

U.S. Department of Education

Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues

RECOMMENDATION PAGE

1. **Agency:** Montessori Accreditation Council For Teacher Education (1995/2003)
(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 of Montessori teacher education institutions and programs throughout the United States, including those 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 following items are discussed in the SUMMARY OF FINDINGS section:
 - The agency needs to document that the changes made to its procedures and standards provide for the effective evaluation of the quality of an institution's or program's distance education in the ten areas specified by the criteria. [§602.16(c)]
 - The agency needs to clarify and demonstrate its enforcement of its standards within the timeframes required by the criterion. [§602.20(a)]

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Montessori Accreditation Council for Teacher Education, Commission on Accreditation (MACTE) is a national programmatic and institutional accreditor. The agency currently has 68 freestanding institutions and 13 programs located throughout the United States.

The agency's recognition enables its institutions to establish eligibility to receive Federal student assistance funding under Title IV of the Higher Education Act of 1965, as amended (Title IV). The agency demonstrated that it serves as the Title IV gatekeeper for three of the institutions it accredits. Consequently, the agency must meet the Secretary's separate and independent requirements.

Recognition History

The Secretary of Education first recognized MACTE in 1995. Since that time, the Secretary periodically reviewed the agency and granted continued recognition. The last full review of the agency took place at the June 2008 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). Both the Department and the NACIQI recommended that the agency's recognition be renewed for a period of five years. The Secretary had not made a final decision prior to passage of the Higher Education Opportunity Act, which contained a number of provisions related to accrediting agency recognition that were effective upon enactment. Subsequently, new regulations were developed, effective July 1, 2010. As a consequence, the agency was required to submit an updated petition for review by staff and NACIQI.

MACTE requested in July 2009, in accordance with the requirements of the Higher Education Opportunity Act, that distance education be added to its scope of recognition. In its August 19, 2009 letter of response, the Department notified the agency that its request had been granted, and that MACTE's scope of recognition would be described as follows: The accreditation of Montessori teacher education institutions and programs throughout the United States, including those offered via distance education.

Department staff conducted an observation of the agency's decision-making meeting held in Racine, Wisconsin during May 2008.

The Department received no third-party comments in connection with the agency's current petition for continued recognition.

PART II: SUMMARY OF FINDINGS

§602.16 Accreditation and preaccreditation standards

(a) The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if–

(1) The agency's accreditation standards effectively address the quality of the institution or program in the following areas:

(b) If the agency only accredits programs and does not serve as an institutional accrediting agency for any of those programs, its accreditation standards must address the areas in paragraph (a)(1) of this section in terms of the type and level of the program rather than in terms of the institution.

(c) If the agency has or seeks to include within its scope of recognition the evaluation of the quality of institutions or programs offering distance education or correspondence education, the agency's standards must effectively address the quality of an institution's distance education or correspondence education in the areas identified in paragraph (a)(1) of this section. The agency is not required to have separate standards, procedures, or policies for the evaluation of distance education or correspondence education;

In accordance with the requirements of the Higher Education Opportunity Act, MACTE requested, and was granted, that distance education be added to its scope of recognition in 2009. Prior to, and consequent to that time, MACTE has been requiring that any distance education certification courses achieve the same outcomes, and be evaluated using the same standards and competencies, as on-site programs. Although the agency has not accredited any totally distance education programs, MACTE has had experience in evaluating hybrid or mixed programs that combine both on-site and distance methodologies. The agency has been conducting these evaluations in accordance with its distance education policy. The concise policy currently consists primarily of related definitions, as well as guidelines on the related materials that should be provided by the program in its self-study.

As a result of its experiences, MACTE is considering adopting a new essential standard on distance education. The proposed standard would primarily convert the current self-study guidelines into requirements. In addition, the new standard would require specific documentary materials that are to be provided by the program, as well as what MACTE expects its visiting teams to verify. (MACTE does emphasize interaction in the course design. However, MACTE should also make clear that the interaction between faculty and students must be “regular and substantive.”)

In the current sample visiting team report provided by the agency with its petition, the paucity of commentary provided by the team, in relation to the new focus of MACTE on distance education, was noteworthy. The fact that the distance education component of the hybrid program was by far the largest facet would make it all the more important for the MACTE accreditation commission to be as well-informed as possible regarding institutional effectiveness in the areas specified by the criteria. For just one example, how did MACTE evaluate the effectiveness of the student services while the distance education phase of the program was operational?

The Secretary's criteria require that an agency's accreditation standards effectively address the quality of the institution or program in several areas specified by the criteria. MACTE has failed to document that its evaluation teams and decision-makers are consistently evaluating the effectiveness of its standards when evaluating programs that are wholly or primarily conducted by distance education. Consequently, MACTE will need to document that its standards effectively address the quality of an institution's distance education in the ten specified areas.

Staff Determination:

The agency does not meet the requirements of this section of the criteria. The agency needs to document

that its standards effectively address the quality of an institution's distance education in the ten areas specified by the criteria.

Analyst Remarks to Response:

The draft staff analysis found that MACTE still needed to document that its standards effectively address the quality of an institution's distance education in the ten areas specified by the criteria. (The agency does not accredit correspondence education.)

Historically, MACTE has been requiring that any distance education components of a predominantly residential institution or program achieve the same outcomes, and be evaluated, using the same standards and competencies as the residential components. Although the agency had not accredited any totally distance education institution or program, MACTE did evaluate a hybrid or mixed program that combined a minor residential component with the majority of the education being provided via distance methodologies.

Unfortunately, the evaluation report for that review failed to demonstrate that MACTE applied its standards effectively in its evaluation of the distance education components. In particular, the brief and sometimes non-existent commentary submitted by the MACTE evaluators did not provide satisfactory evidence to allow the agency to be found in compliance with the requirements of this section.

Also, the agency originally reported that its written expectations regarding the evaluation of distance education were in a period of transition. The last distance education evaluation was conducted in accordance with the MACTE distance education policy. That concise policy currently consists primarily of related definitions, as well as guidelines on the materials that should be provided by the institution or program in its self-study. However, MACTE reported that it is considering adopting a new essential standard on distance education. The proposed standard would essentially convert the current self-study guidelines into requirements. In addition, the new standard would specify the documentary materials that are to be provided by the institution or program, as well as what MACTE expects visiting teams to specifically verify.

In response to a related criterion, MACTE reported on some significant steps it took to ensure that all on-site team reports (distance and/or residential) would consistently provide conclusive evidence to support the agency's effective application of its standards. First, MACTE revised the report template that is used by all evaluation teams to describe their findings while on-site. Now comments must be inserted by the team indicating in detail how each MACTE requirement is verified as being in compliance, partial compliance or non-compliance. In addition, the MACTE Handbook was revised to ensure that all on-site evaluation teams are informed regarding MACTE's expectations and requirements for constructing the team report. Furthermore, the MACTE training workshop presentation for visiting team members was revised to emphasize this major team responsibility. In particular, the revised training presentation now includes information on verification and assessment methods specifically targeted to distance education offerings.

Department staff finds that the changes made to the MACTE requirements for producing an evaluation report should solve most, if not all, of the previously noted issues. Although Department staff would welcome a new evaluation report that demonstrates MACTE compliance with its revised requirements, it is clear that MACTE rarely conducts an evaluation to an entity with a significant distance education requirement.

Nevertheless, since MACTE's evaluation of distance education is in transition and the agency is considering adopting a new standard on distance education, Department staff recommends that the agency submit a compliance report documenting the outcome of the current transition period. As well, there may be an opportunity for MACTE to conduct an evaluation of a distance education component sufficient to document the agency's revised practices and procedures relevant to distance education.

In summary, MACTE needs to document that its evaluation teams and decision-makers consistently evaluate the effectiveness of the agency's standards when reviewing programs offered in whole or in part via distance education.

Staff Determination:

The agency does not meet the requirements of this section of the criteria. The agency needs to document

that the changes made to its procedures and standards provide for the effective evaluation of the quality of an institution's or program's distance education in the ten areas specified by the criteria.

§602.20 Enforcement of standards

(a) If the agency's review of an institution or program under any standard indicates that the institution or program is not in compliance with that standard, the agency must--

- (1) Immediately initiate adverse action against the institution or program; or**
- (2) Require the institution or program to take appropriate action to bring itself into compliance with the agency's standards within a time period that must not exceed--**
 - (i) Twelve months, if the program, or the longest program offered by the institution, is less than one year in length;**
 - (ii) Eighteen months, if the program, or the longest program offered by the institution, is at least one year, but less than two years, in length; or**
 - (iii) Two years, if the program, or the longest program offered by the institution, is at least two years in length.**

This criterion requires that an agency either initiate immediate adverse action or allow an institution/program a timeframe to come into compliance with its requirements. The agency does have published enforcement policies, including the necessary timelines that are in conformity with the requirements of this criterion.

However, the documentation the agency provided does not clearly indicate what it is documenting, that is, whether it is an immediate action or an action after having allowed a timeframe for corrective action. The agency must provide additional clarity to this section, including additional documentation to demonstrate its effective application of enforcement timelines that comply with this section of the criteria.

Staff Determination:

The agency does not meet the requirements of this section of the criteria. The agency needs to provide additional clarity and documentation to demonstrate its effective application of enforcement timelines that comply with the specified requirements.

Analyst Remarks to Response:

The draft staff analysis found that MACTE still needed to provide documentation to demonstrate its effective application of enforcement timelines that comply with the specified requirements.

The agency's original submission only provided a letter denying initial accreditation to a school (Exhibit 8). No evidence was provided to show what MACTE does when it finds that a currently accredited school has failed to meet one or more of the agency's standards.

In response, MACTE submitted a letter (Exhibit 14) placing a school on accreditation with stipulations/probation for failing to meet specified MACTE standards. The school was officially notified in October 2010 that if the identified deficiencies were not corrected within a stipulated timeline (one year), then accreditation would be revoked (unless the period for achieving compliance is extended for good cause).

However, the letter also informs the school that if sufficient progress is not being made toward compliance, then a focused on-site evaluation team visit may be scheduled prior to taking further action regarding the accreditation status. It is unclear if the school must correct the deficiencies or simply show sufficient progress within the one year timeframe. It is also unclear if in one year the agency will revoke accreditation, or send a site team, if the deficiencies are not corrected.

Furthermore, the letter notes that the agency knew in April 2010 that the institution did not have satisfactory employment rates over the previous three-year period. It took the agency an additional six months to act on that information. In addition, if the agency decides in one year to send a site team before revoking accreditation, then the threatened enforcement action is even further postponed for an indefinite period of time. Because of these factors, the agency cannot be found in compliance with the requirements

of this section.

Staff Determination:

The agency does not meet the requirements of this section of the criteria. The agency needs to clarify and demonstrate its enforcement of its standards within the timeframes required by the criterion.

PART III: THIRD PARTY COMMENTS

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