



**POSTSECONDARY, NON-DEGREE GRANTING CAREER AND TECHNOLOGY
INSTITUTIONS USING MSCSS ACCREDITATION TO ESTABLISH ELIGIBILITY
TO PARTICIPATE IN TITLE IV, HEA, PROGRAMS**

**6.3. POSTSECONDARY, NON-DEGREE GRANTING CAREER AND
TECHNOLOGY INSTITUTIONS USING MSCSS ACCREDITATION TO
ESTABLISH ELIGIBILITY TO PARTICIPATE IN TITLE IV, HEA,
PROGRAMS**

6.3.1. The provisions of this Policy 6.3 apply only to those institutions with postsecondary, non-degree granting career and technology programs that have declared to the Commission that they intend to use accreditation by the Middle States Commission on Secondary Schools to establish eligibility to participate in Title IV, HEA, federal student loan programs.

6.3.2. All institutions with postsecondary, non-degree granting career and technology programs shall be expected to meet all Commission policies and requirements except as they may be superseded by Policy 6.3.

6.3.3. Declaration of Intent

6.3.3.1. When an institution that offers postsecondary, non-degree granting career and technology programs submits an Application for Evaluation to request an on-site evaluation by the Commission on Secondary Schools, it will be required to submit a Declaration of Intent stating whether it will use its accreditation to establish eligibility to participate in Title IV, HEA, federal student loan programs.

6.3.3.2. Institutions that declare they will not use their accreditation to establish eligibility to participate in Title IV, HEA, federal student loan programs are not subject to the provisions of this policy. If an institution changes its intent before the expiration of its term of accreditation, the institution will be required to update its self-study and host an on-site visit of its postsecondary programs prior to the Commission's reporting the institution to USDE as an eligible institution.

6.3.4. Notifications

6.3.4.1. Notification to the Secretary of the United States Department of Education, State Departments of Education, State Agencies, and Other Appropriate Agencies: Institutions with postsecondary, non-degree granting career and technology programs are advised that the Commission on Secondary Schools shall comply with all notification requirements of the U.S. Secretary of Education. The U.S. Secretary of Education, appropriate State licensing or authorizing agencies, state departments of education, other relevant accrediting agencies, and the public shall be notified, in writing, within 30 days of any action taken by the Commission related to any institutions with postsecondary, non-degree granting career and technology programs.

6.3.4.2. Notification to the Public: Institutions with postsecondary, non-degree granting career and technology programs are advised that the Commission on Secondary Schools shall notify the public on the Commission's website within 24 hours after notifying the institution of any adverse action taken by the Commission, including probationary accreditation, removal of accreditation, and/or voluntary withdrawal of accreditation by the institution.

6.3.5. Self-Study and Evaluation Protocol:

6.3.5.1. Required Protocol: All institutions with postsecondary, non-degree granting career and technology programs shall be required to engage in a comprehensive, traditional self-study and evaluation as the protocol leading to accreditation by the Commission on Secondary Schools. Acceptable traditional self-study tools are *Reflections on Standards of Quality (C/T)* and the self-study protocol for the Council on Occupational Education. Institutions that have already been accredited as a result of utilizing the *Accreditation For Growth* protocol shall continue to be accredited, but shall not be eligible for Title IV funds, until the next reevaluation at which time a comprehensive traditional protocol must be utilized for reaccreditation.

6.3.5.2. Contents of the Self-Study: The self-study shall include the institution's self-assessment and evaluation of 1) the effectiveness and quality of each of the career and technology and academic programs offered by the institution, 2) the degree to which the institution complies with the Standards for Accreditation and their Indicators of Quality, 3) current levels of student performance, 4) program completion rates, 5) results of follow-up studies of students who have completed their programs, 6) job placement rates and rates of acceptance at degree granting institutions and professional studies, 7) licensing rates, 8) student loan default rates, 9) the institution's strengths and weaknesses, 10) the plans to address these weaknesses and to improve areas identified as priorities for improvement. Each self-study, where appropriate, shall address both the secondary and adult programs within the institution.

6.3.6. Third Party Comment

The Commission on Secondary Schools invites comments from third parties pertaining to postsecondary, non-degree granting career and technology institutions' compliance with the Standards for Accreditation. This includes candidate institutions and those engaged in reaccreditation activities.

6.3.6.1. Notification and Invitation by the Commission: When the dates for an institution's accreditation evaluation are established, notice of the scheduled evaluation will be posted on the Commission's website. The notice will state that the Commission invited third party comments regarding the institution's meeting the Middle States Standards for Accreditation and include the following information:

- Comments must be directly related to the institution's ability to meet the Standards for Accreditation.
- The web address at which the Standards for Accreditation can be viewed (<http://www.css-msa.org/resources/publications.html#standards>)
- The requirement that comments must be in writing and include the commenter's name and address and permission for the comments to be shared with the institution
- The requirement that comments must be received not later than 30 days prior to the first day of the evaluation visit.
- The Commission's address (mailing and e-mail) to which comments and information

can be sent

6.3.6.2. Institutions Scheduled for an Accreditation Evaluation: When the dates for an institution's accreditation evaluation are established, the institution will make public notice that an accreditation evaluation has been scheduled and that the Commission invites third party comments regarding the institution's meeting the Middle States Standards for Accreditation and include the following information:

- Comments must be directly related to the institution's ability to meet the Standards for Accreditation.
- The web address at which the Standards for Accreditation can be viewed (<http://www.css-msa.org/resources/publications.html#standards>)
- The requirement that comments must be in writing and include the commenter's name and address and permission for the comments to be shared with the institution
- The requirement that comments must be received not later than 30 days prior to the first day of the evaluation visit.
- The Commission's address (mailing and e-mail) to which comments and information can be sent

Public notice shall be made by at least two means that are accessible to all the institution's stakeholders. Examples include the institution's website, notice in local newspaper; newsletter mailed or distributed to all stakeholders.

6.3.6.3. Review of Third Party Comments: All third party comments that adhere to Policy 6.3.3. shall be provided both to the institution and to the team chair for consideration.

6.3.6.4. Institutional Response to Third Party Comments: Because comments by third parties provide the Commission with information or evidence regarding an institution's ability to meet Standards for Accreditation, the Executive Director shall provide the forward comments received to the head of the institution prior to the visit of the evaluation team. The institution will be invited to respond to the comments and/or provide evidence to respond to the comments received. The institution may respond in a separate report or as an element of the self-study report submitted to the visiting team and the Commission.

6.3.6.5. Evaluation Team Review: All comments received by the Executive Director that meet the requirements of Policy 6.3.3. and any response to the comments by the institution shall be provided to the chair of the visiting team. The chair of the visiting team shall consider as the comments and response by the institution along with other evidence observed when determining whether the institution meets the Standards for Accreditation. However, it shall not be the responsibility of the visiting team to resolve any concerns presented in the comments.

The visiting team shall not recommend or require any action of the institution based on third party comments unless the comments have been confirmed by other evidence observed by the team.

6.3.7. Evaluation Team Visits, Team Chairs, and Evaluation Team Members

The policy of the Commission is to select highly qualified evaluation teams in order to ensure the most effective evaluation of institutions.

6.3.7.1. Selection Criteria for Chairs of Evaluation Team: The individual chairing the evaluation team is the key person in the evaluation process. Chairs of evaluation teams to postsecondary, non-degree granting career and technology institutions shall possess the following qualifications:

- Expertise or experience relevant to postsecondary career and technology institutions and/or the type of institution being evaluated
- Experience as a member of several previous evaluation teams
- Trained by CSS as a Chair of evaluation teams for postsecondary, non-degree granting career and technology teams
- Demonstrated competence in evaluation, leadership, and writing skills
- Able to conduct prescribed activities within the identified time frame

Typically, team chairs shall be assigned to an institution outside of their own state and are not assigned to neighboring or competing institutions or to institutions in which they have a conflict of interest or potential conflict of interest (see MSCSS Policy 1.6—Conflict of Interest).

6.3.7.2. Selection Criteria, Team Composition, and Training/Retraining for Evaluation Team Members: Evaluation team members assigned to teams evaluating postsecondary, non-degree granting career and technology institutions shall be trained/retrained prior to assuming the role of a team member. Training/retraining shall include knowledge of evaluation processes, Standards for Accreditation, and role expectations of a team member. Training/retraining shall be provided by a member of the Commission's staff, via Commission-developed training materials, and/or by appropriately trained chairs of teams evaluating postsecondary, non- degree granting career and technology institutions.

6.3.7.2.1. Selection Criteria. Members of teams evaluating postsecondary, non-degree granting career and technology institutions meet the following criteria:

- Recommended by a qualified chair of evaluation teams, a head of an institution, a state or county department of education representative, or the Commission's staff
- Expertise or experience relevant to postsecondary, non- degree granting career and technology institutions and/or the type of institution being evaluated.
- Willing to certify that they have no perceived or actual conflict of interest in the institution to be visited.
- Willing to certify that all documents and information will be treated in a confidential manner.

6.3.7.2.2. Qualifications. Teams evaluating postsecondary, non- degree granting career and technology institutions shall be composed of members representing all the following qualifications:

- Include representatives having both administrative and academic backgrounds, including team members with subject matter expertise in the occupational fields within the school to be evaluated. Team members shall not be assigned to neighboring or competing institutions or to institutions in which they have been employees or candidates for employment.
- School administration
- Academic experience
- Subject matter expertise in the academic and career and technology areas being evaluated
- No conflict of interest or potential conflict of interest regarding the institution being evaluated (see MSCSS Policy 1.6—Conflict of Interest).

- If the institution to be evaluated delivers all or part of its education program by one or more distance modalities, an appropriate portion of the members of the Evaluation Team must have expertise and experience relevant to distance education.

6.3.7.2.3. Composition. The size and composition of the evaluation team shall be dependent on the number of the institution's programs, staff members, students, and campuses, the distance between campuses, and whether the purpose of the visit is for initial accreditation or reaccreditation as guided by the following parameters:

- The number of team members will be adequate to perform the required tasks and to conduct a thorough evaluation of the institution.
- Team members will possess education and expertise in one or more of the career and technology programs provided by the institution.
- Team members may be assigned to evaluate a cluster of similar programs.
- The team may include public members or a member of the Commission's staff. .

6.3.7.2.4. Training: All members of an evaluation team will be trained by a member of the CSS staff or by CSS-trained evaluation team chairs prior to the start of an evaluation visit using Commission-developed training materials that include training in the following:

- Understanding and consistent application of the Standards for Accreditation for Career and Technology Institutions
- Requirements of the *Reflections on Standards of Quality (Career and Technology Version) Self-Study Guide*
- Criteria and evidence required for deciding compliance with the Standards for Accreditation
- The appropriate conduct of evaluation team members
- Writing the team report
- If the institution to be evaluated delivers all or part of its education program by one or more distance education modalities, the special Indicators of Quality for Distance Education Institutions and the Supplemental Issues for Distance Education Institutions
- If the institution to be evaluated is a proprietary institution, the special Indicators of Quality for Proprietary Institutions and the Supplemental Issues for Distance Education Institutions

6.3.7.3. Determining Readiness for Evaluation Team Visit: The Commission's staff and the Chair of the evaluation team shall review the self-study in advance of the team visit to ensure readiness of the institution to receive the team.

6.3.7.4. Length of the Evaluation Visit: Typically, the evaluation team's visit will be three or four days in length.

6.3.7.5. Submission of the Evaluation Report: The Chair of the evaluation team shall submit the written evaluation report to the Commission no more than 45 days after the conclusion of the team visit. A copy of the final team report shall be mailed to the institution.

6.3.7.6. Response by the Institution: The institution shall be given the opportunity to respond to the report of the evaluation team. The institution's response shall be made in writing to the Commission and shall be taken into consideration by the advisory

committee, the Membership and Accreditation Committee, and the Commission as a part of making its final decision.

6.3.7.7. Frequency of Onsite Evaluation Team Visits: Postsecondary, non-degree granting career and technology institutions shall receive an onsite visit by a CSS-appointed evaluation team at least once every ten years. Onsite evaluation team visits may, however, occur more frequently as determined by CSS and/or the institution.

6.3.8. Commission Review

The following four-level review process shall be used to ensure full review of postsecondary non-degree granting career and technology institution's accreditation, to guarantee an informed Commission decision, and to ensure consistency in the application of the Standards for Accreditation to the accreditation decision.

1.) Upon receipt of the self-study, the evaluation team report, and the institutional response to the evaluation report, the CSS staff shall conduct a first review of accreditation materials to determine whether Standards for Accreditation are met. The staff shall make an accreditation recommendation.

2.) At least two members of the advisory committee that reviews comprehensive, traditional reports shall review the evaluation team's report, the institutional response to the evaluation report, and the recommendation of the CSS staff to determine whether Standards for Accreditation are met. The report shall be discussed by the full advisory committee, unless it is placed on consent agenda by the two advisory committee readers. The Advisory Committee shall make an accreditation recommendation.

3.) Two Commissioners on the Membership and Accreditation Committee, one of whom shall be from postsecondary career and technology institutions, shall conduct a third review of accreditation materials (self-study, team report, CSS staff analysis and recommendation, advisory committee recommendation, and institutional response to the evaluation report) to determine whether Standards for Accreditation are met. The Membership and Accreditation Committee shall make an accreditation recommendation.

4.) Final action shall be taken by the full Commission based on the recommendations of the Membership and Accreditation Committee, the advisory committee, the CSS staff, and the evaluation team.

All accreditation materials (self-study, team report, staff analysis, advisory committee reports, and institutional responses to the evaluation report) will be made available to every Commissioner for examination.

6.3.9. Time Frames for Further Review and Action for Institutions Not in Compliance

Current U.S. Department of Education regulations require specific time frames for Commission review and action when an institution has been found not to be in compliance with Commission Standards for Accreditation. The time limits to bring the institution into compliance are based on the length of time of the longest program within the institution from enrollment to student completion as follows:

- Programs greater than two years Time limit: up to two years in length
- Programs between one and two Time limit: up to 18 months years in length
- Programs of one year or less Time limit: up to 12 months in length

Time limits are based upon the date of Commission action (not the team visit).

The Commission may, at its discretion, require an institution to report on progress sooner than the maximum time allowed, and may, for good cause (e.g. demonstration of good faith efforts to remedy existing deficiencies and a reasonable expectation that deficiencies

will be remedied within the period of extension), extend the time for demonstrating compliance.

6.3.10. Unannounced Site Visits

The Commission may conduct an unannounced onsite inspection at any time for the purpose of determining whether the institution meets accreditation standards.

6.3.11. Special Requirements of Postsecondary, Non-Degree Granting Career and Technology Institutions

6.3.11.1. Admissions and Transfer Procedures: Postsecondary non-degree granting career and technology institutions must be aware of and abide by those regulations imposed by the United States Department of Education as they apply to admissions and transfer practices. It is the requirement of the Commission on Secondary Schools that all candidate and member institutions shall administer equitable admissions requirements and have clearly stated admissions, transfer, and other student policies appropriate to the mission, goals, programs, and resources of the institution.

6.3.11.2. Student Loan Default Rates: Member institutions that participate in federally guaranteed student loan programs under Title IV HEA must demonstrate diligence in keeping student default rates at an acceptably low level, and they must comply with the program responsibilities incumbent in participating in this program.

6.3.11.3. Certificate Requirements: The institution shall maintain certificate requirements that conform to commonly accepted practice.

6.3.8.4. Sharing Information on Title IV Institutions: By virtue of signing the Program Participation Agreement, Title IV-recognized institutions give permission to the United States Department of Education, the Commission on Secondary Schools of Middle States Association, and its state licensing/authorizing agency to share information about the institution.

6.3.11.5. Notification to CSS Regarding USDE Audits: Institutions required to undergo a United States Department of Education audit must notify the Commission on Secondary Schools that such an audit will occur within ten (10) days of receipt of the USDE request.

6.3.12. Postsecondary, non-degree granting career and technology Institutions Planning To Close

6.3.12.1. Notification to the Commission: A postsecondary, non-degree granting career and technology institution planning to close should report this intention to the Commission as soon as possible, but no later than six months prior to the planned closure date.

6.3.12.2. Teach-Out Agreements: In the case of a closure, students need to be provided with reasonable opportunities to complete their education. Therefore, the closing institution's early report to the Commission must include any draft or finalized teach-out agreement that the institution has entered into or intends to enter into with another institution. The report must demonstrate that the other institution is accredited by another agency recognized by the U.S. Secretary of Education to offer the same career and technology programs and that the agreement is consistent with applicable standards and regulations. The teach-out plan will be approved only if:

- The teach-out agreement provides for equitable treatment of students by ensuring that students are provided, without additional charge, all the instruction promised by the closing institution prior to its closure but not provided to the students because of the closure.
- The teach-out institution has the necessary experiences, resources, and support services to provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the closing institution.
- The teach-out institution is geographically proximate to the closed institution and can demonstrate compatibility of its program and schedule to that of the closed institution.

6.3.12.3. Transfer of Student Records to Other Institutions: Arrangements for timely transfer of student records to other institutions should be made and will require complete academic records, including financial aid records.

6.3.13. Postsecondary, non-degree granting career and technology Institutions Eligible for Title IV Recognition

Only institutions accredited by the Commission on Secondary Schools of the Middle States Association are eligible to be considered as Title IV institutions. Candidate members are excluded from this category.

Policy # _6.3.1-6.3.10. ____

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