

ACCSC
Accrediting Commission of Career Schools and Colleges

INTEGRITY
 ACCOUNTABILITY
 CONTINUOUS IMPROVEMENT
 COMMUNITY

Independent Third-Party Verification

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Foundational Thoughts for Today's Presentation

Meaningful things are happening every day at accredited institutions.

- **Accreditation Tests This Theory Every Day**
 - ACCSC conducts hundreds of on-site evaluations each year
 - Every single day students are going on externships, taking licensure exams, graduating with skills needed to gain entry into a vocational field, and ultimately starting on their career path.
- **Building / Reestablishing Confidence**
 - ACCSC believes that initiatives like the independent verification of graduate employment, unannounced visits, and regular student achievement reporting is building / reestablishing confidence around the success of schools and the students they serve.
- **Positive Trending.**
 - The data that is being gather by ACCSC every year shows that students are graduating at a higher rate and that more graduates are getting jobs as compared to just three years ago.

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ACCSC Student Achievement Benchmark: Graduation

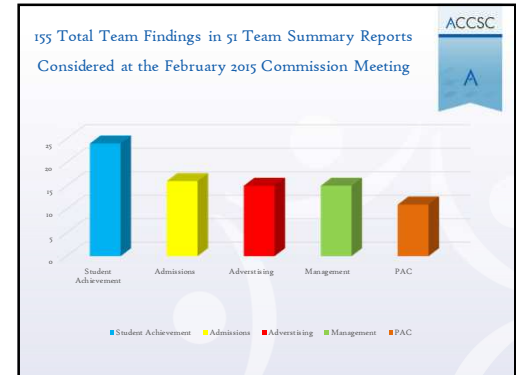
Program Length in Months	Average Rates of Graduation Demonstrates Acceptable Student Achievement	Standard Deviation	Established Benchmark Graduation Rates*	+/-
1-3	92%	8%	84%	-
4-6	84%	11%	73%	+4
7-9	72%	12%	60%	+5
10-12	69%	14%	55%	+1
13-15	65%	14%	51%	+6
16-18	62%	15%	47%	+5
19-23	60%	18%	42%	+6
24+	55%	19%	36%	+3

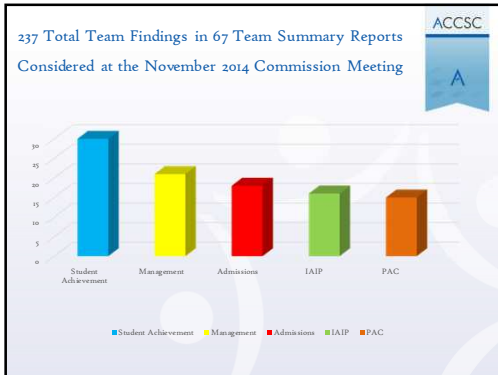
ACCSC Student Achievement Benchmark: Employment

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	Average Rate of Employment Demonstrates Acceptable Student Achievement	Standard Deviation	Established Benchmark Employment Rate*	+/-
All Programs	76%	8%	68%	+2

- Foundational Thoughts for Today's Presentation**
- ACCSC
- Demonstrating successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education remains a significant challenge for ACCSC-accredited institutions
 - Economic conditions, state and national employment trends, geographic location, and student population served can adversely impact a school's ability to meet the Commission's established benchmark rates
 - Assessment of a school's performance in these areas requires a broad consideration of all circumstances that affect student learning, satisfactory progress, and student achievement.





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Pressure Point:
Increased Federalization of Higher Education

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Foundational Thoughts for Today's Presentation

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Increased Federalization of Higher Education

- Accreditation as we know it today has been subject to increased scrutiny and criticism by a variety of organizations and policy makers who have valid questions about whether or not accreditors are fulfilling their promise.
- What has been known to the accreditation community for some time is that the expectations of accreditors are changing such that accreditors are subject to far greater federal oversight than at any time in the past.
- ACCSC embraces the important role that accreditation plays to help ensure
 - 1) the quality of education provided by its member institutions for students; and
 - 2) the continued integrity of the Title IV federal student financial aid program.

ACCSC believes that the third party independent audit requirement significantly strengthens accreditation and helps to **change the dialogue from skepticism to confidence.**

Foundational Thoughts for Today's Presentation



- A key example of how accreditors have embraced the challenge of demonstrating that accreditation is both reliable and dependable without increased involvement by the federal government is in the area of student achievement assessment.
- ACCSC recently adopted a policy requiring institutions seeking accreditation to engage an independent third-party auditor to verify the most recently reported graduate employment data as a means:
 - to bolster confidence in accreditation and
 - to reinforce a long standing requirement that institutions maintain "verifiable records of initial employment."
- ACCSC, along with other recognized accrediting agencies, continue to demonstrate that the enterprise of accreditation is evolving and improving.



Independent Third-Party Verification of Employment



Foundational Thoughts for Today's Presentation



In 2011 ACCSC began engaging an independent third-party to verify the employment data submitted by schools selected as part of the annual random sample of the Annual Reports.

- In the first three years, ACCSC examined approximately **10,000** graduate employment records:
 - 4,073 Records in 2011
 - 2,423 Records in 2012
 - 3,390 Records in 2013

Based on the success of this initiative, in July 2013 ACCSC announced an independent third-party employment verification requirement as part of the initial and renewal of accreditation process.

ACCSC continues to do a random sampling of graduate employment records reported in the ACCSC Annual Report

- Schools engaged in the renewal of accreditation process are removed from that random sampling the year before and year after their renewal year.

Independent Third-Party Verification of Employment



The purpose of the requirement is:

- a) to assess the school's compliance with established student achievement benchmarks and whether the school has "verifiable" records of employment; and
- b) to ensure that the institution's records can be relied upon in making decisions about a school's compliance with the accreditor's student achievement standards and benchmarks.

Independent Third-Party Verification of Employment Process



- The school must engage an independent third-party to verify the employment data in the Graduation and Employment ("G&E") Chart(s) submitted in the most recently submitted Annual Report at the time of the due date of the SER.
- The independent third-party must select **minimally a 50% sample of employed graduates** (classified as "Graduates - Employed in the Field") and report the results **from that sample**.
 - Once the 50% sample has been selected by the independent third-party, for the purposes of this application, the independent third-party may not alter the sample in an effort to get better results.

The school must provide the following as part of the SER:



A summary of results for **each G&E Chart** that includes the following (at a minimum):

- a. The **total number of students** in the sample; and
- b. The **number of students** in each of the categories below and the **percentage** in each category:
 - **Verified as Correct** (graduate's employment is verified as listed in the school's record);
 - **Not verified** (unable to verify after all attempts);
 - **Verified as Not Correct** (e.g., graduate not found in employer records, position is unpaid/externship, other discrepancies); and
 - **Verified but Different** (e.g., different start date, job title, employer, etc.).

Any additional information or response the school deems appropriate regarding the above results.

Independent Third-Party Verification of Employment



- An on-site evaluation team will review the verification results from the independent third-party verification in order to assess if the student achievement data reported to ACCSC are accurate and supported by verifiable records.
- A school may provide the updated information to the on-site evaluation team and may have the independent third-party update the summary of results as long as the updated information was subject to the same methodology identified in the school's SER.
- If an on-site evaluation team does find that a school has not demonstrated compliance with accrediting standards due to the accuracy or validity of the data, the team will likely include a team finding in the Team Summary Report and the school will be required to respond to the Commission with supporting documentation to demonstrate that the student achievement data is accurate and verifiable.

The Commission, not the on-site evaluation team, makes the final determination regarding a school's compliance with accrediting standards.



First Look


- 2011, 2012, and 2013 ACCSC Annual Reports
- 2014 / 2015 – Accreditation Cycle

First Look – 2011 Annual Report




80 Schools Randomly Selected for Independent Verification

- Approximately 10% of ACCSC Membership (minus schools active in the renewal of accreditation process)
- 4,073 Employment Records
- The percentage of records classified as **"Verified as Correct"**
 - 69.7% (2,839 of 4,073)
- The percentage of records classified as **"Unable to Verify"**
 - 24.6% (1,002 of 4,073)
- The percentage of records classified as **"Verified as Not Correct"**
 - 5.7% (231 of 4,073)

First Look – 2012 Annual Report 


77 Schools Randomly Selected for Independent Verification

- Approximately 10% of ACCSC Membership (minus schools active in the renewal of accreditation process)
- 2,423 Employment Records
- The percentage of records classified as **“Verified as Correct”**
 - 73.8% (1,789 of 2,423)
- The percentage of records classified as **“Unable to Verify”**
 - 19.4% (469 of 2,423)
- The percentage of records classified as **“Verified as Not Correct”**
 - 3.6% (88 of 2,423)

First Look – 2013 Annual Report 


71 Schools Randomly Selected for Independent Verification

- Approximately 10% of ACCSC Membership (minus schools active in the renewal of accreditation process)
- 3,390 Employment Records
- The percentage of records classified as **“Verified as Correct”**
 - 71% (2,408 of 3,390)
- The percentage of records classified as **“Unable to Verify”**
 - 21.8% (740 of 3,390)
- The percentage of records classified as **“Verified as Not Correct”**
 - 3.6% (122 of 3,390)


First Look – 3 Year Averages 

228 Schools Randomly Selected for Independent Verification


- 9,886 Employment Records
- The percentage of records classified as **“Verified as Correct”**
 - 71% (7,036 of 9,886)
- The percentage of records classified as **“Unable to Verify”**
 - 22.3% (2,211 of 9,886)
- The percentage of records classified as **“Verified as Not Correct”**
 - 4.4% (441 of 9,886)


First Look – 2014/2015 Accreditation Cycle 

- 85 Schools active in the Renewal of Accreditation Process
 - Approximately 5,700 records
- 99% (84 of 85) schools met the required 50% sample.
 - 5% (4 of 85) four schools had 100% samples.
- The average percentage of records classified as "Verified as Correct"
 - 80%
 - The median is 87% for the same category.
 - 27% (23 of 85) reported 100% "Verified as Correct"
- The average percentage of records classified as "Unable to Verify"
 - 13%.
 - The median for the same category is 5%.

First Look – 2014/2015 Accreditation Cycle 

- The average percentage of records classified as "Verified as Not Correct"
 - 1.6%.
 - The median for the same category is 0%.
- The average percentage of records as "Verified but Different"
 - 4.5%.
 - The median for the same category is 0%


 Accrediting Commission of Career Schools and Colleges



Guidelines for Employment Classification

Guidelines for Employment Classification



- What constitutes an employed graduate in a training related field ?
 - How does a school justify that classification?
- The school is responsible for justifying, with documentation, every graduate classified as employed.
 - The burden of compliance rests with the institution.

In addition to these guidelines, the Commission expects that schools will regularly gather information from employers as a means to assess the preparedness of graduates for employment and make program modifications as may be necessary based on that feedback.

Guidelines for Employment Classification



The school must be able to justify the classification of each graduate as employed using the following guidelines:

- The employment classification is appropriate and reasonable based on the educational objectives of the program.

The employment is

- for a reasonable period of time,
- is based on program objectives, and
- can be considered sustainable (e.g., not a single day of employment).

- The employment is directly related to the program from which the individual graduated, aligns with a majority of the educational and training objectives of the program, and is a paid position.

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Program Viability

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Program Viability



ACCSC expects schools to conduct a **realistic assessment** of the viability of program offerings and the factors impacting student achievement.

- At what rate are students graduating?
- At what rate are graduates passing licensure exams?
- At what rate are graduates getting a job in a training related field?

Program Viability



- Are graduation and employment rates getting better?
 - Getting worse?
- Are there any mitigating factors impacting the school's ability to demonstrate successful student achievement?
- Did the school examine the rates of student graduation in relation to admissions standards?
- What changes has the school made with respect to the program curriculum or career service initiatives?

ACCSC
Assessing Commitment of Career Schools and Colleges

Lessons Learned

Lessons Learned ACCSC

- **Start Early.**
 - The Importance of Real Time Verifications
 - Older Data Has Proven to be More Difficult to Verify
- **Incorporate** third-party verification into regular on-going process – at least for the SER data.
 - Not simply once every five years.
- **Set expectations** with Career Services
 - Random, Unannounced, In-House Review of Graduate Employment BEFORE subjected to Third-Party Audit.
 - Ensure Complete, Clear, Legible, Graduate Employment Records
 - Job Titles, Job Responsibilities

Lessons Learned ACCSC

- **Set expectations** with students
 - First Day of Orientation and throughout the program
 - Help Students to Understand Their Role in the Accountability Framework
 - New Student Letter
 - Graduation Letter
 - Establish protocols for post-graduation activities that can be managed and tracked.
 - Admissions Protocols as Template
- **Work proactively with Employers**
 - Set expectations, Get feedback
 - Major Employers – Batching Verification

Lessons Learned ACCSC

Ensure results that are provided by the independent third party are:

- **Useful** – The report should provide specific details in each of the categories identified that presents the results in an easy to understand format for the school.
- **Usable** – Does the report provide the necessary information, in an organized, detailed fashion to afford the school an opportunity to explore any “unable to verify” or “verified as not correct”?
 - For any graduate found to be “verified as not correct” the report should be specific as to why.
- **Sortable** – the school should be able to easily sort through the data, for example by category or by employer, to gain additional information on any trends in the results of the audit.

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