

U.S. Department of Education

**Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues**

RECOMMENDATION PAGE

1. **Agency:** Midwifery Education Accreditation Council (2001/2003)
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Petition for Continued Recognition
3. **Current Scope of Recognition:** The accreditation and pre-accreditation throughout the United States of direct-entry midwifery educational institutions and programs conferring degrees and certificates, including the accreditation of such programs offered via distance education.
4. **Requested Scope of Recognition:** Same as above.
5. **Date of Advisory Committee Meeting:** December, 2010
6. **Staff Recommendation:** Continue the agency's recognition and require the agency to submit a compliance report in 12 months that demonstrates the agency's compliance with the issues identified in this report.
7. **Issues or Problems:**
 - The agency must demonstrate that board members and ARC members are trained for reviews that include distance education and correspondence education. §602.15(a)(2)
 - The agency must demonstrate that its policies and procedures require its board to conduct its own analysis of the accreditation process materials (self-study, team report, institution/program response and any other appropriate information in rendering its decision and demonstrate that it is doing so). §602.17(e)
 - The agency needs to provide additional information and documentation demonstrating that it provides training to its board members and ARC members on distance education and correspondence education. §602.18(b)
 - The agency must provide evidence of a review process that includes criteria by which it will assess and determine that the teach-out plan provides for the equitable treatment of students and on what basis it determines, for example, that the teach out plans for notifications and additional charges are appropriate and reasonable. §602.24(c)(2)
 - The agency must demonstrate that it has a process for approving teach-out agreements between institutions. §602.24(c)(5)

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Midwifery Education Accreditation Council (MEAC) is both a programmatic and an institutional accreditor. It accredits direct-entry midwifery educational programs and institutions awarding degrees and certificates throughout the United States. MEAC accredits or pre-accredits two programs and eight institutions located in nine states. Four of the institutions have components offered via distance education or correspondence education.

The agency's accreditation enables its accredited, certificate and degree-conferring institutions to establish eligibility to participate in Federal programs administered by the Department of Education under the Higher Education Act (HEA) of 1965, as amended. Currently, three institutions accredited by MEAC participate in the HEA Title IV programs.

Recognition History

MEAC developed its accreditation standards and administrative policies and procedures in 1991 using a national consensus-building process with input from representative midwifery educators and schools. The agency began conducting its accreditation activities in 1993-94 and accredited its first institution in 1995. The National Advisory Committee on Institutional Quality and Integrity (NACIQI) considered MEAC for initial recognition at its Fall 2000 meeting and the Secretary's letter officially conferring recognition was sent to the agency in 2001. The agency was granted continued recognition for a period of five years in 2003.

The agency was again reviewed for continued recognition at the Fall 2007 meeting. At that time, the MEAC's recognition was deferred for one year and the agency was requested to provide a report to the Committee for review at the Spring 2009 meeting.

Due to the passage of HEOA, the NACIQI did not meet in Spring 2009. In January 2010, as a result of new regulations effective July 1, 2010, the agency was requested to submit a new petition for consideration at the Fall 2010 NACIQI meeting.

PART II: SUMMARY OF FINDINGS

§602.15 Administrative and fiscal responsibilities

The agency must have the administrative and fiscal capability to carry out its accreditation activities in light of its requested scope of recognition. The agency meets this requirement if the agency demonstrates that--

(a) The agency has--

(2) Competent and knowledgeable individuals, qualified by education and experience in their own right and trained by the agency on their responsibilities, as appropriate for their roles, regarding the agency's standards, policies, and procedures, to conduct its on-site evaluations, apply or establish its policies, and make its accrediting and preaccrediting decisions, including, if applicable to the agency's scope, their responsibilities regarding distance education and correspondence education;

The current MEAC board members' credentials demonstrate that they are well-qualified for their positions as board members. The agency has identified Board members with particular skill sets, such as distance education, that represent the current scope of the agency's recognition. Non-public members are midwives or midwifery educators. The two public members hold Ph.D.'s and are university faculty members. All board nominees must have the endorsement of two professional colleagues.

The agency currently maintains a list of 28 on-site evaluators, nine of whom also serve on the agency's board. Given the small number of schools/programs accredited by the agency, the size of the reviewer pool is adequate; the agency indicates that reviewers rarely participate in more than one site visit per year. Prospective reviewers must submit an application explaining their interest in serving, as well as their experience related to the review process, and provide two professional references. The agency has identified peer reviewers with particular skill sets, such as distance education, who can be drawn upon to conduct reviews that require their particular expertise.

The agency indicates that all Board members and Accreditation Review Committee members are trained on their roles and the agency's standards, policies, and procedures, including their responsibilities in distance and correspondence education and are required to participate in a training workshop, however, the agency provided no documentation of the workshop training. The Training Manual, provided, is a comprehensive self-paced training module but it does not address distance education or correspondence education. In addition, the agency provided no documentation that it monitors that reviewers completed the training.

Staff determination: The agency does not meet the requirements of this section. It must demonstrate that Board and ARC members are trained on their roles and the agency's standards, policies, and procedures, including their responsibilities in distance and correspondence education.

Analyst Remarks to Response:

As requested, the agency provided documentation regarding which site reviewers have completed training. However, the agency did not provide documentation to satisfy the previous concern regarding the training of site reviewers in distance education or correspondence education.

Staff determination: The agency does not meet the requirements of this section. It must demonstrate that board members and ARC members are trained for reviews that include distance education and correspondence education.

§602.17 Application of standards in reaching an accrediting decision.

The agency must have effective mechanisms for evaluating an institution's or program's compliance with the agency's standards before reaching a decision to accredit or preaccredit the institution or program. The agency meets this requirement if the agency demonstrates that it--

(e) Conducts its own analysis of the self-study and supporting documentation furnished by the institution or program, the report of the on-site review, the institution's or program's response to the report, and any other appropriate information from other sources to determine whether the institution or program complies with the agency's standards; and

According to the agency's petition and documentation, the Board is provided with the ARC's final report and ARC recommendation. The report is presented by the Board member who was on the ARC. Board minutes document the process. However, it is not clear that the Board is provided with and conducts its own analysis of all of the institution/program documents prior to rendering a decision as is required by the criterion. The agency needs to demonstrate that the board conducts its own analysis of the accreditation process materials (self-study, team report, institution/program response and any other appropriate information) in rendering its decision.

Staff determination: The agency does not meet the requirements of this section. It must demonstrate that its policies and procedures require its board to conduct its own analysis of the accreditation process materials (self-study, team report, institution/program response and any other appropriate information) in rendering its decision and demonstrate that it is doing so.

Analyst Remarks to Response:

The agency provided additional information and documentation regarding the board's review when making an accreditation decision. The board member who participated in the on-site review serves as a resource person during the board's discussions of an institution/program, and the entire board participates in the deliberations regarding the review materials. However, the agency did not sufficiently demonstrate that all board members have access to, and conduct their own analysis of, all documents provided by the institution and the site team related to the review.

Staff determination: The agency does not meet the requirements of this section. All board members must review all documents provided by the institution and site team prior to making accreditation decisions.

§602.18 Ensuring consistency in decision-making

The agency must consistently apply and enforce standards that respect the stated mission of the institution, including religious mission, and that ensure that the education or training offered by an institution or program, including any offered through distance education or correspondence education, is of sufficient quality to achieve its stated objective for the duration of any accreditation or preaccreditation period granted by the agency. The agency meets this requirement if the agency--

(b) Has effective controls against the inconsistent application of the agency's standards;

The agency demonstrates a number of effective controls against inconsistent application of its standards. For example, the agency's standards are clearly and specifically written; all institutions/programs receive the same published materials containing specific information about the agency's standards, policies, and processes; and the agency uses standardized reporting formats. Also, at least one board member participates in each on-site review, which also ensures a consistent approach to the application of the agency's standards and processes.

The agency also cites its training of all players in the process is an effective control for ensuring consistent application of the agency standards. Staff agrees that training is a fundamental control for ensuring consistency; however the agency has not provided sufficient evidence of effective training (cited in 602.15).

Staff determination: The agency does not meet the requirements of this section. It must demonstrate that it conducts training that provides an effective control against inconsistent application of its standards.

Analyst Remarks to Response:

Staff determination. The agency does not meet the requirements of this section. The agency needs to provide additional information and documentation demonstrating that it provides training to its board members and ARC members on distance education and correspondence education.

§602.24 Additional procedures certain institutional accreditors must have.

If the agency is an institutional accrediting agency and its accreditation or preaccreditation enables those institutions to obtain eligibility to participate in Title IV, HEA programs, the agency must demonstrate that it has established and uses all of the following procedures:

- (2) The agency must evaluate the teach-out plan to ensure it provides for the equitable treatment of students under criteria established by the agency, specifies additional charges, if any, and provides for notification to the students of any additional charges.**
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The agency's teach-out policy does not address the requirement that the agency is required to evaluate teach-out plans to ensure they provide for the equitable treatment of students. The agency has provided no evidence that it has procedures for the review and disposition of teach-out plans or that the agency has criteria by which it will conduct that review and determine that the teach-out plan provides for the equitable treatment of students and on what basis it determines, for example, that the teach out plans for providing student notification and applying additional charges to students are appropriate and reasonable.

Staff determination: The agency does not meet the requirement of this section. The agency must provide evidence of a review process that includes criteria by which it will assess and determine that the teach-out plan provides for the equitable treatment of students and on what basis it determines, for example, that the teach out plans for notifications and additional charges are appropriate and reasonable.

Analyst Remarks to Response:

Shortly before its response to the draft staff analysis was due, the agency requested further guidance on demonstrating compliance with this criterion. Department staff were unable to provide the requested guidance prior to the deadline set for the agency's response.

The agency is directed to the guidance in the staff analysis of the agency narrative to this criterion. An accrediting agency is expected to plan for situations that may occur with its accredited institutions in which a teach-out would be necessary to ensure that students are provided with every opportunity to complete their educational program. The agency is expected to have given advance consideration to and developed an approach (procedures) by which it will require a teach-out plan (to include identifying what information it will require from the institution and a timeline for its submission); a process for assessing the institution's plan to identify and assess the extent to which the institution's plan ensures that students are treated equitably, that the institution has a plan for notifying students of the situation and any additional charges they might expect in completing their educational program (i.e., for timeliness, clarity, appropriateness and reasonableness). The agency has an obligation under this section of the criteria to help ensure that all students, including those receiving federal student loans and grants, are afforded every support to complete their educational goals in situations of school closure, loss of accreditation, loss of authorization to operate, etc.

Staff determination: The agency does not meet the requirement of this section. The agency must provide evidence of a review process that includes criteria by which it will assess and determine that the teach-out plan provides for the equitable treatment of students and on what basis it determines, for example, that the teach out plans for notifications and additional charges are appropriate and reasonable.

- (5) The agency must require an institution it accredits or preaccredits that enters into a teach-out agreement, either on its own or at the request of the agency, with another institution to submit that teach-out agreement to the agency for approval. The agency may approve the teach-out agreement only if the agreement is between institutions that are accredited or preaccredited by a nationally recognized accrediting agency, is consistent with applicable standards and regulations, and provides for the equitable treatment of students by ensuring that--**

(i) The teach-out institution has the necessary experience, resources, and support services to--

(A) Provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations either entirely or at one of its locations; and

(B) Remain stable, carry out its mission, and meet all obligations to existing students; and

(ii) The teach-out institution demonstrates that it can provide students access to the program and services without requiring them to move or travel substantial distances and that it will provide students with information about additional charges, if any.

The agency provided its policies that include the requirement that institutions entering into teach out agreements must submit the agreement to the agency for approval. The agency has identified all of the requirements of this section of the criteria as required elements of the teach-out agreement. However, the agency has provided no information regarding the agency's review and approval process, such as what review indicators it will apply to ascertain the viability of the teach-out agreement to provide students with an alternative educational offering.

Staff determination: The agency does not meet the requirement of this section. The agency must provide evidence of a review and approval process, such as what review indicators it will apply to ascertain the viability of the teach-out agreement to provide students with an alternative educational offering.

Analyst Remarks to Response:

The agency has not substantiated the non-applicability of this criterion to its accreditation of its institutions. An accrediting agency is expected to plan for situations that may occur with its accredited institutions in which a teach-out would be necessary to ensure that students are provided with every opportunity to complete their educational program. The agency must require institutions that enter into teach-out agreements to submit those agreements to the agency for its review and approval. The agreement must be with an institution that has the necessary experience, resources, and support services to provide an education that is reasonably similar to the one at the institution that is closing and will be capable of remaining stable, carrying out its mission, and meeting its obligations to its students. The agency is expected to have a process and criteria for assessing the viability of the teach-out agreement. The agency is reminded that teach-out agreements would not be limited to other schools or programs that it accredits. In instances requiring teach-out agreements it could therefore be expected to review teachout agreements with similar schools accredited by other agencies and has an obligation to do so.

Staff determination: The agency does not meet the requirements of this section of the criteria. It must demonstrate that it has a process for approving teach-out agreements between institutions.

PART III: THIRD PARTY COMMENTS

The Department did not receive any written third-party comments regarding this agency.