

Testimony of Dr. Michale S. McComis, Executive Director,  
Accrediting Commission of Career Schools and Colleges  
Before the  
Senate Committee on Health, Education, Labor, and Pensions  
On "For-Profit Schools: The Student Recruitment Experience"  
August 4, 2010

Thank you for the opportunity to testify. My name is Michale McComis and I am the Executive Director of the Accrediting Commission of Career Schools and Colleges (ACCSC). I am honored to appear before the Committee this morning to discuss the important issue of student recruitment by higher education institutions. I hope to provide the Committee information about ACCSC's accreditation standards and process in this area, but also to provide our perspective on the role of accreditation in higher education more generally. Let me state unequivocally at the outset that any form of student recruiting or advertising practice that unduly induces students to enroll in an institution is anathema to the mission of the organization that I represent. As I outline in more detail below, ACCSC works diligently to enforce its standards in the areas being addressed by this hearing and is committed to eradicating inappropriate recruiting practices in its accredited institutions. In addition, ACCSC looks forward to exploring with this Committee and Congress how oversight of the student recruitment experience might be strengthened through the accreditation process.

By way of introduction, ACCSC is a private, non-profit independent accrediting agency recognized by the Secretary of Education continually since 1967. ACCSC is national in scope and currently accredits 789 institutions with over 250,000 students throughout the country. These institutions are predominantly private sector, career-oriented institutions, offering programs at the non-degree, Associates Degree, Bachelors Degree, and Masters Degree levels. Institutions

accredited by ACCSC prepare students for trade and technical careers in many areas including allied health, nursing, information technology, automotive technology, commercial art, and unique areas such as horology, luthiery, and yacht building and restoration.

ACCSC's primary mission is to serve as a reliable authority on educational quality and to promote enhanced opportunities for students. To meet its mission, the Commission has a values-based framework for accrediting focused on integrity, accountability, continuous improvement, open communication, and teamwork. My tenure with ACCSC began in 1994, becoming its Executive Director in 2008. I have recently served on two of the Department of Education's negotiated rulemaking panels – the 2009 Accreditation Panel and the 2010 Program Integrity Panel. I also recently testified before the House Committee on Education and Labor at a hearing regarding program length and credit hour definitions.

*Summary of Testimony:*

My testimony is divided into two primary parts. First, I will place the issue of recruitment in the broader context of our higher education system and regulatory structure. It is important to provide a bit of background regarding the need for continued reliance on the regulatory “triad” that provides the student funding and quality-assurance mechanisms for our institutions of higher education and to discuss ways in which that structure might be strengthened.

The second part of my testimony will provide the Committee with a summary of ACCSC's standards on student recruiting and advertising and its process for reviewing institutions generally, and with regard to recruitment and advertising in particular. Developed based on four decades of experience in the accreditation of career-oriented institutions, ACCSC believes that its standards on recruiting and advertising are amongst the most rigorous in the

higher education community and can serve as a model for accreditors' assessment. I also would like to discuss with the Committee how ACCSC's standards on recruitment and advertising directly relate to our assessments of student achievement at our institutions.

*The Broader Context of Higher Education Policy, Accreditation, and the Evaluation of Recruitment and Advertising Practices:*

As higher education continues to take a more diverse shape, ensuring the quality and integrity of higher education institutions and their programs continues to be a paramount concern, and historically, the primary responsibility of accrediting agencies and the schools they accredit. Unlike federal and state governments, accrediting agencies are private, independent entities, focused on establishing standards and assessing their member institutions in relation to those standards on a peer-review basis. As such, they are the best resource for making determinations related to educational quality.

Despite the independent, private nature of accreditation, accrediting agencies have been linked to the federal student financial aid program since the Congress established the Higher Education Act 45 years ago. Institutions eligible for Title IV funds must be accredited by an accrediting agency recognized by the U.S. Secretary of Education and the Higher Education Act creates a structure for this recognition process. Included in the Act and regulations are criteria which all accrediting agencies must include in their accreditation standards. In this manner, accreditation has played an essential role in institutional and programmatic quality assurance, an essential component of the regulatory "triad" with federal and state governments in overseeing higher education.

The federal regulation of criteria for accreditation standards set forth the expectation that accrediting agencies have standards regarding recruitment, admissions practices, and advertising

(section 602.16(a)(1)(vii)). It is, therefore, paramount that all agencies adopt and enforce such standards – regardless of the types of institutions the agency accredits. All regulatory and oversight agencies in the triad must work together to stem abuses in these areas. For example, if an institution is found by the federal government to have violated federal regulations regarding recruitment practices, then there should be an expectation that a state would also conduct a review to determine if state law or regulation was violated and accreditors should investigate to determine as to whether the agencies standards were violated. This is a primary purpose of the triad and one that the Congress should expect to occur. To that end, I am hopeful that the GAO will supply my organization with information from its recent report on recruiting activities regarding any institution accredited by ACCSC so that we can conduct our own investigation into these matters.

The role of accreditation, in particular, is an increasingly important one. Given the growing diversity of higher education institutions and the growing demographic of career-focused, adult learners, coupled with the growth of education access and opportunity, accreditors must hold institutions accountable to ensure that only the highest level of integrity is injected into the student recruitment and admissions process. Moreover, all higher education institutions and their accreditors must understand the connection between recruitment and admissions processes and student achievement outcomes.

As I demonstrate in the next section of my testimony, ACCSC has established rigorous standards in the areas of recruiting, advertising, and admissions, intended to help ensure that institutions recruit and admit only those students who are accurately and fully informed about the

institution's program and who are qualified and capable of completing the program in which they intend to enroll.

*ACCSC's Standards and Processes Regarding Recruitment, Advertising, and Admissions*

The ACCSC *Standards of Accreditation* and accreditation process emphasize educational quality by focusing on outcomes. Essentially, the Commission evaluates an institution's educational objectives and assesses the institution's success in meeting those objectives. This assessment process includes a review of an institution's compliance with input standards and the institution's ability to demonstrate acceptable output results in terms of student achievement outcomes, specifically student learning assessment and rates of graduation and employment.

*ACCSC's Standards:*

In addition to having standards and processes to examine institutional inputs, ACCSC has outcomes-based standards, including graduation and employment rates, which the agency uses in its assessment process. Specifically, the Commission is concerned about institutional operations and how those operations contribute to student achievement outcomes and the application in the workplace of skills, knowledge, and competencies.

ACCSC's standards on recruitment, advertising, and admissions are necessarily linked to its standards on student achievement; none of the standards are viewed in isolation from another. ACCSC strives for a "whole school" assessment process whereby the appropriateness of an institution's operational and education inputs can be evaluated in the context of student achievement outcomes. Each component of the school (e.g., recruiting, advertising, admissions requirement, program design and curriculum, student services, the quality of the administration and faculty, the inclusion of the employment community in curriculum development and

assessment, etc.) has an impact on the overall success of an institution and the success of students. ACCSC has more than 50 standards that address the areas of recruitment, advertising, and admissions directly (see Appendix I) and several more that do so tangentially.

ACCSC's primary standards require institutions to operate in an ethical manner with regard to recruitment practices and to demonstrate that:

- The institution describes itself to prospective students fully and accurately;
- The institution follow practices that permit prospective students to make informed and considered enrollment decisions without pressure;
- The institution's recruitment efforts attract students who are qualified and likely to complete and benefit from the training provided by the school, instead of simply obtaining enrollments;
- The institution observes ethical practices and procedures in the recruitment of its students in areas including the following:
  - Only using school employees for recruitment;
  - No making of false or misleading statements;
  - No recruiting at or near welfare office, unemployment centers, or homeless shelters;
  - No promises (explicit or implicit) of employment;
  - No inducements to enroll
  - No recruiters involved in admissions decision;
  - Allowance for a "cooling off" period and implementation of cancellation policies; and,
  - No discrediting others schools or influencing prospective students to leave another school.

- The institution provides prospective students with a copy of the catalog prior to enrollment for the purpose of full disclosure; and
- The institution provides prospective students with a copy of the enrollment agreement (i.e., contract) prior to and after signing, which sets forth clearly the obligations of the school and the student.

ACCSC's primary standards in the area of advertising require institutions to demonstrate that:

- All advertising and promotional materials are truthful and accurate and avoid leaving any false, misleading, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, and its accredited status;
- Advertising and promotional materials clearly indicate that education, and not employment, is being offered and that no overt or implied claim or guarantee of individual employment is made at any time;
- Employment or Help Wanted classifieds are not used for any form of student recruitment;
- Endorsements used in school catalogs, literature or advertising are used only with the written consent of the authors and are kept on file and subject to inspection and that under no circumstances may currently enrolled students provide endorsements on behalf of the school;
- Advertisements and literature do not quote salaries for an occupation unless they also accurately indicate the normal range or starting salaries in the occupation for which training is provided and include the source of this information;
- Scholarships are not used as a recruiting device; and

- Advertising of accredited status also indicates by what agency or organization the institution is accredited and advertising of financial aid includes an eligibility phrase (e.g., financial aid available for those who qualify).

*ACCSC's Process:*

Equally important to ACCSC's standards are the processes used by the Commission to evaluate an institution's compliance with those standards. ACCSC, therefore, has a multistep process by which the Commission evaluates an institution's compliance with accrediting standards. To prepare for the re-accreditation process, institutions are required to prepare a Self-Evaluation Report (SER),<sup>1</sup> which requires institutions to demonstrate how their programs meet ACCSC's standards. For example, institutions must explain how the institution has determined that its recruitment practices are ethical and appropriate, show that advertising in use is appropriate and not misleading, and demonstrate the appropriateness and implementation of admissions criteria.

ACCSC staff and peer-review evaluators then visit an institution and make determinations regarding an institution's compliance with standards based on the information presented in the SER and assessments made during the on-site evaluation. If there is an area of non-compliance cited by an on-site evaluation team, an institution has the opportunity to demonstrate compliance to the Commission. If an institution fails to make such a showing, ACCSC will take action measured appropriate to the level of the offense.

ACCSC has ample evidence to show that the Commission holds its institutions accountable to its standards to include, among many others, those related to recruitment, advertising, and

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<sup>1</sup> Institutions seeking initial accreditation are also required to complete a detailed SER, which would include a demonstration of compliance with our advertising and recruitment standards.



admissions practices. Over the prior two years, ACCSC conducted 629 on-site evaluations for a variety of purposes (i.e., initial and renewal of accreditation, substantive changes reviews, and directed investigations on an announced and unannounced basis). During those 629 on-site evaluations, approximately 8% of our findings pertained to the areas of recruitment, advertising, or admissions practices. Within those findings, 70% were in the area of advertising, 25% were in the areas of admissions practices, and 4% were in the area of recruitment practices. Examples of these findings range broadly from less severe non-compliance such as stating correctly that the school is accredited without also stating that ACCSC is the accrediting agency to more serious noncompliance. Examples of more serious noncompliance include, in the area of advertising the use of a subjective statement or other information that an institution might not be able to fully support (e.g., “state-of-the-art”), in the area of admissions not collecting sufficient documentation to demonstrate that admissions criteria were fully met prior to matriculation for all students, and in the area of recruitment not sufficiently removing recruitment personnel from the admissions decision process. While the statistics show that findings related to recruitment, advertising, and admissions practices are not indicative of substantial noncompliance by our institutions, ACCSC does take each and every instance of noncompliance seriously and the Commission is diligent in requiring institutions to take corrective action necessary to demonstrate that they achieve compliance.

Another indicator that the issues addressed herein are not widespread among ACCSC-accredited institutions is the results of student surveys that the Commission conducts during the on-site evaluation. An analysis of student survey results from 69 on-site evaluations conducted in April 2010 through May 2010 shows the following:

Student Survey Results:

Survey Question	Total Respondents	Number Yes	Number No	Percentage Yes	Percentage No
Were all entrance requirements explained to you before you enrolled?	6091	5817	274	95.5%	4.5%
Were all costs that you are required to pay to attend this school explained to you?	6070	5668	402	93.4%	6.6%
Did you receive a copy of the school catalog before you enrolled?	6073	5539	534	91.2%	8.8%
Did you receive a signed copy of the enrollment agreement?	6067	5962	105	98.3%	1.7%
Did a school representative accurately provide you with all necessary facts and details about the school?	6057	5456	601	90.1%	9.9%
Did the school explain your loan payment responsibilities?	5893	5518	375	93.6%	6.4%
Are you clear about the size of your loan and what your repayment plan will be?	5890	5060	830	85.9%	14.1%
Did the financial aid representative appear knowledgeable and helpful?	5927	5289	638	89.2%	10.8%
Do you feel good about your decision to attend this school?	5920	5413	507	91.4%	8.6%

While the results of the surveys do not show 100% student satisfaction, they certainly show a very high rate of student satisfaction in areas related to the admissions and financial aid processes of their institutions – a rate high enough to support a conclusion that the problems that do exist are not widespread amongst our accredited institutions.

With regard to enforcement, ACCSC has a number of programmatic and institutional actions at its disposal to ensure compliance with its standards and rules. As stated previously, when non-compliance with a standard is found, the institution has an opportunity to demonstrate corrective action and that the institution has achieved compliance. If the Commission determines that an institutions has not fully or sufficiently made such a showing, the Commission can defer final action, direct a school to show cause why accreditation should not be revoked, place an institution on probation, direct a school to cease enrollment in a program, or take an adverse action such as accreditation revocation. Which action the Commission takes will often depend on

the severity of noncompliance or the amount of time that has transpired where the school over time has failed to demonstrate compliance. In at least one instance, ACCSC denied a school's application for initial accreditation solely on grounds that the institution did not meet the Commission's advertising standards. To reiterate an important point regarding accountability, all accreditors should have rigorous standards in the areas of recruitment and advertising practices and enforce those standards, regardless of the types of institutions accredited, insofar as all students must be protected from inappropriate recruiting practices or misleading advertising.

Between accreditation cycles, ACCSC relies on both its interim monitoring process and its robust complaint process to monitor potential violations of recruitment, advertising, and admissions standards. With regard to interim monitoring, the Commission can direct an institution to submit reports to demonstrate on-going compliance over time. This function is used when a school has demonstrated corrective action, but the Commission wishes to monitor the institution's implementation of that corrective action and compliance with applicable accrediting standards over time. ACCSC also requires its institutions to submit a report annually of all programmatic graduation rates and employment rates and will place an institution into a monitoring phase should any reported rate of graduation or employment fall below the Commission's benchmarks.

With regard to ACCSC's complaint process, if a student believes that he/she has, for example, been misled in the recruitment or admissions process, that student can forward a complaint to the Commission for investigation. Pursuant to federal regulations and in keeping with best practices, ACCSC reviews every complaint received and investigates those that raise a reasonable doubt as to an institution's compliance with accrediting standards. The Commission

believes that this is a crucial component of its interim monitoring and therefore requires every institution to publish in its catalog the ACCSC Student Complaint/Grievance Procedure that provides students with detailed information regarding how to file a complaint with the Commission.

In the prior two years, ACCSC has received 411 complaints from students, parents, school employees, other accredited institutions, and members of the public.<sup>2</sup> Of those 411 complaints, 50 – 12% – included at least one allegation regarding recruitment, advertising, or admissions practices. Generally, these complaints allege issues such as the use of misleading advertisements or that school personnel made statements that the complainant believed to be inaccurate. Again, this statistic indicates that while problems associated with recruitment, advertising, and admissions practices exist and are troubling, the instances do not appear to be widespread among our schools. This notwithstanding, ACCSC takes all complaints seriously and in instances where a complaint investigation has uncovered an area of noncompliance, the Commission has required the institutions to demonstrate corrective action necessary to achieve compliance. ACCSC has had instances where an investigation predicated on a complaint ultimately led to a Show Cause Order, Probation Order, or the revocation of an institution’s accreditation (although, not always for the same reasons set forth in the original complaint).

*Connection to Student Achievement:*

ACCSC believes that the evaluation of recruitment, advertising, and admissions practices is linked to our evaluation of student learning and outcomes at institutions. ACCSC therefore tightly aligns its student achievement standards to institutional operations and input standards.

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<sup>2</sup> Total enrollment in ACCSC-accredited institutions was 257,954 as of June 30, 2009.

ACCSC views its graduation rate and employment rate benchmarks as tools to identify issues, such as inappropriate recruitment, advertising, or admissions practices, and to develop institutional improvement objectives as a means to enhance institutional and student success. In the area of student learning and achievement outcomes, ACCSC requires that:

- Student learning outcomes for each program are consistent with the program objectives and meet any relevant academic, occupational, or regulatory requirements;
- Student learning outcomes for each program are aligned with the program's objectives, the occupational area of study, and with the level of education intended (e.g., non-degree, degree, degree level);
- Student learning outcomes for each program reflect the necessary occupational and academic knowledge, skills, and competencies as applicable;
- The school has a developed and structured process to assess and evaluate the defined student learning outcomes;
- The school must demonstrate successful student achievement by documenting through its assessment practices that students are acquiring the knowledge, skills, and competencies intended by the program objectives; and
- The school must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education.<sup>3</sup>

If students are lured to an institution and induced or encouraged to enroll when those students may not be a good fit in relation to program objectives, then that institution will likely have difficulty demonstrating competency achievement by its students and acceptable rates of graduation and employment. These are the types of assessment that are key and I have seen, anecdotally, where an institution's graduation rates decreased in direct correlation to more aggressive marketing schemes. In such instances, ACCSC has required an institution

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<sup>3</sup> Appendix II includes further detail of ACCSC's student learning and achievement outcomes standards.

to make a showing of corrective action in a manner that positively affected student achievement outcomes.

Overall, I am proud of the Commission's diligence in enforcing its recruitment, advertising, and admissions standards and while I believe that the unacceptable and abhorrent activities presented for this hearing are not in evidence for an entire sector of the higher education community, I am aware that more vigilance among all accrediting agencies, with regard to all institutions is necessary. To that end, ACCSC will continue to assess its standards in these areas and look for opportunities to strengthen its accreditation practices. It is also important that the oversight of all accreditors through the NACIQI process creates a level playing field and holds all accreditors accountable to establish and enforce rigorous and effective standards in the areas of recruitment, advertising, and admissions practices.

*Conclusion:*

ACCSC believes that its standards represent exemplary practices in the areas of student recruitment, advertising, admission practices, and student achievement outcomes measures for the kinds of institutions it accredits. ACCSC also believes that accreditation has a significant role to play in institutional assessments regarding recruiting, advertising, and admissions practices and believes that all accreditors, regardless of the type of institution accredited, should establish and enforce similar rigorous standards in these areas. ACCSC's standards work because they have been developed in a peer review environment – an environment of for-profit institutions that are committed to best practices and institutional and student success. Accreditors can and should continue to be relied upon to establish these standards in conjunction with their institutions keeping in mind the best interest of students. Thus, federal law and regulation should

also continue its historical reliance on professional accreditors to make the appropriate assessments of its accredited institutions. Accreditors, however, also must be committed to enforcing accountability measures with their institutions and also must uphold their role in the triad to ensure that students are always a paramount consideration of our actions.

## **APPENDIX I**

### **ACCSC RECRUITING, ADVERTISING, AND ADMISSIONS STANDARDS**

*Schools must describe themselves to prospective students fully and accurately and must follow practices that permit prospective students to make informed and considered enrollment decisions without undue pressure. The school's recruitment efforts must attract students who are qualified and likely to complete and benefit from the training provided by the school and not simply obtain enrollments.*

#### **A. Recruitment**

*Schools must observe ethical practices and procedures in the recruitment of its students. Ethical practices and procedures include, at a minimum, the following:*

- 1. A school shall use only its employees to conduct student recruiting activities, except outside the United States, its territories, or its possessions, where a school may use third-party agents for recruiting.*
- 2. Schools under common ownership may employ a single recruiter.*
- 3. A school is prohibited from using employment agencies to recruit prospective students.*
- 4. A school is responsible to its students and prospective students for the actions and representations of its recruiters and, therefore, selects recruiters with the utmost care and provides adequate training and proper supervision.*
- 5. Each school complies with applicable state laws and regulations on student recruitment.*
- 6. A school that authorizes its recruiters to advertise, to prepare advertising, or to use promotional materials must approve the materials in advance and accepts full responsibility for the materials used.*
- 7. A school shall ensure that its recruiters do not make false or misleading statements about the school, its personnel, its training, its services, or its accredited status.*
- 8. A school shall not permit its recruiters or other school personnel to recruit prospective students in or near welfare offices, unemployment lines, food stamp centers, homeless shelters, or other circumstances or settings where such persons cannot reasonably be expected to make informed and considered enrollment decisions. Schools may, however, recruit and enroll prospective students at one-stop centers operated under government auspices, provided that all other recruitment and admissions requirements are met.*
- 9. A school may not make explicit or implicit promises of employment to prospective students.*
- 10. A school shall not permit the payment of cash or other consideration to any student or prospective student as an inducement to enroll.*
- 11. A school shall not permit its recruiters to assist prospective students in completing application forms for financial aid.*
- 12. A school shall not permit its recruiters to become involved in admission testing or admission decisions.*
- 13. The school must be clearly identified in all contacts with prospective students.*



*14. Cancellation Policies:*

- a. Applicants who have not visited the school prior to enrollment will have the opportunity to withdraw without penalty within three business days following either the regularly scheduled orientation procedures or following a tour of the school facilities and inspection of equipment where training and services are provided.*
- b. All monies paid by an applicant must be refunded if requested within three days after signing an enrollment agreement and making an initial payment. An applicant requesting cancellation more than three days after signing an enrollment agreement and making an initial payment, but prior to entering the school, is entitled to a refund of all monies paid minus a registration fee of 15% of the contract price of the program, but in no event may the school retain more than \$150.*

*15. A school must provide the applicant with a receipt for any money collected.*

*16. A school must provide the applicant with a copy of the completed enrollment agreement.*

*17. When engaged in recruiting activities, a recruiter is not permitted to use any title, such as "counselor," "advisor," or "registrar," or credential that implies other duties.*

*18. School personnel do not discredit other schools by: falsely imputing to them dishonorable conduct, inability to perform contracts, or questionable credit standing; making other false representations; falsely disparaging the character, nature, quality, value, or scope of their program of instruction or services; or demeaning their students.*

*19. School personnel do not knowingly influence any student to leave another school or encourage a person to change plans after signing an enrollment application and paying the registration fee of another school.*

***B. Catalog***

*1. A school's catalog must accurately portray the school; its educational programs, resources and facilities; and policies and procedures and include, at a minimum, all items listed on the Catalog Checklist. (See also Section I (D)(6), Substantive Standards, Standards of Accreditation.)*

*2. A school's catalog must be designed and written, to convey an accurate and dignified impression of the school. The catalog's illustrations, photos, and narrative must pertain directly to the school and sources of illustrations and photos must be clearly identified.*

*3. A school must provide each applicant with a current and complete catalog prior to signing the enrollment agreement so that each potential student may make an informed decision relative to the school's educational programs, institutional policies, and procedures. A school may provide either a printed and bound copy of the catalog or a read-only format electronic copy that cannot be altered (e.g., portable document format (PDF), etc.). In either case, all versions of the catalog must be identical and students that receive an electronic copy of the catalog must also be able to receive a printed and bound copy of the catalog upon request.*

***C. Enrollment Agreement***

*1. The enrollment agreement must include, at a minimum, all required items listed on the Enrollment Agreement Checklist. (See also Section I (D)(6), Substantive Standards, Standards of Accreditation.)*

2. *The enrollment agreement must clearly state the obligations of both the student and school.*
3. *The school must ensure that each applicant is fully informed of the rights, responsibilities, and obligations of both the student and the school under the enrollment agreement before it is signed by the applicant.*
4. *A complete enrollment agreement is furnished to the applicant at the time the applicant signs.*
5. *No enrollment agreement is binding until it has been signed by the student and accepted by the appropriate school official. A copy of the fully signed enrollment agreement is furnished to the student.*

***D. Advertising and Promotion***

1. *All advertising and promotional materials are truthful and accurate and avoid leaving any false, misleading, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, and its accredited status.*
2. *A school may use the term “University” in its name only when such use has been approved by the Commission and appropriate state authorities.*
3. *The school’s advertising and promotional materials must clearly indicate that education, and not employment, is being offered. No overt or implied claim or guarantee of individual employment is made at any time.*
4. *A school may not use the Employment or Help Wanted classifieds for any form of student recruitment.*
5. *Endorsements used in school catalogs, literature or advertising are used only with the written consent of the authors and are kept on file and subject to inspection. Such endorsements are used only when they are a bona fide expression of the author’s opinions and are strictly factual and portray currently correct conditions or facts. Under no circumstances may currently enrolled students provide endorsements on behalf of the school.*
6. *School literature and advertisements may not quote salaries for an occupation unless they also accurately indicate the normal range or starting salaries in the occupation for which training is provided and include the source of this information.*
7. *Scholarships are not used as a recruiting device.*
8. *A school may use the term “accredited” only if it indicates by what agency or organization it is accredited. Publication of accreditation must comply with the Advertising of Accredited Status form.*
9. *Advertising of financial aid includes an eligibility phrase (e.g., financial aid available for those who qualify).*
10. *A school may describe in its catalog, advertise, or promote new programs, substantive changes, or degree programs only after receiving Commission approval.*

## **ADMISSION POLICIES AND PRACTICES**

*Schools may only admit those students who are capable of successfully completing the training offered. Admission decisions must be based on fair, effective, and consistently applied criteria that enable the school to make an informed judgment as to an applicant's ability to achieve the program's objectives.*

### **A. General Requirements**

- 1. The school must inform, prior to admission, each applicant for enrollment of the program's admission requirements, process, and procedures; the nature of the training and education provided; and the program's responsibilities and demands.*
- 2. The school must:*
  - a. Consistently and fairly apply its admission requirements;*
  - b. Determine that applicants admitted meet such requirements and are capable of benefiting from the training offered;*
  - c. Determine that applicants rejected did not meet such requirements;*
  - d. Ensure that each applicant admitted has the proper qualifications to complete the training; and*
  - e. Secure documentation to demonstrate that each applicant meets all admission requirements.*
- 3. Documentation must exist, covering the last five years, that demonstrates that admission requirements have been met or explains the basis for any denial of admission.*
- 4. The school determines that each applicant has no disabilities, physical or otherwise, that would prevent use of the knowledge or skill gained from the training offered for successful on-the-job performance after completion of the training.*
- 5. No school denies admission or discriminates against students enrolled at the school on the basis of race, creed, color, sex, age, disability, or national origin. Schools must reasonably accommodate applicants and students with disabilities to the extent required by applicable law.*
- 6. Schools may not accept any enrollment from a person of compulsory school age or a person attending a school at the secondary level, unless it has established through contact with properly responsible parties that pursuit of the training will not be detrimental to the student's regular school work.*
- 7. The Commission, at its discretion, may require a school to conduct a study to document the effectiveness of its admission requirements for all students.*

### **B. Non-Degree Programs**

*If the school enrolls a person who does not possess a high school diploma or recognized equivalency certificate (non-degree programs only):*

- 1. The determination of the applicant's ability to benefit from the training offered must be confirmed by documentation of the applicant's achievement of an approved score on a test or tests that have been reviewed by a qualified, independent third party for appropriateness of the instrument and specific score levels required for admission.*

2. *The acceptable score ensures that students will benefit from the training provided and that a substantial number of students will complete the training and be employed in the field for which training was provided.*

**C. Degree Programs - Undergraduate**

*The school must use appropriate techniques to assess whether applicants have the skills and competencies to benefit from the training provided at the undergraduate level. Students admitted to associate or baccalaureate degree programs must have earned at least a high school diploma or recognized equivalency certificate prior to starting class.*

**D. Degree Programs - Graduate**

1. *The school must use appropriate techniques to assess whether applicants have the skills and competencies to benefit from the training provided at the graduate level. A student admitted to a master's degree program must possess an earned baccalaureate degree from a recognized higher-education institution (e.g., accredited by an agency recognized by the U.S. Department of Education or the equivalent). All admission criteria, to include evidence of an earned baccalaureate degree, must be met prior to matriculation.*
2. *For graduate level courses or master's degree programs, standardized or national examinations may be required (e.g., GRE or GMAT). The school may utilize other entrance tests that have been reviewed by a qualified, independent third party for appropriateness of the instrument and specific score levels required for admission. In any case, the school must disclose the type and nature of examination and the acceptable score and/or range of scores applicants must receive to be admitted.*

**E. ESL Programs**

1. *Students enrolled in ESL programs must meet all other admission requirements applicable to students enrolled in the school's career or occupational programs, which may be established through testing in the student's native language. During the enrollment process, adequate translation resources must be available to assist students in their comprehension of the process and all program requirements.*
2. *The school must demonstrate that, with appropriate teaching, the students enrolled in front-loaded and integrated ESL programs can qualify for specialized training or continue their occupational education.*
3. *The school must demonstrate that students enrolled in stand-alone ESL programs possess job skills, as evidenced by documentation of credentials or test scores, and that proficiency in English is needed by the student in order to obtain employment in the field for which trained. The school must also document that students enrolling in a stand-alone program have previously obtained occupational licensure or document that the students possess educational experience that is sufficient to obtain a job in the field for which trained.*

## **APPENDIX II**

### **ACCSC STUDENT LEARNING AND ACHIEVEMENT STANDARDS**

*Student learning outcomes for each program are consistent with the program objectives defined by the institution's program design and development process and meet any relevant academic, occupational, or regulatory requirements (Section VII (A)(1)(a), Substantive Standards, Standards of Accreditation).*

*Student learning outcomes for each program are aligned with the program's objectives, the occupational area of study, and with the level of education intended (e.g., non-degree, degree, degree level) (Section VII (A)(1)(b), Substantive Standards, Standards of Accreditation).*

*Student learning outcomes for each program reflect the necessary occupational and academic knowledge, skills, and competencies as applicable (Section VII (A)(1)(c), Substantive Standards, Standards of Accreditation).*

*The school has a developed and structured process to assess and evaluate the defined student learning outcomes of the education and training and established competencies (e.g., the application of knowledge and skills to the standard of performance articulated in the program objectives and as expected in the workplace). This process may include a variety and combination of methods such as grading, portfolio assessment, and criterion referenced testing based on developed and appropriate rubrics (Section VII (A)(2)(a), Substantive Standards, Standards of Accreditation).*

*The school demonstrates successful student achievement by documenting through its assessment practices that students are acquiring the knowledge, skills, and competencies intended by the program objectives (Section VII (B)(1)(a), Substantive Standards, Standards of Accreditation).*

*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. The school supports these rates through student transcripts, the school's verifiable records of initial employment of its graduates, or other verifiable documentation (Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation).*

**ACCSC STUDENT ACHIEVEMENT BENCHMARKS**

<b>ESTABLISHED BENCHMARK GRADUATION RATES</b>			
<b>Program Length in Months</b>	<b>Average Rates of Graduation Demonstrates Acceptable Student Achievement</b>	<b>Standard Deviation</b>	<b>Established Benchmark Graduation Rates*</b>
1-3	92%	8%	84%
4-6	82%	13%	69%
7-9	69%	14%	55%
10-12	69%	15%	54%
13-15	61%	16%	45%
16-18	59%	17%	42%
19-24	56%	20%	36%
25-35	55%	22%	33%
36+	47%	15%	32%

\*If a school reports a lower graduation rate for a program, that program will be subject to additional monitoring or reporting as deemed appropriate.

<b>ESTABLISHED BENCHMARK EMPLOYMENT RATE</b>			
	<b>Average Rate of Employment Demonstrates Acceptable Student Achievement</b>	<b>Standard Deviation</b>	<b>Established Benchmark Employment Rate*</b>
<b>All Programs</b>	82%	12%	70%

\*If a school reports a lower employment rate for a program, that program will be subject to additional monitoring or reporting as deemed appropriate.