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ABSTRACT

The committee's activity during 1976 revolved mostly around the review of petitions and interim reports relating to the Commissioner's authority to list recognized accrediting and state approval agencies. The committee reviewed 70 petitions and reports. As a result of its recommendations, one agency was added to the list of nationally recognized accrediting agencies and associations, recognition was continued for 27 agencies, and extension of scope of recognition was granted to seven agencies. Accepting the committee's recommendations, the commissioner also awarded eligibility status for federal funding programs to two institutions, and he determined that the Community College of the Air Force has met the criteria for awarding the Associate in Applied Sciences degree. The committee's usual review of policy matters was limited during this year, but it did review several developments in legislation, the current criteria for recognition, advisory committee functions, operating procedures and role, and relationships between the private accrediting and education community and the U.S. Office of Education. (MSE)

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DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE  
OFFICE OF EDUCATION  
BUREAU OF HIGHER AND CONTINUING EDUCATION  
Division of Eligibility and Agency Evaluation

# ADVISORY COMMITTEE ON ACCREDITATION AND INSTITUTIONAL ELIGIBILITY

## ANNUAL REPORT 1976

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## INTRODUCTION

The Advisory Committee on Accreditation and Institutional Eligibility is established pursuant to Section 253 of the Veterans' Readjustment Assistance Act (Chapter 39, Title 38, U.S. Code), and subsequent legislation. It is governed by provisions of Part D of the General Education Provisions Act (P.L. 91-230 as amended; 20 U.S.C. 1233 et seq.) and the Federal Advisory Committee Act (P.L. 92-463; 5 U.S.C. Appendix I), which set forth standards for the formation and use of advisory committees. The Committee is established to advise the U.S. Commissioner of Education in fulfilling his statutory obligations to publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authorities concerning the quality of training offered by education institutions and programs. It also serves to advise the Commissioner in fulfilling his statutory obligation to publish a list of State agencies which he has determined to be reliable authorities concerning the quality of public postsecondary vocational education in their respective State, pursuant to Section 438(b) of the Higher Education Act of 1965, as amended by P.L. 92-318. A complete list of the Committee's functions, as well as its purpose and structure, can be found in the Committee Charter, Appendix I.

### Advisory Committee Membership

The fifteen members of the Committee are representative of educational institutions, various levels and types of accreditation, professional associations, State departments of education, the general public and the student/youth population. They include representation from the ranks of women and minorities, and from all geographic regions of the country. The members are appointed to three-year terms by the Secretary of Health, Education, and Welfare. The composition of the Committee changes every June, when the terms of one-third of the members expire. Ordinarily, no member is eligible for reappointment to a second consecutive term. Nominations for member-

ship on the Committee are welcome. Names, and resumes if available, should be submitted to the Director of the Division of Eligibility and Agency Evaluation, U.S. Office of Education. Although nominations are accepted at any time, those submitted by November of any year are most likely to be considered for terms beginning the following July, while those submitted after November are likely to be reserved for consideration one year later.

### 1976 Advisory Committee Actions

The Committee met four times during 1976. All meetings were open to the public, except for a fifteen-minute session of Subcommittee 1 on March 25. One result of the greater number of open meetings has been an increase in the number of individuals and organizations who, although they do not themselves have petitions pending before the Committee, appear for oral presentations regarding petitioning agencies. All Advisory Committee meetings are tape recorded, and a copy of the transcript is available for examination in the offices of the Division of Eligibility and Agency Evaluation. A list of the 1976 Advisory Committee meetings, including the times during which the March meeting was open or closed, is found in Appendix VI. Appendix VI also contains a list of scheduled meetings for 1977, and Appendix VII includes a list of agencies scheduled for review through March 1981. Committee discussions during the closed portion of the March meeting are included in Part I of this report, under the American Medical Association and the American Physical Therapy Association.

The Committee's activity during 1976 revolved mostly around the review of petitions and interim reports relating to the Commissioner's authority to list recognized accrediting and State approval agencies. The Committee reviewed 70 petitions and reports, and as a result of its recommendations, one agency was added to the list of nationally recognized accrediting agencies and associations, recognition was continued for twenty-seven

accrediting agencies and extension of scope of recognition was granted to seven agencies. Presently, there are 69 nationally recognized accrediting agencies and associations. As a result of Committee recommendations, four agencies were added to the list of State agencies recognized for the approval of public postsecondary vocational education and recognition of six State agencies was continued. One agency withdrew from the recognized list, and one agency served notice that it would not seek renewal of recognition when its term of recognition expires in March 1977. Currently, there are fourteen recognized State agencies for the approval of public postsecondary vocational education.

Accepting Committee recommendations, the Commissioner also awarded eligibility status for Federal funding programs to two institutions which demonstrated satisfactory assurance that they would meet the accrediting standards of a recognized agency within a reasonable period of time, and he determined that the Community College of the Air Force has met the criteria for the award of the Associate in Applied Sciences Degree. The Commissioner's determinations of satisfactory assurance were made pursuant to his authority under the Higher Education Act of 1965, as amended, section 1201(a)(5)(A), and under the Public Health Service Act (42 U.S.C. 201). The action regarding the Community College of the Air Force was made pursuant to his authority under the 1954 *Federal Policy Governing the Granting of Academic Degrees by Federal Agencies and Institutions*, and under current authorizing legislation (subsection (c) of 10 U.S.C. 9315).

While most of the Committee's time is occupied with review of petitions, it also must review policy issues which affect accreditation and eligibility. During 1976, the Committee's review of policy matters was hampered by the amount of time needed to review petitions, and by administrative and budgetary restrictions which discouraged scheduling of its annual policy review meeting. Nevertheless, the Committee reviewed several developments regarding legislation; the current Criteria for Recognition; Advisory Committee functions, operating pro-

cedures and role; and relationships between the private accrediting and education community and the U.S. Office of Education. The Committee used two of its meetings to provide a forum for discussions of mutual concern with non-Federal educators. A discussion of the policies which the Committee reviewed is found in Part II of this report.

### Procedures for Review of Petitions for Recognition

Reviewing petitions for recognition occupies the majority of the Committee's time. The Committee's review procedure is as follows: An agency presents its petitions to the Division of Eligibility and Agency Evaluation three months in advance of the Committee's next meeting. Review of the petition is assigned to one of the Committee's two subcommittees. Copies of the petition are mailed to the subcommittee members, and, providing there are enough available, to the remainder of the Committee. Site visits by Division personnel and/or consultants to the Office of Education are conducted, and the reports from these visits are included among the review materials. The Division staff develops an analysis of the petition based upon the published Criteria for Recognition. This analysis is mailed in advance to Committee members, to the petitioning agency and to interested third parties who have requested a copy of it.

During its meeting, Committee members meet for a time as two separate subcommittees. The subcommittees, supported by staff and consultants, review the merits of each petition and hear oral presentations by representatives of the petitioning agencies and by interested third parties who have requested an appearance. Following the presentations, the subcommittees conduct a final review of the petitions and prepare recommendations for the full Committee. The full Committee reviews the subcommittee reports and develops recommendations to the Commissioner. The Commissioner then approves or disapproves the recommendations, and notifies the agency in question of that action. Finally, changes in the lists of recognized agencies are published from time to time in the FEDERAL REGISTER.

## PART I

### COMMITTEE ACTIONS REGARDING PETITIONS AND INTERIM REPORTS

For the full text of criteria references cited in the Committee's actions, please see the appropriate appendix:

Criteria for Recognition of National Accrediting Bodies Appendix II

Criteria for Recognition of State Agencies for the Approval of Public Postsecondary Vocational Education Appendix III

Criteria for Recognition of State Agencies for the Approval of Nurse Education Appendix IV

Federal Policy Governing the Granting of Academic Degrees by Federal Agencies and Institutions Appendix V

Unless otherwise indicated in the text, actions by the Committee were approved by the U.S. Commissioner of Education on the following dates:

March 23-26 Meeting	May 6, 1976
June 16-18 Meeting	August 3, 1976
September 21-24 Meeting	October 27, 1976
December 8-10 Meeting	January 12, 1977

#### A. Nationally Recognized Accrediting Agencies and Associations

##### Accrediting Bureau of Medical Laboratory Schools

September 21-24, 1976: *Petition for renewal of recognition for accreditation of private medical assistant educational institutions and programs, and schools and programs for the medical laboratory technician.* Recognition is continued for a period of

four years. The Bureau is urged, however, to give its attention to areas of the Criteria for Recognition where its compliance is not technically satisfactory. First, regarding criterion (a)(3)(iii)(A) (qualitative assessment), the Bureau should give its attention to the encouragement of broader participation in producing the self-study document. Second, while the Bureau currently provides a written decision of the appellate body to the chief executive officer of a school or program in matters of adverse decisions, this policy is not clearly specified in the Bureau's written procedures, as required by criterion (b)(3)(viii)(C) (written decision). During its meeting, the Advisory Committee reviewed additional written material submitted by the Bureau, and by Richard L. Egan, Secretary, Council on Medical Education, American Medical Association, who opposed continued recognition of the Bureau's accreditation of private medical assistant education institutions and programs, and public medical laboratory technician education programs. The Committee also heard an oral presentation by representatives of the Bureau.

##### Accrediting Commission on Education for Health Services Administration

1. December 8-10, 1976: *Petition for extension of scope of recognition to include accreditation of graduate programs in health services administration.* Recognition is granted until December 1977. The Commission has demonstrated satisfactory compliance with the Criteria for Recognition. The limitation upon the period of recognition is designed to phase the review of this activity into the regular cycle of review of the Commission's other accrediting activities.

2. December 8-10, 1976: Interim Report. The report is accepted. The Commission has responded satisfactorily to the Commissioner's letter of December 11, 1975.

The Advisory Committee reviewed both the report and the request for an extension of scope during its December 8-10 meeting. During the meeting, the Committee reviewed additional written material submitted by the Commission and by Janet Strauss, Executive Director, Council on Education for Public Health, who attested to new areas of successful cooperation established between the Council and the Accrediting Commission. The Committee also heard an oral presentation by representatives of the Commission.

#### **American Assembly of Collegiate Schools of Business**

June 16-18, 1976: *Petition for renewal of recognition for accreditation of baccalaureate and graduate degree programs in business and management.* Recognition is continued until September 1979, contingent upon the Assembly's demonstration of satisfactory compliance with criterion (b)(2)(i) (public representatives) of the Criteria for Recognition, during its review in September 1977.

#### **American Association of Marriage and Family Counselors, Committee on Accreditation**

September 21-24, 1976: *Petition for initial recognition for accreditation, and for preaccreditation as "Correspondent," of master's and doctoral degree programs in marriage and family counselor training.* Initial recognition is denied. The Committee on Accreditation has failed to demonstrate satisfactory compliance with criteria (a)(1)(i) (regional or national) and (ii) (definition of scope); and (b)(1)(i) (consideration of constituencies), of the Criteria for Recognition. Particular concerns regarding the Committee on Accreditation's compliance with these criteria relate to the limited number of programs evaluated to date; the unknown size of the Association's universe; the seeming lack of a defined accrediting program which is universally accepted; the lack of clearly defined accreditation standards; and the matter of need for a separate agency to accredit programs in this field. However, in view of the apparent need for effective evalua-

tion of education programs in marriage and family counseling, the Division of Eligibility and Agency Evaluation is directed to employ consultants to ascertain if there is a defined educational program universe in this area, to review the feasibility of developing an acceptable accrediting program in this area, and to prepare a report of findings to the Advisory Committee. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Committee on Accreditation.

#### **American Association of Nurse Anesthetists, Council on Accreditation**

September 21-24, 1976: *Petition for renewal of recognition for accreditation, and for the award of the status of "Preaccreditation," of professional schools/programs of nurse anesthesia.* Recognition is continued for a period of three years. At the end of one year, the Council on accreditation will be expected to submit to the Advisory Committee a report indicating:

- a. progress toward establishment of a program of evaluation of its educational standards designed to assess their validity and reliability—criterion (b)(5) (validity of standards) of the Criteria for Recognition—with the assessment expected to involve appropriate constituencies, including physician educators;
- b. evidence of continued representation in policy and decision-making bodies of the community of interests affected by the Council's accreditation programs—criterion (c)(4) (reflects community of interests);
- c. assurance that the Council performs no functions inconsistent with its ability to make independent judgments of the quality of education programs—criterion (d)(1) (independence of function); and
- d. implications of the Council's requirement for the CRNA certificate as a condition for membership on nurse anesthesia faculties.



During its meeting, the Advisory Committee reviewed additional written materials submitted by the Council, by Richard Ament, President-elect of the American Society of Anesthesiologists and by James F. Arens, President of the Faculty of Nurse Anesthesia Schools. The Committee also heard oral presentations by representatives of the Council and by Dr. Ament and Dr. Arens. Dr. Ament and Dr. Arens opposed continued recognition for the Council. The presentations were attended by approximately 150 observers.

#### **American Bar Association, Council of the Section of Legal Education and Admissions to the Bar**

December 8-10, 1976: *Interim report.* The report is not accepted, and the Council is requested to submit an additional written and oral report at the March 1977 Advisory Committee meeting. In concluding that the report is not satisfactory, the Committee suggests that the Council may not be acting in good faith in its promises to conduct a study of accreditation in the proprietary law school field, and to address other previously raised issues regarding the Council's compliance with the Criteria for Recognition. The Council's March report is expected to demonstrate progress toward achieving satisfactory compliance with criteria (b)(2)(i) (public representatives), (b)(2)(iv) (complaint review procedures) and (b)(6) (requires output evaluation). The report also will be expected to contain the results of a completed study of accreditation of proprietary law schools, and to respond to issues raised by representatives of the Western State University College of Law of Orange County (California) during their presentation before the Advisory Committee on December 9, 1976. In addition to that presentation, the Committee also heard a presentation by representatives of the Council, and the Committee reviewed additional written material submitted by the Council and by John W. Black, Assistant Dean of the Western State University College of Law, who urged rejection of the report and opposed continued recognition of the Council. Committee members Thomas Shearer and Harold

Crosby disclosed that they are members of the ABA and their respective state bar associations, but do not hold office in these organizations. They announced their intention to discuss and vote on the Council's report, unless there was opposition from the Committee. There was none. Dean John Irving participated in the discussion on the report, but abstained from voting due to his direct involvement in legal education.

#### **American Board of Funeral Service Education, Commission of Schools**

September 21-24, 1976: *Petition for renewal of recognition for accreditation of independent schools and collegiate departments of funeral service education.* Recognition is continued for a period of four years. The Commission is, however, urged to give serious consideration to two areas of the Criteria for Recognition in which it has demonstrated minimal compliance. The Commission should consider establishing training seminars and workshops for potential visiting team leaders and members and should, in its published lists, include all levels of institutional status and provide identification of the various approved program levels. During its meeting, the Committee heard an oral presentation by representatives of the Commission.

#### **American Council on Education for Journalism, Accrediting Committee**

March 23-26, 1976: *Petition for renewal of recognition for accreditation of first professional degree programs in journalism.* Recognition is continued for a period of four years. The Council has demonstrated compliance with most of the Criteria for Recognition. At the end of one year, the Accrediting Committee is requested to submit to the Advisory Committee a report demonstrating progress toward satisfactory compliance with the following criteria of the Criteria for Recognition: (a)(3)(i) (definitions/procedures), specifically, the development of definitions

of probationary status and of provisional status; (b)(2)(i) (public representatives), specifically, written assurance of the appointment of additional public members to the Council; (b)(2)(iii) (notice of standards revision), specifically, evidence of steps taken to provide notice of proposed or revised standards to all institutions with accredited programs in journalism; and (b)(2)(iv) (complaint review procedures), specifically, the development of a written complaint procedure. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Accrediting Committee.

#### **American Library Association, Committee on Accreditation**

December-8-10, 1976: *Request for postponement of review of petition for renewal of recognition from March 1977 to December 1977.* The request is denied. The Committee on Accreditation requested the postponement because it was unable to schedule a site visit for observation by USOE personnel until the fall of 1977. In rejecting the request, the Advisory Committee notes that the postponement would amount to the equivalent of continuing recognition for an extended period of time without some kind of formal report upon which to base its decision. The Committee indicates that the Division of Eligibility and Agency Evaluation should determine whether, for administrative reasons, the review should be rescheduled. The Committee further expresses the need for developing a consistent policy regarding the issue of lengthy postponements. (No action was required by the Commissioner; subsequently, DEAE rescheduled the review for September 1977.)

#### **American Medical Association, Council on Medical Education**

1. March 23-25, 1976: *Petition for renewal of recognition as the coordinating agency for allied health education accreditation.* Recognition is continued for a period of two years. At the end of one year, the Council on Medical Education (CME) is expected to submit to the Advisory Committee a report demon-

strating substantial progress in reorganizing its accrediting program so as to further address the issues of proliferation and fragmentation (criterion (b)(1)—need), and to reflect the community of interests in the area of allied health education accreditation (criterion (c)(4)—reflects community of interests). The Council's petition provided insufficient information to determine its compliance with the following criteria: (b)(2)(ii)(D) (publication of names of personnel), (b)(2)(ii)(E) (publicly available information regarding its legal organization), (b)(2)(iii) (notice of standards revision), (b)(5) (validity of standards), and (b)(10) (accurate reference). The Committee indicated that if the Council does not offer satisfactory evidence of progress in the areas cited above, the Committee will consider recommending that the Commissioner request the Council to show cause why his recognition of the CME as the coordinating agency for allied health education accreditation should not be withdrawn. During its meeting, the Advisory Committee reviewed additional written material submitted by Nancy I. M. Preuss, President of the American Society for Medical Technology, who criticized the collaborative arrangement in allied health education accreditation, particularly as it applies to the National Accrediting Agency for Clinical Laboratory Sciences. The Committee also heard an oral presentation by Dr. Preuss. In addition, the Committee heard oral presentations by representatives of the CME and by representatives of each of the collaborating agencies listed below, except the Joint Review Committee on Educational Programs for Physician's Assistants and the Joint Review Committee on Education in Radiologic Technology. The Committee heard two presentations from representatives of the American Physical Therapy Association. From 1:10 to 1:25 p.m., Thursday, March 25, Subcommittee 1 of the Advisory Committee conducted a closed session, in accordance with Section 10(d) of the Federal Advisory Committee Act (P.L. 92-463) and clauses (4) and (6) of subsection (b) of section 552 of Title 5 of the United States Code. During this session, the subcommittee discussed financial matters involving the CME and its collaborating agencies. The discussion also included comments regarding various individuals associated with the Council on Medical Education,

the American Physical Therapy Association and the American Society for Medical Technology. The subcommittee took no formal action and proposed no recommendations to the full Committee during the closed session. Dr. George L. Grassmuck, Chairperson of the Advisory Committee, stepped down from the Chair in order to participate in the full Committee discussions of the petitions of the CME and its collaborating agencies. Dean John Irving served as Chairperson during these discussions.

2. December 8-10, 1976: The Council is requested to present, during the June 15-17, 1977, Advisory Committee meeting, justification for its continued recognition as the accrediting agency for physical therapist education. The Commissioner's request relates to the American Physical Therapy Association's withdrawal from the CME collaborative arrangement (please see below).

**American Medical Association, Council on Medical Education, in cooperation with:**

**1. Accreditation Committee, American Occupational Therapy Association**

March 23-26, 1976: *Interim report.* The report is accepted. The Accreditation Committee has responded satisfactorily to previous concerns.

**2. Committee on Accreditation in Education, American Physical Therapy Association**

March 23-26, 1976: *Petition for renewal of recognition for accreditation of professional programs for the physical therapist.* Recognition is continued for a period of two years, with the specification that at the end of one year, the Association will be expected to submit a report demonstrating satisfactory progress toward resolving issues relating to the

physical therapy assistant education programs and the publication of revised *Essentials* for physical therapist education. The Committee on Accreditation also submitted a petition for recognition outside the collaborative arrangement with the CME/AMA. This is treated below.

**3. Curriculum Review Board, American Association of Medical Assistants**

March 23-26, 1976: *Petition for renewal of recognition for accreditation of one- and two-year medical assistant programs.* Recognition is continued for a period of four years. The Board has demonstrated satisfactory compliance with most of the Criteria for Recognition. At the end of one year, the Board will be expected to submit a report demonstrating action taken to include Board member affiliations in the published list of the Board's membership. (criterion (b)(2)(ii)(D)—names of personnel). The report also will be expected to include an account of the Board's progress toward collaborating with the Accrediting Bureau of Medical Laboratory Schools in such areas as (1) the development of a common self-survey instrument and common survey procedures; (2) cooperation in joint surveys; (3) establishment of a liaison committee; and (4) development of a long range plan of cooperation. Recognition of the Board is contingent upon continuation of the Commissioner's recognition of the Council on Medical Education as the "umbrella" agency, following its next review.

**4. Education and Registration Committee, American Medical Record Association**

March 23-26, 1976: *Interim report.* The report is accepted. The Education and Registration Committee has responded satisfactorily to previous concerns.

5. **Joint Review Committee on Educational Programs for Physician's Assistants, which is sponsored by the American Academy of Family Physicians, American Academy of Pediatrics, American Academy of Physician's Assistants, American College of Physicians, American College of Surgeons and American Society of Internal Medicine**

a. March 23-26, 1976: *Petition for extension of scope of recognition to include accreditation of programs for the surgeon's assistant.* Extension of scope of recognition, to include accreditation of programs for the surgeon's assistant, is granted. Recognition of the Joint Review Committee on Educational Programs for the Assistant to the Primary Care Physician is transferred to the Joint Review Committee on Educational Programs for Physician's Assistants. The scope of recognition of the Joint Review Committee on Educational Programs for Physician's Assistants is to be listed as "accreditation of programs for the assistant to the primary care physician and for the surgeon's assistant."

b. March 23-26, 1976: *Interim report regarding accreditation of programs for the assistant to the primary care physician.* The report is accepted. The Joint Review Committee has responded satisfactorily to previous concerns.

6. **Joint Review Committee on Educational Programs in Nuclear Medicine Technology, which is sponsored by the American College of Radiology, American Society of Clinical Pathologists, American Society for Medical Technology, American Society of Radiologic Technologists and the Society of Nuclear Medicine**

March 23-26, 1976: *Petition for renewal of recognition for accreditation of programs for the nuclear medicine technologist.* Recognition is continued for a period of two years. The Joint Review Committee will be expected to submit to the Advisory Committee, at the end of one year, a report on

action taken by the AMA's House of Delegates regarding the Joint Review Committee's new *Essentials*, and reflecting satisfactory development of its self-study instrument.

7. **Joint Review Committee on Education in Radiologic Technology, which is sponsored by the American College of Radiology and the American Society of Radiologic Technologists**

March 23-26, 1976: *Interim report.* The report is accepted. The Joint Review Committee has responded satisfactorily to previous concerns.

8. **National Accrediting Agency for Clinical Laboratory Sciences, which is sponsored by the American Society for Medical Technology and the American Society of Clinical Pathologists**

March 23-26, 1976: *Petition for renewal of recognition for accreditation of educational programs for the laboratory assistant and schools and programs for the medical laboratory technician.* Recognition is continued for a period of two years. The Agency has demonstrated satisfactory compliance with the Criteria for Recognition. The limitation on the Agency's period of recognition is designed to bring the review of its accrediting activities in these two areas into the regular cycle of review of its accrediting activities in other areas.

- American Optometric Association, Council on Optometric Education**

December 8-10, 1976: *Petition for renewal of recognition for accreditation, and preaccreditation as "Reasonable Assurance" and "Preliminary Approval," of professional programs in optometry.* Recognition is continued for a period of four years. The Council has demonstrated satisfactory compliance with most of

the Criteria for Recognition. At the end of one year, the Council will be expected to submit to the Advisory Committee a report addressing concerns regarding its compliance with the following criteria: (a)(1)(ii) (definition of scope), (b)(2)(i) and (c)(4) (public representatives) and (b)(3)(viii)(A) (no change in status). In addition, the report should address itself to the matter of the Council's preference for its accredited programs to be located in university settings. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Council.

#### American Osteopathic Association

June 16-18, 1976: *Petition for renewal of recognition for accreditation, and for preaccreditation as "Preaccreditation Status" and "Provisional Approval," of programs leading to the D.O. degree.* Recognition is continued for a period of two years. At the end of one year, the Association will be expected to demonstrate progress toward satisfactory compliance with criteria (b)(2)(ii)(C) (current status), (b)(2)(iii) (notice of standards revision) and (b)(2)(iv) (complaint review procedures), of the Criteria for Recognition. In addition, it should demonstrate that it has taken measures to clarify its policies and procedures documents concerning its due process procedures and its scope of operations.

Questions are raised concerning the Association's requirements that accredited schools be members of the American Association of Colleges of Osteopathic Medicine, and that D.O.'s who are members of the faculty of accredited colleges be members of the American Osteopathic Association. The Association and the Division of Eligibility and Agency Evaluation are directed to explore cooperatively the issues concerning the membership requirements and, at the end of one year, the Association is to submit to the Advisory Committee a report on its consideration of these issues.

During its meeting, the Committee reviewed additional written material submitted by Philip Pumerantz, Director of the AOA's

Office of Osteopathic Education. The Committee also heard an oral presentation by representatives of the Association.

#### American Physical Therapy Association, Committee on Accreditation in Education

1. March 23-26, 1976: *Petition for initial recognition for independent accreditation of entry level programs for physical therapist assistants.* Action on the petition is deferred for a period of two years. The American Physical Therapy Association currently is recognized by the Commissioner as a nationally recognized accrediting association in collaboration with the Council on Medical Education, American Medical Association. This petition constitutes a request for recognition outside the collaborative arrangement. The Advisory Committee has indicated a desire to encourage and preserve the concept of a coordinating agency for allied health accreditation. The Committee also recognizes recent efforts on the part of the CME to foster the adoption of revised physical therapist education *Essentials*, and to bring physical therapist assistant education under the CME "umbrella." The two-year deferral corresponds with the periods of recognition granted to the CME as the "umbrella" agency and for the CME and APTA as collaborating agencies for physical therapist education (please see the appropriate sections under the American Medical Association, above). During its meeting, the Advisory Committee heard oral presentations by the Association's representatives regarding both its petition for renewal of recognition as a collaborative agency, and this petition. From 1:10 to 1:25 p.m., Thursday, March 25, Subcommittee 1 of the Advisory Committee closed its discussions to the public, pursuant to Section 10(d) of the Federal Advisory Committee Act (P.L. 92-463) and clauses (4) and (6) of subsection (b) of section 552 of Title 5 of the United States Code. During this session, the subcommittee discussed financial and personnel matters associated with the American Physical Therapy Association and the Council on Medical Education. The subcommittee took no formal action and proposed no recommendations to the full Committee during the closed session.

2. December 8-10, 1976: *Petition for initial recognition for independent accreditation of entry level programs for physical therapists and programs for physical therapist assistants.* Consideration of this petition is deferred until the June 15-17, 1977, Advisory Committee meeting. As noted above, this petition, when first presented, was deferred for two years. However, since that action, the Association indicated that beginning January 1, 1977, it would sever its accrediting ties with the American Medical Association, and requested that the petition be reactivated. The request was granted. During the meeting, the Committee reviewed additional written material submitted by Richard Egan, Secretary, Council on Medical Education, American Medical Association; by William M. Samuels, Executive Director of the American Society of Allied Health Professions; by John W. Schermerhorn, Dean of the School of Allied Health Professions of the University of Texas Medical Center, and chairman of the Task Force on Accreditation of the Council on Educational Institutions, American Society of Allied Health Professions; and by J. Alexander McMahon, President of the American Hospital Association. Dr. Egan indicated a desire to continue to seek a collaborative approach to accreditation. Mr. Samuels expressed a willingness to cooperate with other organizations with similar concerns in accreditation. Dr. Schermerhorn urged deferral of any new action until all concerned parties could have an opportunity to explore mutual concerns. He also indicated that the American Society of Allied Health Professions would assume a more active role in accreditation. Dr. McMahon opposed the APTA's withdrawal from the collaborative arrangement as encouraging fragmentation in accreditation. Mr. Samuels and Drs. Egan and Schermerhorn also made oral presentations before the Committee, as did representatives of the APTA. The Association's representatives indicated a willingness to explore cooperative efforts with any organization in the future in order to insure proper training of physical therapists and to protect consumer interests. The Advisory Committee's recommendation, and the Commissioner's

action regarding this petition, therefore, are designed to provide an opportunity for the concerned parties to explore efforts toward improvement of cooperation. The interval also permits the Association to review concerns raised regarding its compliance with criteria (c)(1) (acceptance) and (c)(4) (reflects community of interests), of the Criteria for Recognition. In view of the change in the currently recognized collaborative arrangement for accreditation of physical therapist education, the Council on Medical Education is requested to present, at the June 15-17, 1977, Advisory Committee meeting, justification for its continued recognition as the accrediting agency in this area. Dr. Pascasio was absent from all discussion and action regarding this petition. Dr. Miller served as Advisory Committee Chairperson during the full Committee review of the petition.

#### **American Psychological Association, Committee on Accreditation**

June 16-18, 1976: *Interim report regarding the accreditation of doctoral programs in school psychology.* The report is accepted. The Committee on Accreditation has responded satisfactorily to previous concerns. During the meeting, the Advisory Committee heard an oral presentation by representatives of the Committee on Accreditation.

#### **American Speech and Hearing Association, Boards of Examiners in Speech Pathology and Audiology**

September 21-24, 1976: *Petition for renewal of recognition for accreditation of master's degree programs in speech pathology and audiology.* Recognition is continued for a period of three years. At the end of one year, the Boards will be expected to submit to the Advisory Committee a report demonstrating satisfactory compliance with criterion (b)(a)(i) (public representatives) of the Criteria for Recognition. In addition, the Boards'

report should indicate progress toward adoption of revised self-study guidelines and visiting team instructions—criterion (a)(3)(iii)(B) (guidance); adoption of written complaint review procedures—criterion (b)(2)(iv); and adoption of proposed new accreditation procedures. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Association.

## American Veterinary Medical Association

### 1. Committee on Animal Technician Activities and Training

December 8-10, 1976: *Petition for extension of scope of recognition to include the Committee on Animal Technician Activities and Training's (CATAT) accreditation of associate degree programs for animal technicians.* Extension of scope of recognition is granted for a period of one year. While CATAT has demonstrated satisfactory compliance with most of the Criteria for Recognition, three areas of deficiency in CATAT's compliance with the Criteria should be addressed if CATAT is to retain continued recognition beyond one year. These areas are: (a)(3)(iii) (self-analysis/on-site reviews), specifically, integration of the self-study document into the evaluative process; attention to the training and composition of site review teams; and (b)(2)(i) (public representatives). During its meeting, the Advisory Committee reviewed additional written material submitted by the Association, and heard an oral presentation by the Association's representatives. (The Association's Council on Education currently is recognized for accreditation, and for award of the preaccreditation status of "Reasonable Assurance of Accreditation," of programs leading to the D.V.M. and V.M.D. degrees.)

### 2. Council on Education

June 16-18, 1976: *Interim report.* The report is accepted. The Council has responded satisfactorily to previous concerns.

## Association for Clinical Pastoral Education, Inc.

June 16-18, 1976: *Petition for renewal of recognition for accreditation of professional training centers for clinical pastoral education.* Recognition is continued for a period of four years. The Association is commended for its progress, and is encouraged to continue its cooperative relationship with the Association of Theological Schools in the United States and Canada. During the meeting, the Advisory Committee heard an oral presentation by representatives of the Association.

## Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission

December 8-10, 1976: *Petition for renewal of recognition for accreditation and preaccreditation as "Correspondent" and "Candidate" of rabbinical and Talmudic schools.* Recognition is continued for a period of four years. The Accreditation Commission has demonstrated satisfactory compliance with the Criteria for Recognition. During the meeting, the Advisory Committee heard an oral presentation by representatives of the Commission.

## Association of Independent Colleges and Schools, Accrediting Commission

September 21-24, 1976: *Interim report.* The report is accepted. The Commission has responded satisfactorily to the Commissioner of Education's letter of April 24, 1975.

## Cosmetology Accrediting Commission

September 21-24, 1976: *Petition for renewal of recognition for accreditation of cosmetology schools and programs.* Recognition is continued for a period of one year. While the Commission has demonstrated substantial progress since its last review, compliance with significant portions of the Criteria for Recognition remains to be demonstrated. Therefore, should the

Commission present a petition for renewal of recognition after one year, it will be expected to demonstrate further positive progress in all areas of deficiency cited by the Commissioner of Education in his letter of December 11, 1975. During the meeting, the Advisory Committee reviewed additional written material submitted by Lauren R. Oldak and William W. Scott, Counsel for the National Hairdressers and Cosmetologists Association. They raised a number of concerns regarding the Commission's compliance with the Criteria. In addition, the Committee heard an oral presentation by representatives of the Commission.

#### **Council on Education for Public Health**

1. September 21-24, 1976: *Interim report.* The report is accepted. The Council has responded satisfactorily to the Commissioner of Education's letter of April 24, 1975. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Council.

2. December 8-10, 1976: *Request for postponement of review of petition for renewal of recognition from March 1977 to March 1978.* The request is denied. The Council requested the postponement because of preparations to expand its scope of accrediting activities. The Council indicated that it would seek recognition for this expanded scope, but that it would take approximately one year to prepare standards and procedures, and to submit a petition for recognition. In rejecting the Council's request, the Committee takes the same position which it took in denying the request of the American Library Association (please see above). (No action was required by the Commissioner; subsequently, DEAE, for administrative reasons, rescheduled the Council's review for June 1977.)

#### **Council on Social Work Education, Commission on Accreditation**

June 16-18, 1976: *Petition for renewal of recognition for accreditation, and for the award of the preaccreditation*

*status of "Candidacy," of master's and baccalaureate degree programs in social work.* Recognition is continued for a period of four years. At the end of one year, the Commission will be expected to submit a report to the Advisory Committee demonstrating progress toward achieving satisfactory compliance with criteria (b)(2)(ii)(C) (current status) and (b)(10) (accurate reference), of the Criteria for Recognition. During its meeting, the Committee heard an oral presentation by representatives of the Commission.

#### **Engineers' Council for Professional Development**

September 21-24, 1976: *Petition for renewal of recognition for accreditation of graduate programs leading to advanced entry into the engineering profession.* Recognition of the Council is continued for a period of two years. Continuation of recognition beyond two years will depend, among other factors, upon the results of the six-year experiment and study of this level of accreditation scheduled to be completed by ECPD, and upon the capability of ECPD to resolve, within its own structure, issues of conflict among its Participating Bodies and their members. During its meeting, the Advisory Committee reviewed additional written material submitted by the Council; by Bruno A. Boley, Dean of Technical Institute of Northwestern University, and Secretary to the Engineering Deans of the "Big Ten" Universities; and by Daniel C. Drucker, Dean of Engineering, University of Illinois, and Chairman of the Engineering College Council, American Society for Engineering Education. Dean Boley and Dean Drucker both opposed ECPD's accreditation of advanced level engineering programs. The Advisory Committee also heard oral presentations by the Council and by Dean Boley and Dean Drucker. Dean Irving abstained from discussion and voting on this petition.

#### **Foundation for Interior Design Education Research, Committee on Accreditation**

March 23-26, 1976: *Petition for initial recognition for accreditation of professional and technical interior design programs.*



Recognition is granted for a period of two years. The Committee on Accreditation has demonstrated compliance with the Criteria for Recognition. The two year period of recognition will enable the Advisory Committee to evaluate FIDER's full implementation of its evaluative procedures after a two-year period. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Committee on Accreditation.

#### **National Association of Schools and Colleges.**

December 8-10, 1976: *Petition for initial recognition for accreditation of programs, schools and colleges in the area of non-traditional or alternative education.* Recognition is denied. The Association has failed to demonstrate satisfactory compliance with a substantial number of the Criteria for Recognition. These are: (a)(1)(i) and (ii) (scope of operations); (a)(2)(i), (ii) and (iv) (organization); (a)(3)(i) (procedures); (b)(1)(ii) (definition of purpose); (b)(2)(i), (ii A-C), (iii) and (iv) (responsiveness to the public); (b)(3)(v) and (viii)(A) (due process); (b)(4) (ethical practices); (b)(5) (program of evaluation); (b)(6) (output evaluation); (c)(1), (2), (3) and (4) (reliability); and (d)(1) (autonomy). The Committee and the Commissioner further suggest that the Association can best achieve compliance through a basic change in its evaluative approach—namely, the evaluation of institutions on the basis of current programs, resources and objectives, rather than on future promise. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Association.

#### **National Association of Schools of Art, Commission on Accreditation and Membership**

March 23-26, 1976: *Petition for renewal of recognition for accreditation, and for the award of the preaccreditation status of "Candidacy Status," of professional art schools and programs.* Recognition is continued for a period of four years. The Commission has demonstrated satisfactory compliance with the Criteria

for Recognition. At the end of one year, the Commission will be expected to submit to the Advisory Committee a report on action taken, if any, regarding the inclusion of proprietary schools of art in the universe of schools and programs which it accredits, and on the results of the Commission's exploration into the development of a monitoring system which would ensure a review of schools and programs at intervals more frequent than the current ten-year cycle of reevaluations. During its meeting, the Committee heard an oral presentation by representatives of the Commission.

#### **National Association of Schools of Music**

June 16-18, 1976: *Petition for extension of scope of recognition to include accreditation of non-degree granting secondary and postsecondary institutions offering music education.* Extension of scope of recognition is granted until September 1977, when this activity can be reviewed in conjunction with the review of the Association's other accrediting activities. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Association.

#### **National Council for Accreditation of Teacher Education**

March 23-26, 1976: *Petition for renewal of recognition for accreditation of baccalaureate and graduate degree programs for teacher education.* Recognition is continued for a period of three years. The Council has demonstrated satisfactory compliance with most of the Criteria for Recognition. At the end of one year, the Council will be expected to submit to the Advisory Committee a report demonstrating progress toward satisfactory compliance with the following criteria: (b)(2)(i) (public representatives); (b)(2)(iv) (complaint review procedures), particularly, implementation of such procedures; and (b)(9) (regular reevaluations). During its meeting, the Committee heard an oral presentation by representatives of the Council.

### National Home Study Council, Accrediting Commission

1. March 23-26, 1976: *Petition for renewal of recognition for accreditation of private home study schools.* Recognition is continued for a period of three years. The Accrediting Commission has demonstrated satisfactory compliance with most of the Criteria for Recognition. However, the Committee remains concerned about the Commission's compliance with several of the criteria. Therefore, at the March 1977 meeting, the Commission will be expected to submit to the Committee a report concerning further progress in: (1) developing a revised Guide to Self-Evaluation (criterion (a)(3)(iii)—self-analysis); (2) providing additional information about the relationship of output evaluation to determinations of accredited status (criterion (b)(6)—output evaluation); and (3) attention to the matters of school sales personnel and evaluation of outputs. The Commission also is requested to give maximum attention to ethical practices in home study education, and to include in its March 1977 report information regarding the number of persons participating in home study education and the impact of home study education upon its participants.

2. March 23-26, 1976: *Petition for extension of scope of recognition to include accreditation of non-private home study schools.* Extension of scope of recognition is granted. The Accrediting Commission has demonstrated that its accrediting activities in this area are conducted in compliance with the Criteria for Recognition. The Commission's scope of recognition now is defined as "accreditation of home study schools."

During this meeting, the Advisory Committee heard an oral presentation by representatives of the Accrediting Commission.

### New England Association of Schools and Colleges

June 16-18, 1976: *Petition for recognition as a nationally recognized accrediting association for institutional accredita-*

*tion and preaccreditation in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island and Vermont.* Recognition as an association is granted for a period of four years, including continued recognition of the preaccreditation categories utilized by each of the four Commissions of the Association. Several questions are raised regarding the Association's, or its Commissions', compliance with the Criteria for Recognition. Because it is apparent that certain of these questions resulted from misunderstandings concerning interpretation of the Criteria, the DEAE staff is directed to review these questions with officials of the Association and to provide a report to the Committee no later than the December 1976 Advisory Committee meeting. Issues which should be explored relate to the following: (1) for the Association as a whole—criteria (b)(2)(ii)(D) (names of personnel) and (b)(5) (validity of standards); (2) for the Commission on Institutions of Higher Education—criterion (b)(10) (written statements requiring institutions to specify the levels for which they have been accredited); (3) for the Commission on Public Schools—criteria (b)(2)(iii) (notice of standards revision) and (c)(4) (reflects community of interests); and, (4) for the Commission on Vocational, Technical, Career Institutions—criteria (b)(2)(iii) (notice of standards revision), (b)(7) (encourages innovation), (b)(10) (accurate reference) and (c)(4) (reflects community of interests).

The Association is commended for its pioneering efforts in the continuing evolution of the accrediting process. Because of staffing and scheduling problems, the Division of Eligibility and Agency Evaluation delayed its report until the June 15-17, 1977, Advisory Committee meeting.

Preaccreditation categories for which recognition is continued are:

Commission on Independent Schools: *Recognition of Candidacy for Accreditation*

Commission on Institutions of Higher Education: *Candidate for Accreditation*

Commission on Public Schools: *Recognition of Candidacy for Accreditation*

Commission on Vocational, Technical, Career Institutions: *Candidate for Accreditation, Candidacy for Accreditation*

During its meeting, the Advisory Committee heard an oral presentation by representatives of the Association. Except to answer other Committee members' questions, Mr. Wilkie, who was President of the Association when it was reorganized, abstained from discussion and voting on this petition.

#### New York State Board of Regents

September 21-24, 1976: *Interim report*. The report is accepted. The Board of Regents has responded satisfactorily to the Commissioner of Education's letter of April 24, 1975. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Board.

#### North-Central Association of Colleges and Schools, Commission on Schools

1. September 21-24, 1976: *Petition for renewal of recognition for institutional accreditation of secondary schools in Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Missouri, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin and Wyoming*. Recognition is continued for a period of four years. At the end of two years, the Commission will be expected to submit to the Advisory Committee a report on action it has taken to address the Committee's concern for the Commission's lack of full compliance with criterion (c)(4) (reflects community of interests) of the Criteria for Recognition. Regarding this issue, the Commission appears to be excluding secondary and elementary school faculty members (as opposed to administrators) from membership on its policy and decision-making bodies.

2. September 21-24, 1976: *Petition for extension of scope of recognition to include institutional accreditation of optional and special function (secondary level) schools, and elementary schools, and for preaccreditation as "Candidacy."* Extension of scope of recognition to include accreditation of elementary schools, and for the award of the preaccreditation status of "Candidacy," is granted for a period of four years. The Commission is requested to address the same concern with respect to this activity which was raised during the review of its activities within its present scope of recognition (please see above). The Commissioner of Education considers the Commission's present scope of recognition to include the accreditation of secondary optional and special function schools.

During this meeting, the Advisory Committee reviewed additional written material submitted by the Commission, and heard an oral presentation by representatives of the Commission. Dr. Simpson abstained from voting on both petitions, due to a possible appearance of conflict of interest.

#### Northwest Association of Schools and Colleges, Commission on Colleges

December 8-10, 1976: *Petition for renewal of recognition for institutional accreditation and preaccreditation as "Candidate for Accreditation" in Alaska, Idaho, Montana, Nevada, Oregon, Utah and Washington*. Recognition is continued for a period of four years. The Commission has demonstrated satisfactory compliance with most of the Criteria for Recognition. Regarding those criteria where concerns have been raised, the Advisory Committee indicates satisfaction with the assurances given by the Commission's representatives during their oral presentation on December 9. Rather than limit the Commission's term of recognition, therefore, the Commissioner requests that a report be submitted to the Advisory Committee at the end of two years demonstrating that the Commission's assurances regarding the following criteria have been implemented: (a)(2)(iv) (qualified

personnel), (a)(3)(i) (definitions/procedures), (b)(2)(i) (public representatives), (b)(2)(ii)(D) (names of personnel), (b)(3)(viii) (appeals rules) and (b)(5) (validity of standards). Dr. Miller abstained from discussion and voting on this petition.

**Southern Association of Colleges and Schools, Commission on Occupational Education Institutions**

1. December 8-10, 1976: *Petition for renewal of recognition for accreditation and for preaccreditation as "Candidate for Accreditation" of postsecondary non-collegiate, non-degree granting institutions of occupational education in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas and Virginia.* Recognition is continued for a period of four years. The Commission has demonstrated satisfactory compliance with the Criteria for Recognition. At the end of one year, the Commission will be expected to submit to the Advisory Committee a report on the development of a cooperative program with other commissions of the Southern Association to deal with shared-time area vocational centers, which presently do not have access to accreditation.

2. December 8-10, 1976: *Petition for extension of scope of recognition to include the accreditation of proprietary institutions.* Extension of scope of recognition is granted for a period of four years. While the Commission is in satisfactory compliance with the Criteria for Recognition, the Advisory Committee has expressed concern about the impact of this activity upon other accrediting agencies operating in the field of proprietary education. The Commission, therefore, will be expected, at the end of one year, to submit to the Advisory Committee a report on implementation of liaison with accrediting agencies already active in the proprietary vocational education field.

During this meeting, the Advisory Committee heard an oral presentation by representatives of the Commission.

**Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges**

September 21-24, 1976: *Petition for renewal of recognition for institutional accreditation, and preaccreditation as "Candidate for Accreditation," of community and junior colleges in California, Hawaii, the Territory of Guam and such other areas in the Pacific Trust Territories as may apply to it for service.* Recognition is continued for a period of four years. The Commission is requested to review its compliance with criterion (b)(5) (validity of standards) of the Criteria for Recognition, and to consider the formalization of procedures to assess the validity and reliability of its educational standards. During its meeting, the Committee heard an oral presentation by representatives of the Accrediting Commission.

**Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities**

September 21-24, 1976: *Petition for renewal of recognition for institutional accreditation, and preaccreditation as "Candidate for Accreditation," of senior colleges and universities in California, Hawaii, the Territory of Guam and such other areas of the Pacific Trust Territories as may apply to it for service.* Recognition is continued for a period of four years. The Commission is requested, during its next review for renewal of recognition, to address the issue of its minimal compliance with criterion (c)(4) (reflects community of interests) of the Criteria for Recognition. Regarding this criterion, the imbalance between faculty and administration membership on the Commission appears to be inconsistent with the Commission's own policy statement regarding its composition. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Accrediting Commission.

**B. State Agencies Recognized for the Approval of Public Postsecondary Vocational Education**

**Arkansas State Board for Vocational Education**

December 8-10, 1976: *Interim Report*. The report is accepted. The Board has responded satisfactorily to previous concerns. During its meeting, the Committee reviewed additional written material submitted by the Board, and heard an oral presentation by representatives of the Board.

**Florida State Board of Education**

March 23-26, 1976: *Withdrawal from Commissioner's List of Recognized State Agencies*. In 1975, the Board notified the Committee and the Commissioner of its intention not to apply for renewed recognition when its term expired in March 1976. The Board, therefore, is removed from the list. No action was required by the Committee.

**Indiana State Board of Vocational and Technical Education**

September 21-24, 1976: *Petition for renewal of recognition*. Recognition is continued for a period of two years. At the end of one year, the Board will be expected to submit to the Advisory Committee a report demonstrating progress toward establishing satisfactory compliance with the following Criteria for Recognition: (b)(1)(iv) (output assessment); (b)(1)(vii) (review of standards), specifically, review of standards, policies and procedures which provide comprehensive institutional coverage necessary for institutional evaluation; (b)(1)(ix) (review of complaints); and (c)(i) (statement of ethical practices) and (ii) (review procedures), specifically, the establishment of written procedures for these criteria. During its meeting, the Committee heard an oral presentation by representatives of the Board.

**Iowa State Board of Public Instruction**

March 23-26, 1976: *Petition for renewal of recognition*. Recognition is continued for a period of four years. The Board has demonstrated satisfactory compliance with the Criteria for Recognition. Shortly after July 1, 1976, the Board is expected to submit to the Advisory Committee a report demonstrating satisfactory implementation of its newly adopted institutional self-assessment procedures. (Subsequently, the Division of Eligibility and Agency Evaluation postponed review of the report until June 1977. The postponement was the result of scheduling difficulties.)

**Kansas State Board of Education**

June 16-18, 1976: *Interim report*. The report is accepted. The Board has responded satisfactorily to previous concerns.

**Kentucky State Board of Education**

September 21-24, 1976: *Petition for renewal of recognition*. Recognition is continued for a period of three years. At the end of one year, the Board will be expected to submit to the Advisory Committee a report addressing the following concerns: the breadth of composition of membership on visiting evaluation teams—criterion (a)(3)(ii)(B) (onsite examinations and report) of the Criteria for Recognition; progress toward inclusion of student representatives on the State Advisory Council on Vocational Education—criterion (b)(1)(i) (advisory body); and evidence that the Board promotes a well-defined set of ethical standards governing transcripts—criterion (c)(i) (statement of ethical practices). In addressing the issue of composition of membership on site visit teams, the Board is expected to explore the feasibility of including employers and representatives of industry. During its meeting, the Committee heard an oral presentation by representatives of the Board.

### Minnesota State Board for Vocational-Technical Education

March 23-26, 1976: *Petition for renewal of recognition.* Recognition is continued for a period of three years. The Board has demonstrated satisfactory compliance with most of the Criteria for Recognition. At the end of one year, the Board is expected to submit to the Advisory Committee a report demonstrating how it plans to implement procedures for a comprehensive self-evaluation (criterion (a)(3)(ii)(A)—qualitative assessment); and demonstrating how it compiles a composite report of finding of the on-site review team (criterion (b)(2)(ii)—written report furnished). During its meeting, the Committee heard an oral presentation by representatives of the Board.

### Missouri State Board of Education

March 23-26, 1976: *Petition for renewal of recognition.* Recognition is continued for a period of three years. The Board has demonstrated satisfactory compliance with the Criteria for Recognition. The limitation on the period of recognition to three years is designed to place the Board in the regular cycle of review for State Agencies recognized for the approval of public postsecondary vocational education. During its meeting, the Advisory Committee heard an oral presentation by representatives of the Board.

### New Jersey State Board of Education

June 16-18, 1976: *Petition for initial recognition.* Recognition is granted for a period of two years. The Board has demonstrated potential compliance with the Criteria for Recognition, but parts of its program have not yet been implemented. At the end of the two-year period, a review of the implemented accreditation program will be conducted. During its meeting, the Committee reviewed additional written material submitted by the Board, and heard an oral presentation by representatives of the Board.

### New York State Board of Regents

December 8-10, 1976: *Petition for renewal of recognition.* Recognition is continued for a period of four years. The Board of Regents has demonstrated satisfactory compliance with the Criteria for Recognition. During its meeting, the Committee reviewed additional written material submitted by the Board, and heard an oral presentation by representatives of the Board.

### Oklahoma State Board of Vocational and Technical Education

June 1, 1976: *Commissioner's action regarding petition for initial recognition for approval of postsecondary vocational education programs and courses offered at area vocational technical schools which are not offered for college credit.* Recognition is granted for a period of one year. During its September 16-19, 1975, meeting, the Advisory Committee recommended that initial recognition be granted for a period of four years, contingent upon a favorable ruling by the Oklahoma State Supreme Court regarding the Board's legal authority to conduct approval activities. On November 12, 1975, the Commissioner of Education, in approving the Committee's other recommendations from that meeting, elected to delay action on this recommendation until he was notified of the Court's ruling. On May 4, 1976, the Court resolved a jurisdictional dispute between the Board and the Oklahoma State Regents for Higher Education by ruling that the Board is legally authorized to approve those programs and courses described above in italics. On June 1, 1976, the Commissioner responded to this ruling by granting recognition to the Board for approval of programs and courses within the scope defined by the Oklahoma State Supreme Court. The limitation to one year of recognition, rather than a full four years as recommended by the Advisory Committee, was based upon the Commissioner's determination that many of the Board's policies and procedures are still in the developmental stage, and that their implementation should be reviewed before a full term of recognition can be considered.

### Oklahoma State Regents for Higher Education

September 21-24, 1976: *Petition for initial recognition for approval of vocational education programs for which credit earned is applied toward a degree, diploma, or other post-secondary academic or collegiate award, or which are given at State Institutions comprising the Oklahoma State System of Higher Education.* Recognition is granted for a period of one year. The action is based upon the Regents' demonstration of satisfactory or potential compliance with the Criteria for Recognition. Should the Regents present a petition for renewal of recognition at the end of one year, they will be expected to direct attention to areas of the Criteria with which satisfactory compliance has not been demonstrated, or for which insufficient information was provided for a complete evaluation. These criteria are: (a)(1)(iii) (differentiation procedures); (b)(2)(i) (on-site visit discussions); (b)(2)(vi) (continues approval status), specifically, demonstration that the Regents' procedures provide for continuation of approval of status pending the disposition of an appeal; and (b)(2)(vii) (report of appeal body), specifically, demonstration that the Regents' procedures provide for a written decision of the appeal body. The definition of the Regents' scope of approval activities is based upon an Oklahoma State Supreme Court ruling resolving a jurisdictional dispute between the Regents and the Oklahoma State Board of Vocational and Technical Education. The Commissioner of Education currently recognizes the State Board for approval of postsecondary vocational education programs and courses offered at area vocational technical schools which are not offered for college credit. Dr. Simpson abstained from voting on this petition, due to a potential conflict of interest.

### South Dakota State Board of Vocational-Technical Education

March 23-26, 1976: *Interim report.* The report is accepted as submitted. The report does not indicate continued progress toward satisfactory implementation of the Board's approval

procedures. Therefore, should the Board submit a petition for renewal of recognition in March 1977, it is requested to give special attention to the inclusion of a further analysis and explanation of the implementation of its new evaluation procedures. (The Board subsequently notified the Division of Eligibility and Agency Evaluation that it does not intend to apply for continued recognition in March 1977.)

### Utah State Board for Vocational Education

June 16-18, 1976: *Petition for initial recognition.* Recognition is granted for a period of two years. At the end of one year, the Board will be expected to demonstrate progress toward satisfactory compliance with criteria (a)(3)(ii)(A) (qualitative assessment), (b)(1)(ii) (advisory body), (b)(1)(vii) (impartiality), (b)(1)(ix) (review of complaints) and (c)(1) (statement of ethical practices), of the Criteria for Recognition; and to demonstrate satisfactory implementation of its approval plan. During its meeting, the Committee heard an oral presentation by representatives of the Board.

### C. State Agencies Recognized for the Approval of Nurse Education

#### Montana State Board of Nursing

December 8-10, 1976: *Interim report.* The report is accepted. The Board has responded satisfactorily to previous concerns. During its meeting, the Advisory Committee heard a presentation by representatives of the Board.

**D. Request for the Award of Eligibility Status for Federal Funding Programs Based upon a Determination of Satisfactory Assurance that an Institution Will Meet Accrediting Standards within a Reasonable Period of Time, Pursuant to the Higher Education Act of 1965, as Amended, Section 1201(a)(5)(A)**

**Waycross Junior College, Waycross, Georgia**

June 16-18, 1976: Eligibility status for Federal funding programs is awarded, based upon the College's demonstration of satisfactory assurance that it will meet the accrediting standards of the Commission on Colleges, Southern Association of Colleges and Schools, within a reasonable period of time.

**E. Request for a Determination of Reasonable Assurance that an Institution Will Meet Accrediting Standards within a Stated Period of Time, Pursuant to the Public Health Service Act (42 U.S.C. 201)**

**School of Osteopathic Medicine, College of Medicine and Dentistry of New Jersey, Newark, New Jersey**

June 16-18, 1976: The Surgeon General of the United States is notified that the School of Osteopathic Medicine will meet the accrediting standards of the nationally recognized accrediting association for osteopathic medicine within the time period specified by Section 775(b)(1)(A) of the Act. This determination is based upon consultation with representatives of the American Osteopathic Association and an evaluation visit to the school. Because of a funding deadline, the Commissioner of Education acted favorably upon this Committee recommendation on June 25, 1976.

**F. Request by the Department of Defense for a Recommendation Concerning the Award of Degree Granting Status to the Community College of the Air Force**

December 8-10, 1976: Pursuant to the December 23, 1954, *Federal Policy Governing the Granting of Academic Degrees by Federal Agencies and Institutions*, and to current authorizing legislation (subsection (c) of 10 U.S.C. 9315), the Commissioner informs the Secretary of Health, Education, and Welfare that the Community College of the Air Force has met the criteria for the award of the Associate in Applied Sciences Degree. This determination is based upon the recommendation of the U.S. Office of Education Site Review Team which visited the College. The Commissioner further designates, pursuant to the 1954 Policy, the Commission on Colleges of the Southern Association of Colleges and Schools as the appropriate nationally recognized accrediting agency to which the College should apply for accreditation. During its meeting, the Advisory Committee reviewed material submitted by the College, the Report of the Site Review Team, and written statements by Roger W. Heyns, President of the American Council on Education, and Kenneth E. Young, President of the Council on Postsecondary Accreditation. Dr. Heyns and Dr. Young both suggested that the award of degree granting status be delayed in order to permit further exploration of the possibility of providing, from the private sector, all of the opportunities for expeditious completion of associate degree programs needed by Air Force personnel. The Committee heard oral presentations by Dr. Young, by Dr. Heyns, by representatives of the Community College of the Air Force, by representatives of the USOE Site Review Team and by David Taylor, Assistant Secretary of Defense for Manpower and Reserve Affairs.



## PART II

### COMMITTEE ACTIONS ON POLICY ISSUES

During 1976, the Advisory Committee on Accreditation and Institutional Eligibility reviewed a number of policy issues but, on the whole, devoted less time to policy than in previous years. The Committee made no formal recommendations requiring action by the Commissioner of Education, although it identified a number of areas needing study and clarification. Because of budgetary restrictions and staffing problems, the Committee was unable to conduct its usual policy meeting in 1976. The Committee's unavoidable priority for completing action on the review of petitions by accrediting and State approval agencies restricted the amount of time available for the review of policy. At the same time, the petition reviews, as usual, revealed areas where further review of policy would contribute to improved consistency in Committee actions, and would enhance the Committee members' grasp of complex accreditation and eligibility issues.

For example, in December, Committee members identified a need for developing a consistent policy regarding the granting of lengthy postponements of petition reviews. During each of their first three meetings, they cited a need for clarification of the Office of Education's interpretation of the "public representative" definition in the Criteria for Recognition. In the June and September meetings, Committee members expressed concern about the practice among some accrediting agencies of including association membership requirements as conditions for membership on the faculties of accredited schools. In addition to issues arising out of the review of petitions, other developments, such as the Department of Health, Education, and Welfare's statutory mandate to produce regulations governing all activities which affect the administration of HEW programs, are expected to require review by the Advisory Committee. During its September meeting, therefore, the Com-

mittee proposed a special policy meeting for the spring of 1977 in order to deal with the backlog of policy matters and to help familiarize new members with the issues which the Committee faces. In its December meeting, the Committee learned that its original proposal to include former Committee members in this session might have to be tabled due to the expense involved. At that meeting, the Committee scheduled its policy meeting for April or May of 1977.

The Advisory Committee meetings in 1976 provided a forum for discussions with non-Federal groups and individuals to a greater extent than in previous years. This was accomplished in two ways: the scheduling of special sessions during regular Advisory Committee business meetings, and the increased propensity of third-party groups and individuals to speak on behalf of, or in opposition to, petitions pending before the Committee. Third party presentations, such as those regarding the Community College of the Air Force, the Council on Medical Education, the American Physical Therapy Association and the American Bar Association, often tended to stimulate discussion of issues beyond the range of their immediate impact upon the petition under consideration.

On March 23, the Committee, together with the Office of Education, sponsored a workshop which included representatives from recognized accrediting and State approval agencies, Federal and State government officials, noted educators and accreditors and interested members of the general public. The purpose of the workshop was to elicit comment from persons outside the Federal government upon the following topics:

1. Proposed legislative amendments relative to accreditation and institutional eligibility;

2. Proposed revisions to the Criteria for Recognition of National Accrediting Agencies and State Agencies for the Approval of Public Postsecondary Vocational Education;
3. Policy considerations pertaining to the development of an appellate procedure for hearings on adverse decisions regarding recognition of accrediting and approval agencies;
4. Procedures for determination of satisfactory assurance of reasonable progress toward accreditation; and
5. The American Institutes for Research Project on consumer protection in postsecondary education.

The workshop developed no formal statements regarding these issues. However, John R. Proffitt, Director of the Division of Eligibility and Agency Evaluation, announced the establishment of a Task Force on Futuristic USOE Criteria for Recognition. Members of the Task Force are: Samuel P. Martin, M.D. (Chairperson), Executive Director of the Leonard Davis Institute in Philadelphia; Dr. Richard J. Bradley, Executive Director of the New England Association of Schools and Colleges; Dr. Frank G. Dickey, Executive Vice President of University Associates, Inc., in Washington, D.C.; Mrs. Carol R. Goldberg, Vice President and General Manager of the Boston Supermarket Division of the Stop and Shop Companies; Dr. Thurston E. Manning, Director of the Commission on Institutions of Higher Education, North Central Association of Colleges and Schools; Dr. Richard M. Millard, Director of Higher Education Services, Education Commission of the States; and C. H. William Ruhé, M.D., Senior Vice President for Scientific Affairs of the American Medical Association.

Following the March 23 workshop, the Committee appointed a subcommittee to study the proposed legislation and to develop language for consideration as an Advisory Committee resolution. Members of the subcommittee were the Honorable Lillian W. Burke (Chairperson), Dr. Donald R. McKinley and Ms. Vicki

Shell. Dr. John E. Barrows, Director of Institutional Studies at the University of Kentucky, served as consultant to the subcommittee, and Mr. Ronald S. Pugsley, Acting Chief of the Accrediting Agency Evaluation Branch of DEAE, provided the staff support. Upon recommendation of the subcommittee, the full Committee, on March 26, unanimously adopted a resolution supporting the eligibility provisions of Administration bill H.R. 11939.

During its September meeting, the Advisory Committee met informally on the evening of September 22 with representatives of the Council on Postsecondary Accreditation (COPA). The meeting was a culmination of efforts by the two bodies to consult together on issues of mutual concern, and contributed greatly to a reduction of the tension which had characterized the current relationship. Representing COPA were Dr. Dana B. Hamel, Chancellor of the Virginia Community College System and Chairman of the COPA Board; Dr. Lloyd H. Elliott, President of The George Washington University and member of the Executive Committee and former Chairman of the COPA Board; and Dr. Kenneth E. Young, President of COPA. Participants generally expressed the wish that this type of informal meeting be encouraged, and Dr. Hamel issued an open invitation to Chairperson Anne Pascasio to attend all COPA meetings, or to send a representative for the Advisory Committee, and Dr. Pascasio reciprocated the invitation.

The Committee's September meeting also included several sessions designed to give the members a stronger background for the conduct of Committee business. On September 21, DEAE conducted an orientation for newly appointed members to the Committee. In addition to the new members, the session was attended by the Committee's new Chairperson, Anne Pascasio, and the Committee's new subcommittee Chairpersons, Dr. Donald R. McKinley and Mrs. Emiko I. Kudo. On September 23, the Committee viewed an audio-visual presentation by Mr. John Kemp, Illinois State Chairperson of the Commission on Schools of the North Central Association of

Colleges and Schools. The presentation described the Commission's training program for visitation teams. On September 24, the Committee was briefed on the problems and functions of those units in the Division of Eligibility and Agency Evaluation which are responsible for determining institutional eligibility for participation in Federal funding programs. For this session, the Committee heard from Dr. Leslie W. Ross, Acting Chief of the Institutional Eligibility Branch; Mrs. Ruth W. Crowley, Chief of the Occupational School Eligibility Section; and Mr. Joseph M. Hardman, Chief of the College Eligibility Section.

In 1975, a Policy Review Subcommittee was established to make recommendations regarding the future role, organization and procedures of the Advisory Committee. Members of the subcommittee were Mr. Valleau Wilkie, Jr., Chairperson, Dean John F. X. Irving, Dr. Anne Pascasio and James P. Steele, M.D. During its March meeting, the Committee reviewed the Subcommittee's preliminary report. The report outlined a number of recommendations regarding nomination and appointment of Advisory Committee members; guidelines for subcommittee appointments and the use of consultants; procedures for the conduct of Advisory Committee meetings; and support for the "triad" concept of the Federal government, State agencies, and private sector bodies participating in the areas of evaluation, accreditation and eligibility. The Committee took no formal action on the report, but the Chairperson directed members to provide additional comments to DEAE. The report probably will be reviewed again at the Committee's spring 1977 policy meeting.

In June and September, the Committee reviewed actions by accrediting agencies relative to Western State University College of Law of Orange County, California. In 1975, the Committee had played a role in the efforts of Western State University to secure access to accreditation review. The Committee had proposed a policy expressing the right of institutions to have access to accreditation. The Committee had encouraged the

American Bar Association, the Accrediting Commission for Senior Colleges and Universities of the Western Association of Schools and Colleges, and the Office of Education to explore all possibilities regarding access to accreditation for Western State University and similar schools. The Committee had suggested that legislation might be needed to meet the eligibility needs of such schools. Eventually, the Accrediting Commission for Senior Colleges and Universities awarded the University accredited status. This action brought challenges from the American Bar Association and the Association of American Law Schools. While the Committee took no formal action in either meeting regarding this development, it continued to review the matter, and questioned officials of the affected organizations during reviews of their petitions. (During the discussion of this issue in the March meeting, Dr. George L. Grassmuck, Chairperson of the Committee until June 30, relinquished the Chair in order to participate more fully in the discussion. Mr. Thomas C. Bolton served as Chairperson for that session.)

In June, the Committee unanimously adopted a resolution congratulating retiring Commissioner of Education T. H. Bell on his performance in office. The Committee also commended the five retiring members (Mr. Thomas C. Bolton, Judge Lillian W. Burke, Dr. Leadie M. Clark, Dr. George L. Grassmuck and Dr. Walter D. Talbot). The Committee conferred an honorary title of "Senior Consultant" on former members of the Committee and former Commissioners of Education, and directed them to be placed on the DEAE mailing list in order to keep them informed about developments in the fields to which they had contributed so much.

In September, the Committee received an opinion from the Department's Office of the General Counsel regarding a long-standing issue: whether the Federal Aviation Administration could qualify for recognition as a nationally-recognized accrediting agency. It was General Counsel's opinion that the Office of

Education does not have the authority to recognize a Federal agency as a nationally recognized accrediting agency. Also, in September, the Committee reviewed and discussed implications of the California State Legislature's proposal to terminate the accrediting activities in California of the Western Association of Schools and Colleges. No action was required by the Committee.

Finally, on May 6, the Secretary of Health, Education, and Welfare approved a new Charter for the Committee and extended the existence of the Committee for two more years. The new Charter contains no substantive changes from the 1974 Charter, but it does include the most current cost estimates and several stylistic changes. The Charter is included in this report as Appendix I.

## THE SECRETARY OF HEALTH, EDUCATION, AND WELFARE

## CHARTER

## Accreditation and Institutional Eligibility Advisory Committee

**PURPOSE**

The Commissioner of Education is required by the Veteran's Readjustment Assistance Act of 1952 (P.L. 82-550) and subsequent legislation to publish a list of nationally recognized accrediting agencies or associations and to determine institutional eligibility for participation of educational institutions in Federal assistance programs based on accreditation by any such agency or an equivalent approval by a committee appointed by the Commissioner. Discharge of these responsibilities necessitates the advice and counsel of persons knowledgeable in the field of institutional eligibility and accreditation.

**AUTHORITY**

Public Law 82-550 and subsequent legislation, and Section 9(a)(2) of the Federal Advisory Committee Act (P.L. 92-463). This Committee is governed by provisions of Part D of the General Education Provisions Act (P.L. 91-230 as amended; 20 U.S.C. 1233 et seq.) and the Federal Advisory Committee Act (P.L. 92-463; 5 U.S.C. Appendix I) which set forth standards for the formation and use of advisory committees.

**FUNCTIONS**

The Committee shall be advisory to the Secretary of Health, Education, and Welfare and to the Commissioner of Education and shall perform specific functions as follows:

1. Review all current and future policies relating to the responsibility of the Commissioner for the recognition and designation of accrediting agencies and associations wishing to be designated as nationally recognized accrediting agencies and associations, and recommend desirable changes in criteria and procedures;
2. Review all current and future policies relating to the responsibility of the Commissioner for the recognition and listing of State agencies wishing to be designated as reliable authority as to the quality of public postsecondary vocational education, and of nurse education, and recommend desirable changes in criteria and procedures;
3. Review and advise the Commissioner of Education in the formation of all current and future policy relating to the matter of institutional eligibility;
4. Review the provisions of current legislation affecting Office of Education responsibility in the area of accreditation and institutional eligibility and suggest needed changes to the Commissioner of Education;
5. Develop and recommend to the Commissioner of Education criteria and procedures for the recognition and designation of accrediting agencies and associations in accordance with legislative provisions, Presidential directives, or interagency agreements;

6. Review and recommend to the Commissioner of Education for designation as nationally recognized accrediting agencies and associations of reliable authority all applicant accrediting agencies and associations which meet criteria established under (5) above;
7. Develop and recommend to the Commissioner of Education, criteria and procedures for the recognition, designation and listing of State agencies in accordance with statutory provisions, Executive Orders, or interagency agreements;
8. Review and recommend to the Commissioner of Education for designation as State agencies of reliable authority as to the quality of public postsecondary vocational education, and of nurse education, all applicant State agencies which meet criteria established under (7) above;
9. Develop, under the authority of the Vocational Education Act of 1963, as amended, and recommend for the approval of the Commissioner of Education, standards and criteria for specific categories of private vocational training institutions which have no alternative route by which to establish eligibility for Federal funding programs;
10. Develop, under the authority of the Higher Education Act of 1965, as amended, and recommend for the approval of the Commissioner of Education, standards and criteria for specific categories of institutions of higher education, for which there is no recognized accrediting agency or association, in order to establish eligibility for participation in the student loan programs authorized by Title IV-B thereof;
11. Maintain a continuous review of Office of Education administrative practice, procedures and judgments relating to accreditation and institutional eligibility and advise the Commissioner of needed changes;

12. Keep within its purview the accreditation and approval process as it develops in all levels of education;
13. Advise the Commissioner of Education concerning the relations of the Office with accrediting agencies or associations, or other approval bodies as the Commissioner may request;
14. Advise the Commissioner of Education, pursuant to the Bureau of the Budget (Office of Management and Budget) policy dated December 23, 1954, regarding the award of degree-granting status to Federal agencies and institutions;
15. Not later than March 31 of each year, make an annual report of its activities, findings and recommendations.

#### STRUCTURE

The Committee shall consist of fifteen members, including the Chairperson, who shall be invited by the Secretary to serve three-year terms subject to the continuation of the Committee. The Committee shall include persons knowledgeable of secondary and postsecondary education, representatives of the student/youth population, of professional associations, of State Departments of Education and of the general public.

Management and staff services shall be provided by the Director, Accreditation and Institutional Eligibility Staff, Bureau of Postsecondary Education, who shall serve as OE Delegate to the Committee.

#### MEETINGS

The Committee shall meet not less than twice each year at the call of the Chairperson with the advance approval of the

Commissioner of Education or his designee. The Commissioner or his designee shall approve the agenda for each meeting. Meetings shall be open to the public except as may be determined otherwise by the Secretary; public notice shall be made of all committee meetings.

Meetings shall be conducted, and reports of proceedings kept, as required by the Federal Advisory Committee Act (P.L. 92-463), by 20 USC 1233e (Section 446(b) of the General Education Provisions Act (P.L. 91-230)), and by applicable Department regulations.

#### COMPENSATION

Members of the Committee who are not full-time employees of the Government shall be entitled to receive compensation at a rate of \$100 per day plus per diem and travel expenses in accordance with Federal Travel Regulations.

#### ANNUAL COST ESTIMATES

Estimated annual cost for operating the Committee, including compensation and travel expenses, but excluding staff support is \$56,000. Estimate of annual person-years of staff support required is 3 at an annual cost of \$55,000.

#### REPORTS

The Committee shall, not later than March 31 of each year, make an annual report to the Congress which shall be submitted

with the Commissioner's Annual Report. The Committee's annual report shall also be transmitted to the Secretary through the Commissioner and the Assistant Secretary for Education. Copies of the Annual Report shall be sent to the Department Committee Management Officer, the Office of Education Committee Management Officer and the Office of Education Committee Delegate. The Annual Report shall contain as a minimum a list of members and their business addresses, the Committee's functions, a list of dates and places of meetings, and a summary of activities, findings and recommendations during the year.

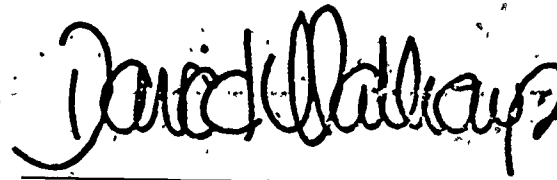
#### DURATION

The Accreditation and Institutional Eligibility Advisory Committee will terminate two years from the date of this Charter unless extension beyond that date is requested and approved by the Secretary.

APPROVED:

May 6, 1976

Date



Secretary

## PART 149—CRITERIA FOR RECOGNITION OF NATIONAL ACCREDITING BODIES AND STATE AGENCIES

Notice of proposed rulemaking with respect to criteria and procedures for recognition of Nationally Recognized Accrediting Agencies and Associations as reliable authorities concerning the quality of education or training offered by educational institutions of programs was published in the FEDERAL REGISTER on March 1, 1974 (39 FR 7946). Interested persons were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed rulemaking.

The notice of proposed rulemaking also indicated that the effectiveness of these criteria will be closely monitored during the first year of their implementation. Thereafter, no later than June 1975, the Commissioner of Education intends to propose such further revisions of these criteria as are appropriate in light of this review and other ongoing studies and reports dealing with accreditation and institutional eligibility.

Notice of proposed rulemaking with respect to criteria and procedures for recognition of State Postsecondary Vocational Education Agencies for accreditation of public postsecondary vocational institutions or programs was published in the FEDERAL REGISTER on November 30, 1973 (38 FR 33089). Interested parties were given 30 days in which to submit written comments, suggestions, or objections regarding the proposed rulemaking. No comments were received with respect to the criteria for recognition of State postsecondary vocational education agencies.

**A. Summary of Comments—Office of Education Response.** The following comments were received by the Office of Education regarding the proposed criteria and procedures for recognition of Nationally Recognized Accrediting Agen-

cies and Associations. After a summary of each comment, a response is set forth stating the reasons why no change is deemed necessary prior to field testing the criteria.

1. Section 149.1 *Scope—Comment.* A commenter suggested addition of a policy declaration regarding support by the Office of Education of voluntary accreditation. The same commenter suggested addition of a policy statement regarding State and local control over education.

*Response.* Policy declarations are not directly germane to regulations such as are set forth in the proposed revised Criteria. The Office still adheres to the policy regarding support of voluntary accreditation, however. The statement regarding State and local control over education is not relevant to the criteria inasmuch as these criteria pertain only to accrediting bodies and not to educational institutions.

2. Section 149.2 *Definitions—Comment.* A commenter suggested substitution of the word "educational" in place of "public" with reference to accreditation.

*Response.* Despite the fact that accreditation is conducted by private organizations, it is an activity which serves the public.

3. Section 149.5 *Initial recognition; renewal of recognition—Comments.* Two commenters suggested changing the review cycle from four to five, or six years.

*Response.* Comments received during the period of drafting the criteria recommended review periods ranging from two to ten years. In view of a lack of consensus on this matter, the U.S. Commissioner of Education's Advisory Committee on Accreditation and Institutional Eligibility recommended continuation of the four-year cycle at this time.

4. Section 149.6(a) *Functional aspects—Comments.* Specific comments

were received regarding three subsections of 149.6(a). The comments and responses follow:

*Comment.* One commenter sought deletion of the requirement to include on visiting teams at least one person who is not a member of the agency's policy or decision-making body or its administrative staff.

*Response.* This provision is retained in order to protect against conflict of interest situations, where policy, consulting, and decision-making functions are placed in the hands of a small group of individuals. It does not refer to the use of "lay" persons on visiting teams, but rather competent, knowledgeable peers who are not themselves directly involved in the final decision rendered by the accrediting body.

*Comment.* A commenter suggested addition of a requirement for self-study by accrediting agency staff.

*Response.* In the judgment of the Office of Education, agency self-study is clearly implicit in the process of preparing a petition for recognition or renewal of recognition.

*Comment.* A commenter said that there was need for increased specificity regarding the self-analysis requirement.

*Response.* Accrediting agencies reviewed by the Office cover the increasingly broad spectrum of postsecondary education. This criteria therefore touches only upon what the Office has determined from experience to be the essentials of the process. Variations in the self-analysis process, such as the inclusion of quantitative material and cooperation with other agencies, are left up to individual accrediting agencies.

5. Section 149.6(b) *Responsibility—Comments.* Several comments were received regarding various subsections of



149.6(b). The comments and responses follow:

*Comment.* Two commenters asked for the deletion of the requirement regarding inclusion of public representatives in the accreditation process.

*Response.* This provision is retained because, in protecting and advancing the interest of quality education, institutional and program accrediting serve the public interest. There is no reason to fear that by adding a more generalized point of reference, the accreditation process would be made any less insightful. The public component is a complement to the essential professional judgments made in the accreditation review, not a replacement for them.

*Comment.* Two commenters suggested deletion of the requirement that the current accreditation status and the date of next review be published.

*Response.* Inasmuch as accreditation serves a public function, the public, prospective students, and employers should be apprised of all institutions which have less than "fully approved" status.

*Comment.* One commenter suggested revision of the requirement regarding opportunity to comment on revised accreditation standards to provide for such activity to take place through "member institutions."

*Response.* Accreditation affects other elements of society than educational institutions. Comments from these other elements should flow directly to the accrediting agency without running the risk of dilution or misinterpretation by educational institutions.

*Comment.* One commenter called for the deletion of the provision for evaluations, other than initial ones, to be carried out without the invitation of the executive officer of the institution.

*Response.* This provision is retained because it permits accrediting agencies to investigate possible violations of their standards in a timely and effective manner.

*Comment.* One commenter suggested deletion of the requirement for foster-

ing of ethical practices, such as nondiscrimination and fair tuition refunds.

*Response.* Since the functions of accrediting agencies affect the public, the agencies should demonstrate responsibility in such areas as discrimination and financial responsibility.

*Comment.* One commenter suggested the addition of a requirement that accrediting agencies furnish the institution a list of proposed visiting team members and afford the institution the right to accept or reject an individual as a proposed examiner.

*Response.* This suggestion appears to have reasonable validity, and currently a number of accrediting agencies have such a policy. The Office wishes to consider further whether or not to add this requirement to the criteria.

After consideration of the above comments, Part 149 of Title 45 of the Code of Federal Regulations is amended to read as set forth below.

*Effective date.* Pursuant to section 431 (b) of the General Provisions Act (20 U.S.C. 1232(b)), these regulations become effective August 20, 1974.

Dated: August 15, 1974.

T. H. BELL,

U.S. Commissioner of Education.

Approved: August 16, 1974.

CASPAR W. WEINBERGER,  
Secretary of Health, Education,  
and Welfare.

#### PART 149—COMMISSIONER'S RECOGNITION PROCEDURES FOR NATIONAL ACCREDITING BODIES AND STATE AGENCIES

##### Subpart A—Criteria for Nationally Recognized Accrediting Agencies and Associations

- Sec.
- 149.1 Scope.
  - 149.2 Definitions.
  - 149.3 Publication of list.
  - 149.4 Inclusion on list.
  - 149.5 Initial recognition; renewal of recognition.
  - 149.6 Criteria.

**AUTHORITY:** (20 U.S.C. 403(b), 1085(b), 1141(a), 1248(11)); (42 U.S.C. 293a(b), 295f-3(b), 295h-4(1)(D), 298b(f)); (8 U.S.C. 1101(a)(15)(F)); (12 U.S.C. 1749c(b)); (38 U.S.C. 1775(a)).

##### Subpart B—Criteria for State Agencies

- Sec.
- 149.20 Scope.
  - 149.21 Publication of list.
  - 149.22 Inclusion on list.
  - 149.23 Initial recognition; reevaluation.
  - 149.24 Criteria.

**AUTHORITY:** Sec. 438(b) of the Higher Education Act of 1966, Pub. L. 89-329 as amended by Pub. L. 92-318, 86 Stat. 235, 264 (20 U.S.C. 1087-1(b)).

##### Subpart A—Criteria for Nationally Recognized Accrediting Agencies and Associations

###### § 149.1 Scope.

Accreditation of institutions or programs of institutions by agencies or associations nationally recognized by the U.S. Commissioner of Education is a prerequisite to the eligibility for Federal financial assistance of institutions and of the students attending such institutions under a wide variety of federally supported programs. The recognition of such agencies is reflected in lists published by the Commissioner in the FEDERAL REGISTER. Inclusion on such list is dependent upon the Commissioner's finding that any such recognized agency or association is reliable authority as to the quality of training offered. The Commissioner's recognition is granted and the agency or association is included on the list only when it meets the criteria established by the Commissioner and set forth in § 149.6 of this part.

###### § 149.2 Definitions.

"Accrediting" means the process whereby an agency or association grants public recognition to a school, institute, college, university, or specialized program of study which meets certain established qualifications and educational standards, as determined through initial and periodic evaluations. The essential purpose of the accreditation process is to provide a professional judgment as to the

quality of the educational institution or program(s) offered, and to encourage continual improvement thereof;

"Adverse accrediting action" means denial of accreditation or preaccreditation status, or the withdrawal of accreditation or preaccreditation status;

"Agency or association" means a corporation, association, or other legal entity or unit thereof which has the principal responsibility for carrying out the accrediting function;

"Institutional accreditation" applies to the total institution and signifies that the institution as a whole is achieving its educational objectives satisfactorily;

"Regional" means the conduct of institutional accreditation in three or more States;

"Representatives of the public" means representatives who are laymen in the sense that they are not educators in, or members of, the profession for which the students are being prepared, nor in any way are directly related to the institutions or programs being evaluated;

"States" includes the District of Columbia and territories and possessions of the United States.

(20 U.S.C. 1141(a))

#### § 149.3 Publication of list.

Periodically the U.S. Commissioner of Education will publish a list in the GENERAL REGISTER of the accrediting agencies and associations, which he determines to be reliable authorities as to the quality of training offered by educational institutions or programs, either in a geographical area or in a specialized field. The general scope of the recognition granted to each of the listed accrediting bodies will also be listed.

(20 U.S.C. 1141(a))

#### § 149.4 Inclusion on list.

Any accrediting agency or association which desires to be listed by the Commissioner as meeting the criteria set forth in § 149.6 should apply in writing to the Director, Accreditation and Institutional Eligibility Staff, Bureau of

Postsecondary Education, Office of Education, Washington, D.C. 20202.

#### § 149.5 Initial recognition, and renewal of recognition.

(a) For initial recognition and for renewal of recognition, the accrediting agency or association will furnish information establishing its compliance with the criteria set forth in § 149.6. This information may be supplemented by personal interviews or by review of the agency's facilities, records, personnel qualifications, and administrative management. Each agency listed will be reevaluated by the Commissioner at his discretion, but at least once every four years. No adverse decision will become final without affording opportunity for a hearing.

(b) In view of the criteria set forth in § 149.6, it is unlikely that more than one association or agency will qualify for recognition (1) in a defined geographical area of jurisdiction or (2) in a defined field of program specialization within secondary or postsecondary education. If two or more separate organizations in a defined field do seek recognition, they will both be expected to demonstrate need for their activities and show that they collaborate closely so that their accrediting activities do not unduly disrupt the affected institution or program.

(20 U.S.C. 1141(a))

#### § 149.6 Criteria.

In requesting designation by the U.S. Commissioner of Education as a nationally recognized accrediting agency or association, an accrediting agency or association must show:

(a) *Functional aspects.* Its functional aspects will be demonstrated by:

(1) Its scope of operations:

(i) The agency or association is national or regional in its scope of operations.

(ii) The agency or association clearly defines in its charter, by-laws or accrediting standards the scope of its

activities, including the geographical area and the types, and levels of institutions or programs covered.

(2) Its organization:

(i) The agency or association has the administrative personnel and procedures to carry out its operations in a timely and effective manner.

(ii) The agency or association defines its fiscal needs, manages its expenditures, and has adequate financial resources to carry out its operations, as shown by an externally audited financial statement.

(iii) The agency's or association's fees, if any, for the accreditation process do not exceed the reasonable cost of sustaining and improving the process.

(iv) The agency or association uses competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices: (A) to participate on visiting evaluation teams; (B) to engage in consultative services for the evaluation and accreditation process; and (C) to serve on policy and decision-making bodies.

(v) The agency or association includes on each visiting evaluation team at least one person who is not a member of its policy or decision-making body or its administrative staff.

(3) Its procedures:

(i) The agency or association maintains clear definitions of each level of accreditation status and has clearly written procedures for granting, denying, reaffirming, revoking, and reinstating such accredited statuses.

(ii) The agency or association, if it has developed a preaccreditation status, provides for the application of criteria and procedures that are related in an appropriate manner to those employed for accreditation.

(iii) The agency or association requires, as an integral part of its accrediting process, institutional or program self-analysis and an on-site review by a visiting team.

(A) The self-analysis shall be a qualitative assessment of the strengths and limitations of the institution or program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The agency or association provides written and consultative guidance to the institution or program and to the visiting team.

(b) *Responsibility.* Its responsibility will be demonstrated by the way in which—

(1) Its accreditation in the field in which it operates serves clearly identified needs, as follows:

(1) The agency's or association's accreditation program takes into account the rights, responsibilities, and interests of students, the general public, the academic, professional, or occupational fields involved, and institutions.

(1) The agency's or association's purposes and objectives are clearly defined in its charter, by-laws, or accrediting standards.

(2) It is responsive to the public interest, in that:

(1) The agency or association includes representatives of the public in its policy and decision-making bodies, or in an advisory or consultative capacity that assures attention by the policy and decision-making bodies.

(1) The agency or association publishes or otherwise makes publicly available:

(A) The standards by which institutions or programs are evaluated;

(B) The procedures utilized in arriving at decisions regarding the accreditation status of an institution or program;

(C) The current accreditation status of institutions or programs and the date of the next currently scheduled review or reconsideration of accreditation;

(D) The names and affiliations of members of its policy and decision-

making bodies, and the name(s) of its principal administrative personnel;

(E) A description of the ownership, control and type of legal organization of the agency or association.

(1) The agency or association provides advance notice of proposed or revised standards to all persons, institutions, and organizations significantly affected by its accrediting process, and provides such persons, institutions and organizations adequate opportunity to comment on such standards prior to their adoption.

(1) The agency or association has written procedures for the review of complaints pertaining to institutional or program quality, as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner that is fair and equitable to the complainant and to the institution or program.

(3) It assures due process in its accrediting procedures, as demonstrated in part by:

(1) Affording initial evaluation of the institutions or programs only when the chief executive officer of the institution applies for accreditation of the institution or any of its programs;

(1) Providing for adequate discussion during an on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(1) Furnishing, as a result of an evaluation visit, a written report to the institution or program commenting on areas of strengths, areas needing improvement and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(1) Providing the chief executive officer of the institution or program with an opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visit-

ing team before the accrediting agency or association takes action on the report;

(v) Evaluating, when appropriate, the report of the visiting team in the presence of a member of the team, preferably the chairman;

(vi) Providing for the withdrawal of accreditation only for cause, after review, or when the institution or program does not permit reevaluation, after due notice;

(vii) Providing the chief executive officer of the institution with a specific statement of reasons for any adverse accrediting action, and notice of the right to appeal such action;

(viii) Establishing and implementing published rules of procedure regarding appeals which will provide for:

(A) No change in the accreditation status of the institution or program pending disposition of an appeal;

(B) Right to a hearing before the appeal body;

(C) Supplying the chief executive officer of the institution with a written decision of the appeal body, including a statement of specifics.

(4) It has demonstrated capability and willingness to foster ethical practices among the institutions or programs which it accredits, including equitable student tuition refunds and nondiscriminatory practices in admissions and employment.

(5) It maintains a program of evaluation of its educational standards designed to assess their validity and reliability.

(6) It secures sufficient qualitative information regarding the institution or program which shows an on-going program evaluation of outputs consistent with the educational goals of the institution or program.

(7) It encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program.

(8) It accredits only those institutions or programs which meet its published standards, and demonstrates that its

standards, policies, and procedures are fairly applied and that its evaluations are conducted and decisions rendered under conditions that assure an impartial and objective judgment.

(9) It reevaluates at reasonable intervals institutions or programs which it has accredited.

(10) It requires that any reference to its accreditation of accredited institutions and programs clearly specifies the areas and levels for which accreditation has been received.

(c) *Reliability*. Its reliability is demonstrated by—

(1) Acceptance throughout the United States of its policies, evaluation methods, and decisions by educators, educational institutions, licensing bodies, practitioners, and employers;

(2) Regular review of its standards, policies and procedures, in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(3) Not less than two years' experience as an accrediting agency or association;

(4) Reflection in the composition of its policy and decisionmaking bodies of the community of interests directly affected by the scope of its accreditation.

(d) *Autonomous*: Its autonomy is demonstrated by evidence that—

(1) It performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational program or institution;

(2) It provides in its operating procedures against conflict of interest in the rendering of its judgments and decisions.

(20 U.S.C. 1141(a))

## Subpart B—Criteria for State Agencies

## § 149.20 Scope.

(a) Pursuant to section 438(b) of the Higher Education Act of 1965 as amended by Public Law 92-318, the United States Commissioner of Education is required to publish a list of State agencies which he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective States for the purpose of determining eligibility for Federal student assistance programs administered by the Office of Education.

(b) Approval by a State agency included on the list will provide an alternative means of satisfying statutory standards as to the quality of public postsecondary vocational education to be undertaken by students receiving assistance under such programs.

(20 U.S.C. 1087-1(b))

## § 149.21 Publication of list.

Periodically the U.S. Commissioner of Education will publish a list in the FEDERAL REGISTER of the State agencies which he determines to be reliable authorities as to the quality of public postsecondary vocational education in their respective States.

(20 U.S.C. 1087-1(b))

## § 149.22 Inclusion on list.

Any State agency which desires to be listed by the Commissioner as meeting the criteria set forth in § 149.24 should apply, in writing to the Director, Accreditation and Institutional Eligibility Staff, Bureau of Postsecondary Education, Office of Education, Washington, D.C. 20202.

(20 U.S.C. 1087-1(b))

## § 149.23 Initial recognition, and reevaluation.

For initial recognition and for renewal of recognition, the State agency will furnish information establishing its compliance with the criteria set forth in § 149.24. This information may be supplemented by personal interviews or by review of the agency's facilities, records, personnel qualifications, and administrative management. Each agency listed will be reevaluated by the Commissioner at his discretion, but at least once every four years. No adverse decision will become final without affording an opportunity for a hearing.

(20 U.S.C. 1087-1(b))

## § 149.24 Criteria for State agencies.

The following are the criteria which the Commissioner of Education will utilize in designating a State agency as a reliable authority to assess the quality of public postsecondary vocational education in its respective State.

(a) *Functional aspects.* The functional aspects of the State agency must be shown by:

(1) *Its scope of operations.* The agency:

(i) Is statewide in the scope of its operations and is legally authorized to approve public postsecondary vocational institutions or programs;

(ii) Clearly sets forth the scope of its objectives and activities, both as to kinds and levels of public postsecondary vocational institutions or programs covered, and the kinds of operations performed;

(iii) Delineates the process by which it differentiates among and approves programs of varying levels.

(2) *Its organization.* The State agency:

(i) Employs qualified personnel and uses sound procedures to carry out its operations in a timely and effective manner;

(ii) Receives adequate and timely financial support, as shown by its appropriations, to carry out its operations;

(iii) Selects competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices, (A) to participate on visiting teams, (B) to engage in consultative services for the evaluation and approval process, and (C) to serve on decision-making bodies.

(3) *Its procedures.* The State agency:

(i) Maintains clear definitions of approval status and has developed written procedures for granting, reaffirming, revoking, denying, and reinstating approval status;

(ii) Requires, as an integral part of the approval and reapproval process, institutional or program self-analysis and onsite reviews by visiting teams, and provides written and consultative guidance to institutions or programs and visiting teams.

(A) Self-analysis shall be a qualitative assessment of the strengths and limitations of the instructional program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body, and other appropriate constituencies.

(B) The visiting team, which includes qualified examiners other than agency staff, reviews instructional content, methods and resources, administrative management, student services, and facilities. It prepares written reports and recommendations for use by the State agency.

(iii) Reevaluates at reasonable and regularly scheduled intervals institutions or programs which it has approved.

(b) *Responsibility and reliability.* The responsibility and reliability of the State agency will be demonstrated by:

(1) Its responsiveness to the public interest. The State agency:

(i) Has an advisory body which provides for representation from public employment services and employers, employees, postsecondary vocational educators, students, and the general public, including minority groups. Among its functions, this structure provides counsel to the State agency relating to the development of standards, operating procedures and policy, and interprets the educational needs and manpower projections of the State's public postsecondary vocational education system.

(ii) Demonstrates that the advisory body makes a real and meaningful contribution to the approval process;

(iii) Provides advance public notice of proposed or revised standards or regulations through its regular channels of communications, supplemented, if necessary, with direct communication to inform interested members of the affected community. In addition, it provides such persons the opportunity to comment on the standards or regulations prior to their adoption;

(iv) Secures sufficient qualitative information regarding the applicant institution or program to enable the institution or program to demonstrate that it has an ongoing program of evaluation of outputs consistent with its educational goals;

(v) Encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program;

(vi) Demonstrates that it approves only those institutions or programs

which meet its published standards; that its standards, policies, and procedures are fairly applied; and that its evaluations are conducted and decisions are rendered under conditions that assure an impartial and objective judgment;

(vii) Regularly reviews its standards, policies and procedures in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance, and reflect the educational and training needs of the student;

(viii) Performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational institution or program;

(ix) Has written procedures for the review of complaints pertaining to institutional or program quality as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner fair and equitable to the complainant and to the institution or program;

(x) Annually makes available to the public (A) its policies for approval, (B) reports of its operations, and (C) list of institutions or programs which it has approved;

(xi) Requires each approved school or program to report on changes instituted to determine continued compliance with standards or regulations;

(xii) Confers regularly with counterpart agencies that have similar responsibilities in other and neighboring States about methods and techniques that may be used to meet those responsibilities.

(2) Its assurances that due process is accorded to institutions or programs seeking approval. The State agency:

(i) Provides for adequate discussion during the on-site visit between the visiting team and the faculty, administrative staff, students, and other appropriate persons;

(ii) Furnishes as a result of the evaluation visit, a written report to the institution or program commenting on areas of strength, areas needing improvement, and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;

(iii) Provides the chief executive officer of the institution or program with opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the agency takes action on the report;

(iv) Provides the chief executive officer of the institution with a specific statement of reasons for any adverse action, and notice of the right to appeal such action before an appeal body designated for that purpose;

(v) Publishes rules of procedure regarding appeals;

(vi) Continues the approval status of the institution or program pending disposition of an appeal;

(vii) Furnishes the chief executive officer of the institution or program with a written decision of the appeal body, including a statement of its reasons therefor.

(c) *Capacity to foster ethical practices.* The State agency must demonstrate its capability and willingness to foster ethical practices by showing that it:

(i) Promotes a well-defined set of ethical standards governing institutional or programmatic practices, including recruitment, advertising, transcripts, fair and equitable student tuition refunds, and student placement services;

(ii) Maintains appropriate review in relation to the ethical practices of each approved institution or program.

(20 U.S.C. 1087-1(b))

[FR Doc. 74-19298 Filed 8-19-74; 8:45 am]

## CRITERIA FOR RECOGNITION OF STATE AGENCIES FOR APPROVAL OF NURSE EDUCATION

For the purpose of determining eligibility for Federal assistance, pursuant to Public Law 88-581, as amended, the United States Commissioner of Education is required to publish a list of recognized accrediting bodies, and of State agencies, which he determines to be reliable authorities as to the quality of training offered by schools and programs for diploma, associate degree, and baccalaureate and graduate degrees in nursing. In pursuance of this mandate, the following criteria for recognition of State agencies were established and published in the January 16, 1969 *Federal Register*.

## CRITERIA

The following are the criteria which the Commissioner of Education will utilize in determining whether a State agency is reliable authority as to the quality of training offered by schools of nursing.

The State agency:

1. Is statewide in the scope of its operations and is legally authorized to accredit schools of nursing.
2. Makes publicly available:
  - a. Current information covering its criteria or standards for accreditation;
  - b. Reports of its operations;
  - c. Lists of schools of nursing which it has accredited.

3. Has an adequate organization and effective procedures, administered by a qualified board and staff, to maintain its operations on a professional basis. Among the factors to be considered in this connection are that the agency:
  - a. Uses experienced and qualified examiners to visit schools of nursing to examine educational objectives, to inspect courses, programs, administrative practices, services and facilities and to prepare written reports and recommendations for the use of the reviewing body—and causes such examinations to be conducted under conditions that assure an impartial and objective judgment;
  - b. Secures sufficient and pertinent data concerning the qualitative aspects of the school's educational program;
  - c. Requires each school of nursing accredited to follow clearly defined refund policies governing all fees and tuition paid by students;
  - d. Enforces a well defined set of standards regarding a school's ethical practices, including recruitment and advertising;
  - e. Requires each school of nursing accredited to submit a comprehensive annual report, including current data on:
    - (1) Progress toward achievement of its stated objectives in nursing education;

- (2) Qualifications and major responsibilities of the dean or director and of each faculty member;
- (3) Policies used for selection, promotion, and graduation of students;
- (4) Practices followed in safeguarding the health and well-being of students;
- (5) Current enrollment by class and student-teacher ratios;
- (6) Number of admissions to school per year for past 5 years;
- (7) Number of graduations from school per year for past 5 years;
- (8) Performance of students on State board examinations for past 5 years;
- (9) Curriculum plan;

(10) Brief course description;

(11) Descriptions of resources and facilities, clinical areas, and contractual arrangements which reflect upon the academic program.

f. Regularly, but at least every 2 years, obtains from each accredited school of nursing:

(1) A copy of its audited fiscal report, including a statement of income and expenditures;

(2) A current catalog.

g. Makes initial and periodic on-site inspections of each school of nursing accredited.

4. Has clear, written procedures for (a) the accreditation of a school of nursing or institution, (b) placing it on a probationary status, (c) revoking the accreditation, and (d) reinstating accreditation.



## FEDERAL POLICY GOVERNING THE GRANTING OF ACADEMIC DEGREES BY FEDERAL AGENCIES AND INSTITUTIONS

(Approved December 23, 1954: Letter from Director, Bureau of the Budget, to Secretary, Health, Education, and Welfare)

### Initial Assumptions

1. It is recognized and granted that Federal agencies may properly establish and operate personnel training programs as needed to improve the effectiveness of the performance of their assigned functions.

2. Because personnel of Federal agencies may need advanced education in order to develop specialized competencies of vital importance to the agencies concerned, each agency should be empowered and authorized, when necessary, to send personnel to institutions of higher education for such necessary preparation.

### Undergraduate Degree Programs

3. The pattern of undergraduate training is well established in certain of the existing educational institutions of the Federal Government, such as at West Point and Annapolis. Any new institution created by the Federal Government with authority to grant undergraduate degrees should, like the above mentioned institutions, be accredited by the appropriate accrediting agency if the bachelor's degree is to be granted. The Commissioner of Education should be assigned responsibility for determining the appropriate accrediting agency for each Federal installation that maintains an undergraduate degree program.

### Graduate Degree Programs

4. No Federal agency should be empowered to grant a graduate degree for any educational program, except where

the need for the authority to grant graduate degrees is established and there is a clear determination that the need for the graduate degrees cannot be adequately met by institutions set up under the authority of the various States, Territories, or the District of Columbia. Before any Federal agency is authorized to grant graduate degrees, there should be a thorough exploration, by the Department of Health, Education, and Welfare, of the possibility of having the program operated and/or the graduate degree granted through the facilities of existing educational institutions. For the purpose of such exploration, the services of the Department of Health, Education, and Welfare will be available, on request, to the agency concerned or to the Bureau of the Budget. In order to regularize the matter, each such request would be referred by this Department to the Commissioner of Education who, to assist him in reaching conclusions and making recommendations to the Secretary, would convene an impartial group of representative educators appointed by him, after consultation with the appropriate professional associations, to consider the relevant evidence and make recommendations to him in accordance with the procedure outlined below. This procedure could be formalized in an executive order or otherwise.

### Procedure

5. In order to give effect to the policies outlined above with respect to the authorization of Federal agencies to grant graduate degrees, the Commissioner of Education would be authorized and directed to establish a Review Committee to

advise him concerning recommendations to be made concerning any legislation that may be proposed which would authorize the granting of graduate degrees by Federal agencies.

6. It is proposed that the Review Committee consist of three continuing members, each to serve for a period of three years, plus six additional members to serve on an ad hoc basis—all to be appointed by the Commissioner of Education after consultation with the appropriate professional associations.

7. The principal functions of the Review Committee would be:

(a) to receive and review evidence submitted by the applying agency that the following criteria have been met:

- (1) that the conferring of the authority to grant the graduate degree in question is essential to the accomplishment of the program objectives of the applying agency.
- (2) that the graduate program in question and/or the graduate degrees proposed cannot be obtained on satisfactory terms through the facilities of existing non-Federal institutions of higher education.
- (3) that the graduate program conducted by the applying agency meets the standards for the degree or degrees in question which are met by similar pro-

grams in non-Federal institutions of higher education.

(4) that the administration of the graduate program concerned is such that the faculty and students be free to conduct their research activities as objectively, as freely, and in as unbiased a manner as that found in other non-Federal institutions of higher education. The existence of an advisory committee of educators from regularly-constituted institutions shall be regarded as some evidence of the safeguarding of freedom of inquiry. Accreditation by an appropriate accrediting body, if such exists, shall be regarded as another safeguard.

(b) on the basis of evidence obtained pertaining to the items listed under 7(a) above, to make a report, including its recommendations as to whether the power to grant graduate degrees should be authorized to the applying agency.

8. The Commissioner would, together with his own recommendations, transmit the report of the Review Committee to the Secretary of Health, Education, and Welfare. The Secretary would after consideration of the Commissioner's recommendations and the Review Committee's report, make recommendations to the requesting agency and the Bureau of the Budget, and transmit with such recommendations the report of the Review Committee.

## ADVISORY COMMITTEE MEETINGS CONDUCTED DURING 1976

**March 23-26, 1976** (Twenty-eighth Meeting)  
Arlington, Virginia

Open: March 23, Workshop: 1:15 p.m. to 5:00 p.m.  
 March 24, Full Committee: 9:15 a.m. to 11:15 a.m.  
 Subcommittee 1: 11:30 a.m. to 4:45 p.m.  
 Subcommittee 2: 11:30 a.m. to 4:45 p.m.  
 March 25, Full Committee: 9:10 a.m. to 10:30 a.m.  
 Subcommittee 1: 10:45 a.m. to 1:10 p.m.  
 1:25 p.m. to 3:45 p.m.  
 Subcommittee 2: 10:45 a.m. to 3:30 p.m.  
 Full Committee: 3:45 p.m. to 4:25 p.m.  
 March 26, Full Committee: 9:15 a.m. to 12:00 noon

Closed: March 25, Subcommittee 1: 1:10 p.m. to 1:25 p.m.

**June 16-18, 1976** (Twenty-ninth)  
Arlington, Virginia

All sessions open to the public

**September 21-24, 1976** (Thirtieth)  
Alexandria, Virginia

All sessions open to the public

**December 8-10, 1976** (Thirty-first)  
Arlington, Virginia

All sessions open to the public

## MEETINGS SCHEDULED FOR 1977

**March 23-25, 1977**  
Alexandria, Virginia

**April 28-29, 1977**  
Alexandria, Virginia

**June 15-17, 1977**  
Arlington, Virginia

**September 28-30, 1977**

**December 14-16, 1977**

**SCHEDULE FOR INITIAL EVALUATION AND REEVALUATION OF NATIONALLY  
RECOGNIZED ACCREDITING AGENCIES AND ASSOCIATIONS, STATE AGENCIES  
FOR APPROVAL OF PUBLIC POSTSECONDARY VOCATIONAL EDUCATION, AND  
STATE AGENCIES FOR APPROVAL OF NURSE EDUCATION**

Petitions and interim reports should be submitted three months prior to the scheduled review

June 1977

American Council on Education for Journalism, Accrediting Committee (interim)

American Dental Association, Commission on Accreditation of Dental and Dental Auxiliary Programs

American Medical Association, Council on Medical Education, as the coordinating agency in allied health education accreditation

Medical Assistant (interim)

Nuclear Medicine Technologist (interim)

Physical Therapist

American Physical Therapy Association, Committee on Accreditation in Education (initial)

Council on Education for Public Health Engineers' Council for Professional Development (for first professional degree programs in engineering and associate and baccalaureate degree programs in engineering technology)

Iowa State Board of Public Instruction (interim)

Kansas State Board of Education

September 1977

Minnesota State Board for Vocational-Technical Education (interim)

Montana Board of Public Instruction  
National Association of Schools of Art, Commission on Accreditation and Membership (interim)

National Council for Accreditation of Teacher Education (interim)

National Home Study Council, Accrediting Commission (interim)

American Assembly of Collegiate Schools of Business, Accreditation Council (interim)

American Library Association, Committee on Accreditation

American Osteopathic Association (interim)

American Podiatry Association, Council on Podiatry Education (interim)

Arkansas State Board for Vocational Education

Council on Social Work Education, Commission on Accreditation (interim)

National Association of Schools of Music

North Central Association of Colleges and Schools, Commission on Institutions of Higher Education

December 1977

Oklahoma State Board of Vocational  
and Technical Education  
Society of American Foresters  
Utah State Board for Vocational Ed-  
ucation (interim)

Accrediting Commission on Education  
for Health Services Administration  
American Association of Nurse Anes-  
thetists, Council on Accreditation  
(interim)

American Bar Association, Council of  
the Section of Legal Education and  
Admissions to the Bar

American Council on Pharmaceutical  
Education

American Speech and Hearing Asso-  
ciation, American Boards of Exam-  
iners in Speech Pathology and Au-  
diology (interim)

Cosmetology Accrediting Commission  
Indiana State Board of Vocational and  
Technical Education (interim)

Kentucky State Board of Education  
(interim)

Montana State Board of Nursing  
Oklahoma State Regents for Higher  
Education

March 1978

American Medical Association, Coun-  
cil on Medical Education, as the  
coordinating agency in allied health  
education accreditation

Assistant to the Primary Care  
Physician

Cytotechnologist

Histologic Technician

Laboratory Assistant

Medical Assistant

May 1978

Medical Laboratory Technician  
Medical Record Administrator  
Medical Record Technician  
Medical Technologist  
Nuclear Medicine Technologist  
Occupational Therapist  
Physical Therapist  
Radiologic Technologist  
Radiation Therapy Technologist  
Respiratory Therapist  
Respiratory Therapy Technician  
Specialist in Blood Bank Tech-  
nology  
Surgeon's Assistant

American Optometric Association,  
Council on Optometric Education  
(interim)

American Veterinary Medical Asso-  
ciation, Committee on Animal  
Technician Activities and Training

Middle States Association of Colleges  
and Secondary Schools, Commis-  
sion on Higher Education (interim)

National Accreditation Council for  
Agencies Serving the Blind and Vis-  
ually Handicapped (interim)

National Association of Trade and  
Technical Schools, Accrediting  
Commission

Southern Association of Colleges and  
Schools, Commission on Occupa-  
tional Education: Institutions  
(interim)

Foundation for Interior Design Educa-  
tion Research, Committee on Ac-  
creditation

September 1978

American Osteopathic Association  
American Podiatry Association, Council on Podiatry Education  
New Jersey State Board of Education  
Utah State Board for Vocational Education

December 1978

California Board of Registered Nursing  
Council on Chiropractic Education, Commission on Accreditation  
Engineers' Council for Professional Development (for graduate programs leading to advanced entry in the engineering profession)  
Indiana State Board of Vocational and Technical Education  
Iowa Board of Nursing  
Louisiana State Board of Nurse Examiners

Missouri State Board of Nursing  
New York State Board of Regents (Nursing Education Unit)  
North Central Association of Colleges and Schools, Commission on Schools (interim)  
Western Association of Schools and Colleges, Accrediting Commission for Schools

March 1979

American Psychological Association, Committee on Accreditation (for doctoral and internship programs in clinical and counseling psychology)  
American Veterinary Medical Association, Council on Education  
National Accreditation Council for Agencies Serving the Blind and Visually Handicapped (interim)

May 1979

September 1979

National League for Nursing, Inc.  
Board of Review for Associate Degree Programs  
Board of Review for Baccalaureate and Higher Degree Programs  
Board of Review for Diploma Programs  
Board of Review for Practical Nursing Programs  
New Hampshire Board of Nursing Education and Nurse Registration  
Northwest Association of Schools and Colleges, Commission on Colleges (interim)  
Southern Association of Colleges and Schools, Commission on Colleges  
West Virginia Board of Examiners for Registered Nurses

Association of Independent Colleges and Schools, Accrediting Commission  
Minnesota State Board for Vocational-Technical Education  
Missouri State Board of Education  
National Council for Accreditation of Teacher Education  
National Home Study Council, Accrediting Commission  
New York State Board of Regents (as a nationally recognized accrediting agency)

American Assembly of Collegiate Schools of Business, Accreditation Council

December 1979

American Association of Nurse Anesthetists, Council on Accreditation American Speech and Hearing Association, American Boards of Examiners in Speech Pathology and Audiology

Kentucky State Board of Education

March 1980

Middle States Association of Colleges and Secondary Schools, Commission on Higher Education

National Accreditation Council for Agencies Serving the Blind and Visually Handicapped

National Architectural Accrediting Board, Inc.

National Association for Practical Nurse Education and Service, Inc., Accrediting Review Board

May 1980

American Council on Education for Journalism, Accrediting Committee

Iowa State Board of Public Instruction  
National Association of Schools of Art,  
Commission on Accreditation and Membership

September 1980

Association for Clinical Pastoral Education, Inc.

Council on Social Work Education,  
Commission on Accreditation

New England Association of Schools and Colleges

Commission on Independent Schools

December 1980

Commission on Institutions of Higher Education

Commission on Public Schools

Commission on Vocational, Technical, Career Institutions

Accrediting Bureau of Medical Laboratory Schools

American Board of Funeral Service Education, Commission of Schools

North Central Association of Colleges and Schools, Commission on Schools

Western Association of Schools and Colleges, Accrediting Commission for Community and Junior Colleges

Western Association of Schools and Colleges, Accrediting Commission for Senior Colleges and Universities

March 1981

American Optometric Association, Council on Optometric Education

Association of Advanced Rabbinical and Talmudic Schools, Accreditation Commission

New York State Board of Regents (for public postsecondary vocational education)

Northwest Association of Schools and Colleges, Commission on Colleges

Southern Association of Colleges and Schools, Commission on Occupational Education Institutions

COMMITTEE ACTIONS ON PETITIONS, 1976

TYPE OF PETITION	TYPE OF ACTION TAKEN				
	Approved	Denied	Deferred	Accepted	No Action Required
<b>National Accrediting Agencies</b>					
Petitions for Initial Recognition	5	1	2	2	
Petitions for Renewal of Recognition	27	27			
Petitions for Extension of Scope	7	7			
Interim Reports			1		10
Requests for Deferral of Review of Petition	2	2			
<b>State Vocational Approval Agencies</b>					
Petitions for Initial Recognition*	4	4			
Petitions for Renewal of Recognition	6	6			
Interim Reports	3			3	
Withdrawal from Recognized List	1				1
<b>State Nurse Approval Agencies</b>					
Interim Report	1			1	
Requests for Satisfactory Assurance	2	2			
Petition for Degree Granting Authority	1	1			
<b>TOTALS</b>	<b>70</b>	<b>48</b>	<b>5</b>	<b>14</b>	

\*One of these was a Committee action (recommendation) in 1975; the Commissioner's action occurred in 1976



## COMMITTEE ACTIONS ON POLICY ISSUES, 1976

1. Proposed and scheduled policy review meeting for spring, 1977.
2. Conducted workshop with accrediting and State approval agencies, Federal and State officials, educators and the general public.
3. Reviewed proposed eligibility provisions of Administration bill HR 11939.
4. Adopted resolution supporting eligibility provisions of HR 11939.
5. Reviewed proposed revisions to Criteria for Recognition of National Accrediting Bodies and State Agencies for Approval of Public Postsecondary Vocational Education.
6. Reviewed American Institutes for Research project on consumer protection.
7. Conducted meeting with representatives of Council on Postsecondary Accreditation.
8. Reviewed visitation team training program of Commission on Schools, North Central Association of Colleges and Schools.
9. Reviewed report of Policy Review Subcommittee of the Advisory Committee.
10. Reviewed, twice, actions of accrediting agencies relative to Western State University College of Law of Orange County, California.
11. Adopted Resolution congratulating retiring U.S. Commissioner of Education T. H. Bell.
12. Reviewed HEW Office of the General Counsel opinion regarding the authority to designate Federal Aviation Administration as nationally recognized accrediting agency.
13. Reviewed California Legislature's actions directed toward Western Association of Schools and Colleges.

## WHO TO CALL OR WRITE

For information about accreditation and institutional eligibility  
For information about the Advisory Committee  
For submission of nominations for membership on the Advisory  
Committee  
For submission of petitions for recognition  
For inclusion on the DEAE mailing list

John R. Proffitt

Director

Division of Eligibility and Agency Evaluation  
Bureau of Higher and Continuing Education  
U.S. Office of Education  
Washington, D.C. 20202  
(202) 245-9875

For information about accreditation policy.  
For information about petitions for recognition

Ronald S. Pugsley

Acting Chief, Accrediting Agency Evaluation Branch  
Division of Eligibility and Agency Evaluation  
(Address as above)  
(202) 245-2810

For information about institutional eligibility  
For information about certifications for foreign students

Leslie W. Ross

Acting Chief, Institutional Eligibility Branch  
Division of Eligibility and Agency Evaluation  
(Address as above)  
(202) 245-2940

For information about eligibility of community, junior and senior  
colleges

Joseph M. Hardman

Chief, College Eligibility Section  
Institutional Eligibility Branch  
(Address as above)  
(202) 245-2943

For information about eligibility of vocational schools and  
programs

Ruth W. Crowley

Chief, Occupational School Eligibility Section  
Institutional Eligibility Branch  
(Address as above)  
(202) 245-9703