation process, a successful response is based on a thorough assessment. Therefore, the next step is to assess the school's policies, procedures, and operations relative to the standard. The Commission's letter or report will outline the specific questions relative to the cited standard. Evaluating the school's operations and identifying what prevented the school from demonstrating compliance with standards leads to the plan of action that will most effectively resolve the issue. The following are examples of factors that may lead to questions of compliance:

Policies and Procedures
The school does not have policies and procedures in this area, or following the policies and procedures does not result in a demonstration of compliance.
Execution
The school is not following the policy consistently.
Documentation
The policy is being followed, but there is insufficient documentation to show compliance.
Management
Significant compliance issues may point to insufficient management or oversight in one or more areas of school operation.

If, based on your assessment, you disagree with a question of compliance, it is possible that the records previously supplied to the on-site evaluation team or Commission created the questions about compliance. In that case, it might be helpful to consult with an ACCSC representative to ensure that you completely understand the perceived problem and have assembled thorough documentation to demonstrate compliance with the cited standard. It is imperative to stay focused on demonstrating compliance with standards.

3 **PLAN OF ACTION**
Once you have ascertained the cause, it is time to formulate a plan of action for making revisions and securing the documentation necessary to demonstrate compliance with standards. The factors impacting compliance that were identified in the assessment process provide the basis for formulating an effective plan of action. And as you are developing strategies,

think about documentation. While a carefully considered strategy is a great start, being able to prove that the school has really taken the described actions is key. The following table provides possible strategies to make a demonstration of compliance in each area.

FACTOR	PLAN OF ACTION
Policies and Procedures The school does not have policies and procedures in this area, or following the policies and procedures does not result in a demonstration of compliance.	· Develop or revise policies and procedures · As applicable, incorporate into the catalog · Train staff on the new/revised policy · Implement the new policies and procedures · Implement an audit process to ensure that monitor the ongoing adherence to the policy
Execution The school is not following the policy consistently	· Re-train staff on the policy · Implement an audit process to ensure that monitor the ongoing adherence to the policy · Implement performance evaluation metrics to ensure future compliance
Documentation The policy is being followed, but there is insufficient documentation to show compliance.	· Develop/revise internal policies and procedures for documentation · Train/re-train staff regarding documentation requirements · Implement an audit process · Implement performance evaluation metrics for staff
Management Significant compliance issues may point to insufficient management or oversight in one or more areas of school operation	· Implement oversight mechanisms such as internal audits, third-party reviews · Implement metrics for evaluating institutional performance

4 THE RESPONSE

Create your written response, making your presentation a blend of narrative (**TELL**) and documentation (**SHOW**). Successful responses start with a clear description of the school's assessment, corrective plan, current compliance status, and mechanisms to ensure future compliance. The picture is completed with the inclusion of precise and comprehensive

documentation that provides evidence that the school has taken the actions depicted in the narrative and that the school **currently complies with accrediting standards**.

If responding to an on-site evaluation report ("OER"), the report includes a list of items the school may consider supplying in response to the Commission. A blend of narrative explanations and documentation, these items are meant to provide a guide to the types of information the school must supply to demonstrate compliance. If responding to a school action letter, the letter includes a list of items that the school MUST provide. These are the items the Commission has determined are necessary to complete the school's record of compliance. Be sure to address each requested item.

INTRODUCTION/SUMMARY

Set the stage with an introductory statement. Remember this is your first opportunity to communicate directly with the board members responsible for making decisions about compliance with accrediting standards and ultimately about the school's accredited factors. Provide an overview of the pertinent elements of the school's response and any context about institutional performance that will provide a clearer understanding of the response. An effective narrative will help to take any guess work out of the Commission's assessment and provide an effective roadmap outlining the school's compliance initiatives.

RESPOND TO EACH FINDING AND INFORMATION REQUEST

For each finding, provide a narrative regarding the factors that contributed to the school's inability to demonstrate compliance with standards and describe the plan of action developed to return the school to compliance with standards. Your work in steps 1 and 2 to identify the factors impacting the school's ability to demonstrate compliance with standards will provide the information needed for this narrative. Although the priority is to demonstrate current compliance with standards, identifying the factors impacting the school's ability to demonstrate compliance provides assurance to the Commission that the measures taken to address those factors will contribute to ongoing compliance. Part of an effective response is to provide assurance to the Commission that the management and administrative capacity of the school is sufficient to support continuous compliance with accrediting standards.

"How and Why?" The Commission may ask the school to demonstrate how or why, for example, the school's management team is sufficient and adequate, or how your library holdings are adequate to serve the student population. In these cases, the Commission is giving the school the opportunity to explain its position and support that position with documentation.

DOCUMENTATION

Providing selected samples of documentation shows that the narrative is not a work of fiction, but a documentary that portrays the reality of operation at the institution. Where the narrative describes an action, include documentation that the action has taken place. For example, if the school has revised policies and procedures, provide an excerpt of the school's policies and procedures manual with the new policy. Also include documentation to show

that the policy has been implemented, such as samples of student records, minutes of meetings, and copies of performance evaluations.

Ways to Document the Implementation of Your Plan of Action:

	PLAN OF ACTION	DOCUMENTATION
Policies and Procedures The school does not have policies and procedures in this area, or following the policies and procedures does not result in a demonstration of compliance.	· Develop or revise policies and procedures · If required, disclose in the catalog · Train staff on the new/revised policy · Implement the new policies and procedures · Implement an audit process to ensure that deviations from policy are documented/ identified	· Updated policies and procedures document · Revised catalog · Memo showing distribution of new policy/ effective date · Results of the audit process · Documentation that the policy has resulted in current compliance
Execution The school is not following the policy consistently	· Re-train staff on the policy · Implement an audit process to ensure that deviations from policy are documented/identified · Implement performance evaluation metrics to ensure future compliance	· Evidence of training sessions: participants and content · Documentation of current compliance of operations · Results of audits · Results of performance evaluations
Documentation The policy is being followed, but there is insufficient documentation to show compliance	· Develop/revise internal policies and procedures for documentation · Train/re-train staff regarding documentation requirements · Implement an audit process · Implement performance evaluation metrics for staff	· Copies of new/revised policies and procedures · Evidence of training sessions: participants and content · Documentation of current compliance · Results of performance evaluations · Results of audits
Management Significant compliance issues may point to insufficient management or oversight in one or more areas of school operation	· Implement oversight mechanisms such as internal audits, third-party reviews	· Results of audits, third-party reviews · Evidence of action taken based on the results

	· Implement metrics for evaluating institutional performance	· Evidence of performance reviews and action taken based on those reviews · Documentation of current compliance

Carefully consider the documentation to include in your response. It is important to illustrate your point while avoiding an avalanche of superfluous documents. Identify the documentation necessary to show consistent execution of policies and demonstrate systematic compliance over time. In making your selections, consider these guiding questions:

- *Does the documentation support the school's narrative response?*

- *Is the documentation clear?*

- *Is the documentation complete (no blank forms)?*

- *Does the documentation demonstrate that a corrective action has taken place?*

- *Does the documentation show the systematic implementation of a new process or policy on a go-forward and ongoing basis?*

Guidelines for Ensuring your Response is Comprehensive

Management Capacity:

Demonstrating appropriate management and administrative capacity involves describing the management team and its experience/education **AND** also the scale of operations of the school. The determination of adequate management can only be made in context of the magnitude of the managerial and administrative load. The need for managers and administrators varies based on student population, number and diversity of programs offered, and the level of the credential offered. The bottom line to a determination of the adequacy of management and administrative capacity is the compliance status of the school. If a management team that seems to be adequate in number and possesses appropriate prior experience is unable to rectify compliance issues, the question regarding adequate management has not been resolved.

Avoid simply providing a list of new managers without explaining the rationale for hiring these individuals. The narrative response should include an analysis regarding how the school determined the necessity of adding new staff or making changes to the administrative structure. In addition, the school should explain how the revised management structure is appropriate to support the school's mission, program objectives, and students served.

Refunds:

Demonstrating that refunds are made in a timely manner requires explaining the school's policies and procedures for processing refunds **AND** also policies for monitoring student attendance. Evaluating the accuracy and timeliness of refunds depends on knowing the student's start date, last date of attendance, and date the student withdrew. For example, if the school's refund policy is to make a refund within 45 days of the date the school determined that the student withdrew, the date is easily documented for students who provide notification of withdrawal. However, the school must explain how the date of withdrawal is determined for students who leave without official notification to the school. Commonly, this is identified as a number of days of consecutive absence which then results in termination from the school.

After describing the school's policies – both refund and attendance – show how the school adheres to the policy by providing documentation from files of students who withdrew and received a refund to show that refunds are currently processed in a timely manner in accordance with the school's policies.

- ✓ Provide a list of students in a table that includes a student ID number, start date, last date of attendance, date of determination of withdrawal, the refund due date and the date the refund was paid.

- ✓ For each student listed, provide a refund calculation worksheet and supporting documentation (e.g., EFT, or completed checks) to demonstrate that all students identified on the roster as being due a refund were made in accordance with the school's published refund policy; and

- ✓ Explain the circumstances for any student included on the roster during this time period whose refund was not processed in accordance with the school's refund policy and discuss the strategies developed to avoid this compliance shortfall going forward.

Student Recruitment:

Demonstrating that all school personnel whose primary responsibilities are to engage in recruiting and admissions functions have signed an acceptable code of conduct. Demonstrating compliance with this standard involves first identifying each staff member who is engaged in recruiting and admissions functions. If the school's response simply provides a few signed Codes of Conduct, there is no way to determine whether that represents a Code of Conduct for all of the required school personnel. When providing documentation for school personnel, be sure to include a roster, or perhaps an organizational chart, which identifies the pertinent employees. The response should include a copy of a signed code of conduct for all school personnel whose primary responsibilities are to engage in recruiting and admissions functions. If the school provides only a blank copy of the Code of Conduct, it does not demonstrate that the school is actually using the form.

Faculty Training

Demonstrating that the school engages in ongoing faculty assessment and professional development activities involves describing the school's policies for assessing faculty AND for providing professional development. The school's description must take into consideration that professional development activities encompass:

- continuing education in the subjects taught

- teaching skill development

- instructional methodology development

- membership in trade and professional organizations

- other activities appropriate to the ongoing development of faculty

The next step of the response is to provide documentation that the school's faculty engages in professional development activities. This is not a situation where a sample of documentation will be effective in showing compliance. In this case, a roster of faculty, evidence of assessment, and documentation to demonstrate that *each member* of the school's faculty engages in the activities described in the school's narrative are necessary to show current compliance.

Admissions

Demonstrating that the school is following its stated admissions policy involves describing the school's admissions criteria AND the school's procedures for documenting the student met the criteria prior to enrollment. If the school indicates that there is a new Admissions File Checklist to make sure that all documents are collected, and provides a blank copy of the new checklist, it does not provide documentation of current compliance with standards. To show that the school adheres to its policies and procedures, the school should select a sample of applicants during a designated time frame and provide documentation that the school collected admissions documentation. An effective response would include the following:

✓ A list of the school's admissions criteria and a description of the documents collected to demonstrate the applicant meets those criteria

✓ A roster of all applicants who formally applied for admission to the school during a designated period of time;

✓ For each applicant admitted to the school, provide copies of all documents collected to demonstrate the applicant met all admissions criteria;

✓ For each applicant admitted to the school, provide a copy of the executed enrollment agreement signed by all parties to show that the documentation was collected prior to enrollment;

✓ For any applicant denied admission to the school, documentation of the admissions criteria the applicant failed to meet; and

✓ An explanation of the circumstances for any applicant on the roster for whom the school did not collect all documentation required for admission and discuss any strategies developed to avoid this compliance gap in future.

Institutional Assessment and Improvement

There are two aspects to this standard requirement that must be addressed in order to demonstrate compliance: institutional assessment and improvement activities. The areas that must be included in this process are management; fiscal condition and budget; administrative policies and practices; emergency preparedness; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes. A strategic plan may be helpful to the school's leadership for identifying improvement goals and tracking progress on various projects; however, simply providing the Commission with a plan does not show the school has actually done anything in the way of institutional improvement. Therefore, the narrative should describe the school's process for institutional assessment and a description of the improvement activities that the school has completed as a result. The documentation should include the results of institutional assessment, evidence of the decision-making process to identify the improvement activities the school will undertake, and documentation to show that the improvement activities have actually been implemented.

Student Services/Satisfaction

The *Standards of Accreditation* require that the school is attentive to its students' educational and other needs. Questions about the school's compliance with the standard may arise from negative feedback from students via the results of surveys conducted during an on-site evaluation or noted in a pattern of complaints to ACCSC. In responding to this type of finding, it is important to focus on two areas: how the school remains attentive to student needs on an ongoing basis AND the resolution of the current issue of dissatisfaction.

Describe how the school normally collects student feedback, such as suggestion boxes, surveys, and student groups AND how the school uses the information gleaned via these methods to identify and address student needs. If after the on-site evaluation, the school has determined to make changes to those processes, describe those changes and provide documentation of what has been implemented.

To show resolution of the current issue of dissatisfaction, it is critical to conduct an assessment of student survey results. Remember that the results of student surveys reflect either reality or the students' perception of reality. For example, students may perceive (and report on surveys) that equipment is insufficient for training purposes. The school conducts an assessment, using both internal and external sources to review equipment. The results of the assessment will drive the resultant plan of action, as follows:

• If the evaluation shows that equipment is inadequate, the plan of action would be to improve the equipment.

- If the evaluation shows that equipment is adequate, further research is needed to determine why the students' expectations are out of alignment with what is needed for the workplace. In this case, a plan of action might be to revise the expectations created by advertising, the recruiting process, social media, and faculty.

After describing the results of the assessment, explain the plan of action for addressing student concerns, and providing documentation of the steps taken to improve the school's attention to student needs. Another important facet of the response is to show that the school's strategies have been effective in bringing about change and an excellent way to do that is to re-survey students after the changes have been put in place. When re-surveying students, use the ACCSC Student Survey instrument, or one that is substantially similar. A course survey does not work well, as it is focused on student feedback about curriculum and faculty and may miss data points that are important to the issues raised in the finding. Include in your response:

- A copy of the survey instrument used;

- A description of the student survey process;

- A summary of the results of the school's student surveys presented in a comparative format with the student survey results from the on-site evaluation; and

- A detailed analysis of the new student survey results;

In conclusion, explain whether the re-survey shows an upward trend in student satisfaction that is an indicator the school has improved its attentiveness to student needs and describe the school's future plans to address any remaining areas of student dissatisfaction.

Student Achievement Outcomes

The *Standards of Accreditation* require that the school demonstrates successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education as well as acceptable pass rates on licensure/certification exams where required by governmental entities to work in a particular career field. The Graduation and Employment Chart is the Commission's mechanism for collecting student achievement data, which is reported separately for each program and length of program. The Commission determines the established benchmark rates for acceptable student achievement from information collected from member schools. Reported rates of student graduation and graduate employment are a vital indicator of the school's effectiveness in delivering training and supporting learning in a way that leads to achievement of the objectives of the programs. Therefore, it is of utmost importance to provide the Commission with a carefully considered and comprehensive response when reported rates of student achievement fall below the benchmark.

The first step is to find out what is causing the below benchmark rates. Because improving student achievement rates can take longer to show an effect, it is critical to start with a solid understanding of the issues. That will ensure the plan of action will be targeted most effectively.

- Garner internal and external input regarding student graduation rates in the following ways:
  - ✓ Survey students who have withdrawn to determine the reasons for withdrawal;
  - ✓ Seek input from faculty about how well-prepared students are to engage in the education and observed reasons for withdrawal;
  - ✓ Conduct a study of admissions requirements to determine if criteria are appropriately creating a student body capable of benefiting from the training; and
  - ✓ Evaluate the sequencing of the curriculum, to determine whether the way in which the program is structured creates a barrier for the new learner;

- To analyze graduate employment rates, gather external and internal feedback in the following ways:
  - ✓ Survey employers about whether new graduates are adequately prepared;
  - ✓ Conduct a market study to determine whether there is still a viable market for the school's graduates, with sufficient opportunities to accommodate the number of graduates the school produces;
  - ✓ Conduct a program evaluation to determine whether the curriculum is still aligned with the vocational outcomes for which training is provided;
  - ✓ Assess the adequacy of program equipment and supporting resource materials;
  - ✓ Seek input from the Program Advisory Committee regarding the market trends, alignment of curriculum to the current market needs, and adequacy of program equipment and resources; and
  - ✓ Review lines 16, 17, and 18 on the Graduation and Employment Chart, that provides results for graduates that were not classified as employed in field, in three categories: unknown, unemployed, or employed in an unrelated occupation.

Once you have the results of your assessment of student achievement, the school can formula a strategy that is targeted to address the factors in a way that leads to effective improvement. For example, if by surveying former students you find out that there is too much "book work" and not enough hands-on in the first quarter, a revision of curriculum will probably be more effective than changing a grading policy. If by reviewing the Graduation and Employment Chart, the school realizes that most graduates not classified as "employed in field" are reported as "unknown," a more intensive follow-up program might be more effective than revising the curriculum. Here are additional examples of how assessment leads into an effective plan of action:

Assessment: low graduation rates are the result of a lack of study skills in new students. The school might decide to address this by introducing an extended orientation process designed to equip new students with the tools they will need to be successful.

Assessment: low employment rates are due to a shrinking market need for entry-level employees. The school might decide to address this by limiting enrollment in the program to ensure that graduates have adequate opportunities for employment.

The next step of the process is to show that the school is actually implementing the described strategies for improvement.

Documentation of the extended orientation process: A copy of the curriculum for the orientation, a schedule for how the curriculum is delivered, and evidence that students are engaged in the new orientation, through attendance records.

Documentation of the enrollment limitation: Minutes of a meeting showing how the school determined the appropriate enrollment levels, the revised admissions policies and procedures to implement the enrollment limitations, and attendance records to show that the school is adhering to those limitations.

To the extent possible, it is important to show that the strategies have been effective in improving rates of student achievement. Providing new data via a Graduation and Employment Chart prepared using a current report date is often a required component of the school's response; however, it may be that change is not yet discernable in historical data. In that case, it is critical to supplement the data with more contemporaneous data, in the form of retention charts and recent employment information.

Although the steps to addressing student achievement questions may seem like a lot of work, careful assessment, smart planning, robust implementation, and comprehensive data will build a solid basis for a determination that the school is dedicated to the students' successful achievement of the programs' objectives.

Other Factors

It may be that your analysis of student achievement reveals that the rates are impacted by extenuating circumstances beyond the school's control. The Commission has taken such factors into consideration as part of the *Standards*, which state that for any program with below-benchmark rates of student achievement, the school may show that other factors are impacting the school's ability to meet the Commission's requirements, such as:

Economic conditions

State and national trends

Location

Student population served

Length of program

Students who withdraw from training but still obtain employment

State requirements

Other external or mitigating factors reasonably related to student achievement, such as natural disasters

In these circumstances, it is critical that the school shows – with documentation – the impact of these external factors on the rates of student achievement. If 1 student out of 100 is unable to find employment due to local economic conditions, that is less likely to be a major factor in a below-benchmark employment rate than if 85 out of 100 are unable to find employment for the same reason. When making a case that external factors are adversely impacting the school's ability to meet the Commission's established benchmark rates, the school must show that it is making every effort to mitigate the effects of external circumstances.

BEST PRACTICES

✓ Plan ahead in preparing the school's response.

✓ Include an introductory and narrative summary of the school's response.

✓ Give a serious, thorough description of the school's compliance efforts.

✓ Reference applicable accreditation standards in the school's narrative response.

✓ Explain how the documentation demonstrates the school's compliance with accrediting standards.

✓ Take copious notes during the Evaluation Review Summary at the conclusion of the on-site evaluation.

✓ Contact your designated ACCSC staff liaison when needed.

Sometimes, as part of the response, the school decides to make a reportable change, such as discontinuing a program. The response should not be used as the sole method to inform ACCSC of changes. It is important to submit the appropriate application or notification to ACCSC in accordance with the applicable filing requirements, and to provide evidence of that submission with the school's response.

BEST TO AVOID!

✓ Don't overwhelm the Commission by including miscellaneous documents that do not address the compliance finding or support the school's position.

✓ If you disagree with a compliance finding, do not provide a cavalier response.

✓ Don't just provide exhibits with no narrative to explain what the exhibits are intended to demonstrate.

✓ Don't simply provide copies of newly created blank forms. Blank forms do not show implementation of the form.

✓ Don't simply respond with a "will do" response that promises future action; answer with a "have done" response that demonstrates compliance.

✓ Don't create a grand plan that is not supported by the school's infrastructure and does not realistically reflect day to day practices at the institution.

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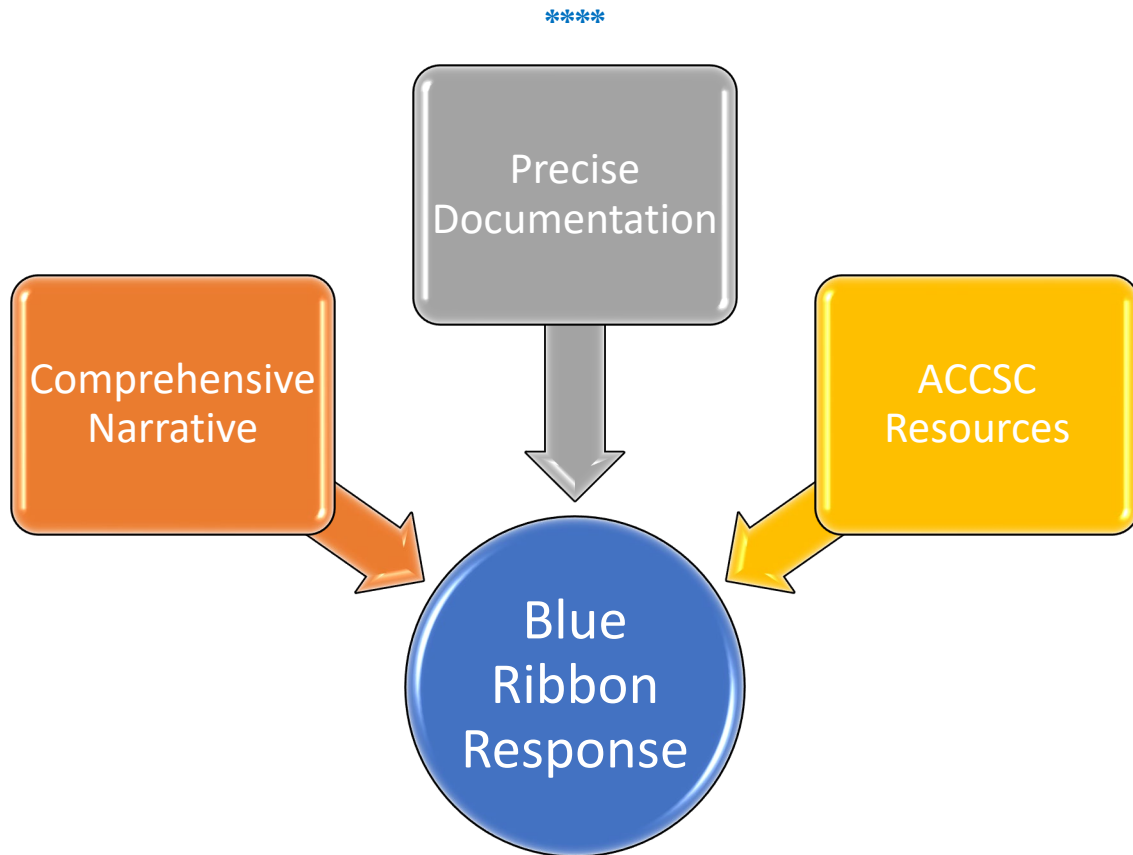
Successful responses are able to build a relationship of trust with the Commission, creating confidence that the school is able to develop and implement policies and procedures, ensure fair and consistent execution in daily operations, has effective mechanisms to monitor performance and make course corrections as needed, all of which results in a likelihood of future compliance.