



## **Policies and Procedures 2011-12**

### **Institutional Accreditation and Pre-accreditation**

#### **American Academy for Liberal Education**

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*This document is currently under revision to reflect a change in the recognition status of the Academy. At this time the Academy is not a Title IV accreditor for colleges within the United States.*

Additional copies of the information regarding membership may be secured from:

**The American Academy for Liberal Education**  
**127 S. Peyton Street, Suite 210**  
**Alexandria, VA 22314**

Or by going to the Academy's website: [www.aale.org](http://www.aale.org)

Information contained herein concerning programs, procedures, requirements, standards, and fees is subject to change without notice by the appropriate body of the Academy.

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ISSN

## TABLE OF CONTENTS

Adverse Decisions .....	2
Amendment of Academy Documents.....	2
Appeals of Adverse Decisions.....	2
Application Fees/Membership Dues.....	8
Appointment and Training of Evaluation Team Members.....	8
Articulation Agreements .....	8
Branch and Other Off-Campus Locations.....	9
Categories of Accreditation and Pre-accreditation .....	9
Change of Institutional Control.....	10
Complaints .....	11
Conflict of Interest in Accreditation.....	16
Consulting Service .....	17
Decisions of Other Accrediting and Authorizing Agencies .....	18
Deferral of Action .....	19
Disclosure of Accreditation Materials and Information .....	20
Disclosure of Membership Information .....	21
Evaluation Team Report Disclaimer .....	22
External Budget Control.....	22
Membership.....	22
Monitoring and Reevaluation of Accredited and Pre-accredited Institutions and Programs.....	23
Non-Discrimination Policy.....	25
Notification of Accreditation Decisions .....	26
Postponement of Evaluation Site Visits .....	27
Public Information.....	27
Public Members of the Board of Trustees.....	28
Reconsideration of Accreditation Actions.....	29
Records Retention .....	31
Review of New Financial Information on Appeal.....	31
Revocation of Accreditation or Pre-accreditation .....	33
Role of Accreditation Staff in Accreditation.....	33
Scope of Accreditation Authorization.....	34
Self-Assessment Procedures.....	34
Special Statuses .....	35
Statements of Membership.....	37
Student Complaints.....	39
Substantial Compliance .....	39
Substantive Change .....	39
Teach-out Agreements.....	42
Terms of Accreditation and Pre-accreditation.....	44
Third Party Comment .....	45
Withdrawal .....	45
Appendix (I)(a) Complaints.....	48
Appendix (I)(b) Complaints.....	50
Appendix (I)(c) Complaints.....	52

## **Adverse Decisions**

An adverse decision is defined as a decision of the Academy's Board of Trustees that *denies, withdraws, suspends, terminates or revokes* institutional accreditation, pre-accreditation or program accreditation. *Deferrals, probation, or tabled motions* by the Board of Trustees are *not* considered adverse actions.

## **Amendment of Academy Documents**

Changes to the Academy's *Standards and Criteria, Policies and Procedures*, and other documents are approved by the Board of Trustees during scheduled meetings. The Academy's Executive Committee may approve changes between meetings, at the request of the Academy President or Board Chairman.

## **Appeals of Adverse Decisions**

An appeal of an adverse decision by the Academy's Board of Trustees may be preceded, but not followed, by a request for reconsideration (see Adverse Decisions and Reconsideration of Accreditation Actions).

### *Grounds for Appeal*

The grounds on which an institution may appeal an adverse decision of the Academy's Board of Trustees denying or withdrawing institutional accreditation or pre-accreditation or program accreditation shall be:

1. that the Board's decision was not supported by substantial evidence in the record; or
2. that the Board, in making its decision, departed significantly from its written procedures and protocols.

### *Meaning of Appeals Decisions*

Decisions on appeals concern only matters outlined under "Grounds for Appeal" above. Decisions on appeals are made only on evidence available at the time of the decision being appealed.

### *Notice of Intent to Appeal*

1. An institution wishing to appeal a decision of the Academy's Board shall file with the President or Director of Accreditation a notice of intent to appeal by registered mail not later than thirty (30) days following the date of the decision letter of the Academy's Board. This notice shall be the official action of the governing board of the institution, and must be accompanied by the required filing fee.
2. Immediately upon receiving notice of intent to appeal, the Director of Accreditation shall forward to the President of AALE and the Chairman of the Academy's Board of Trustees a copy of the notice and shall acknowledge receipt of the notice in writing to the chief executive officer of the institution.

3. If the Director of Accreditation finds that the decision being appealed clearly is not one that denied or withdrew the accredited or pre-accredited membership of an institution or program with the Academy, the Director of Accreditation shall confirm to the institution or program its accredited or pre-accredited status with the Academy and shall notify the institution that the appeal is invalid and will not be entertained.

Failure of an institution to file notice of intent to appeal, the required filing fee, or its appeal document in a timely fashion shall void the appeal.

#### *Payment for Costs of the Appeal*

At the same time the notice of intent is sent, the institution shall send to the Academy by registered mail a deposit of \$7,500, payable to the Academy, to be deposited in the funds of the Academy and applied to certain costs of the appeals process as follows:

1. Travel and subsistence for members of the appeals committee;
2. Telephone and correspondence costs incurred by appeals committee members and reimbursed by the Academy;
3. Costs of meeting rooms for the appeals committee; and
4. Any other costs of conducting the appeals process paid by the funds of the Academy.

Such costs shall be totaled following the conclusion of the appeals process and divided equally between the institution filing the appeal and the Academy. The Director of Accreditation shall provide to both the institution and the Academy's Board an accounting of such costs and refund to the institution any portion of its \$7,500 deposit not used to pay the institution's portion of the costs. Appeal fees shall be subject to a yearly increase in accordance with the Higher Education Price Index.

The institution shall be responsible for any costs incurred in providing for its representatives at the appeals committee hearing and the preparation of its documents submitted as part of the appeals process, and such costs shall not be reimbursed by the Academy. Similarly, the Academy shall be responsible for any costs incurred in providing for its representatives at the appeals committee hearing and the preparation of its documents submitted as part of the appeals process.

Should the Director of Accreditation find that the institution did not provide its deposit against costs as delineated above, the Director of Accreditation shall notify the institution and the Chair of the Academy's Board of Trustees of that finding, and the appeal shall not be entertained.

#### *Filing of the Appeal Document*

The institution shall file with the Director of Accreditation by registered mail a written appeal document setting forth evidence and argument in support of its appeal not later than thirty (30) days following the date of its notice to appeal.

The evidence and argument of the written appeal document may set forth:

- a) that the Board's decision was not supported by substantial evidence in the record; or

- b) that the Board, in making its decision, departed significantly from its written procedures and protocols.

Changes made by or occurring at the institution since the time of the decision being appealed or evidence that is not submitted to the Academy prior to the time of the adverse decision that is the subject of the appeal may not be cited, or relied upon, in support of the appeal.

Any audio-visual or other supplementary materials that the institution may wish to provide in support of its case may accompany the appeal document.

Upon receipt of the written appeal document the Director of Accreditation shall forward to the President of the Academy and the Chair of the Board of Trustees a copy of the document and shall acknowledge receipt of the document in writing to the chief executive officer of the institution.

#### *Initial Response*

The Director of Accreditation shall ensure that the institution's notice of appeal and the appeal document meet all preconditions for review by the appeals committee. If the appeal is accepted for review, the Director of Accreditation informs the President of the Academy and the Chairman of the Academy's Board and provides the appeals materials submitted by the institution.

Within thirty (30) days of receipt of the appeals documents, the Chairman of the Academy's Board shall provide a written response to the appeal stating the reason for the Board's decision. The response shall be sent to the Director of Accreditation, who forwards a copy to the President of the Academy and the chief executive officer of the institution filing the appeal.

#### *Public Response to Inquiries*

The AALE appeals process operates under the *AALE Policies and Procedures* statement on Disclosure of Accreditation Materials and Information. AALE considers the appeals process to be confidential and, at all times during the course of the appeal, will maintain complete confidentiality of all documents and information supplied or reviewed during the appeal, as well as the deliberators and decision-making process relating to the appeal or to the decision under appeal. In response to inquiries concerning an institution appealing a decision of the Academy's Board, the Academy's comments will be limited to the following: confirm action that an appeal by the institution of an Academy decision is pending and that the status of the institution prior to the decision remains in effect pending the outcome of the appeal.

However, should a potential or actual appellant publicly disclose a pending or actual appeal or appeal decision, or publicly characterize or make misleading or inaccurate representations about the appeals process, the decision that may be, or is subject to, an appeal, or the appeals decision, whether before, during, or after the appeal, AALE reserves the right to respond immediately and publicly through the appropriate medium or media to correct or clarify such inaccurate or misleading representations or characterizations.

Statements regarding disclosure and confidentiality in the AALE Policies and Procedures Manual and above are consistent with AALE's responsibility under law and regulation to inform various governmental authorities when decisions are reached at the conclusion of accreditation or appeals procedures.

#### *Appointment of the Appeals Committee*

The Director of Accreditation (or designee), with the approval of the Executive Committee of the Academy's Board of Trustees, shall appoint the chairman and members of an appeals committee comprising three persons, none of whom shall be members of the Academy's Board of Trustees.

Each person invited to participate in the appeals committee shall be asked to consider whether any conflict of interest would arise from service on the committee. Conflict of interest includes, but is not limited to, participating in any way in the process leading to the decision being appealed or having any prior or projected alumni, employment, financial, or other relationship with the appealing institution that could influence or be construed as influencing the outcome of the appeal. If conflict of interest is found, that person may not serve on the appeals committee. In addition, Appeals Panel members are subject to the AALE Conflict of Interest in Accreditation policy (see Conflict of Interest in Accreditation).

The appeals committee shall receive from the institution making the appeal written materials detailing its appeal and from the Chairman of the Academy's Board a written response to the appeal.

#### *Appeal Hearing*

Upon receiving the written notice of intent to appeal, the Director of Accreditation shall establish the appeals committee, as provided above. After consultation with members of the committee, the Director of Accreditation shall notify the chief executive officer of the institution, the President of the Academy and the Chairman of the Academy's Board of a time and place at which the committee will hear the appeal.

The hearing shall be scheduled not earlier than sixty (60) days and not later than ninety (90) days following receipt by the Director of Accreditation of the notice of intent to appeal. The place of the hearing shall be within the continental United States. Once scheduled, the time and place of the hearing may be changed only by agreement of a majority of the appeals committee. The reason for such change shall be conditions beyond the control of the committee, institution, or Academy, such as weather or illness of representatives or appeals committee members.

The appeals committee shall conduct the hearing and its deliberations on the date and at the place scheduled. If for any reason the institution or the Academy does not have representatives present at the hearing, the hearing shall proceed, and the committee shall make its decision on the basis of the written record and the presentations available to it at the hearing.

An institution may elect to have its appeal considered by use of the written documents only, notifying the committee in writing of this election no later than forty-eight (48) hours in advance of the meeting. In this case, the committee shall not receive oral

presentations at the hearing from Academy representatives. The institution has the right to counsel and a presentation before the appeals panel.

### *Procedures for the Hearing*

Three groups are involved in the hearing:

1. The appeals committee;
2. Representatives from the appealing institution; and
3. Representatives from the Academy.

The institution may be represented by not more than three persons at the hearing, and the Academy may be represented by not more than three persons, one of whom shall be the Chairman of the Board of Trustees or the designee of the Chairman (but not the Director of Accreditation). Argument will be limited to principals, or their designees, with evidence provided by the other representatives. The Director of Accreditation shall act as staff to the committee.

After the committee is assembled and called to order by its chairman, the committee shall first meet by itself to consider the appeal document and the Academy response.

The committee shall then invite institutional and Academy representatives to enter the meeting together and shall ask for oral presentations and discussion of issues bearing on the appeal; this portion of the hearing may be recorded if the committee, institution, or Academy requests it and there is no objection. The presentations and discussion shall be allotted such times as the chairman of the committee shall decide. The chairman of the committee may terminate presentations and discussion found by the chairman to be of excessive length or not germane to the issues before the committee. Only issues discussed in the appeal document can be raised at the hearing by the institution and the Academy.

Following presentations and discussion, which may include questions from members of the committee, all representatives shall be excused from the hearing and the committee shall proceed to a deliberation and discussion of findings. If in the course of its discussion the committee wishes to recall representatives to answer questions, it may do so provided it recalls representatives of both the institution and the Academy.

### *Recommendation of the Committee*

The committee shall affirm, amend, reverse or remand the adverse decision:

The committee shall support its decision by specific findings of fact on which its recommendation is based.

### *Written Report of the Appeals Committee*

When the committee is ready to consider its written report, it shall meet with the Director of Accreditation and give instructions for the preparation of a draft report. Alternatively, the appeals committee may prepare the first draft of its own report. The staff shall formally and promptly circulate the draft report to each member of the committee for changes.

When a draft report and committee decision are approved by a majority of the committee, the staff shall prepare the final report containing the committee's findings and decision for the signature of the chairman of the appeals committee. A copy of the signed report

shall be sent promptly by staff to the chief executive officer of the institution, the President of AALE, the Chairman of the Academy's Board, and each member of the appeals committee.

*Final Decision of the Appeals Committee*

The decision of the appeals committee will be communicated in writing to the institution filing the appeal, as well as to the President and Chairman of the Board of Trustees of the Academy, within fifteen (15) days of the conclusion of the appeals hearing.

In the event the appeals committee upholds the original decision of the Academy's Board of Trustees, the Board's decision becomes final at this point.

In the event the appeals committee remands the original decision of the Academy's Board of Trustees, the prior status of the institution remains in effect until the Board of Trustees acts on the remanded decision.

*Action by the Board following an Appeals Decision*

If the appeal is denied, the Academy's Board of Trustees has no power to consider new evidence produced since the original decision.

If the appeal is sustained and the decision remanded to the Academy's Board, the Board in acting on the remanded decision shall take into account changes made by or occurring in the institution since the original decision. The Board in its reconsideration shall utilize written materials submitted by the institution, and may, at its discretion, utilize a team visit to the institution and other such procedures as are appropriate in correcting the errors and omissions identified by the appeals committee and in reaching a new decision on the institution's accreditation or pre-accreditation.

The institution may be assessed such fees as are established by the Academy for such procedures, except that the institution may not be assessed fees for Academy actions taken solely to correct errors and omissions identified by the appeals committee.

*Effective Date of Action*

Until the final decision of the appeals committee, the decision under appeal shall not be in effect, and the accredited or pre-accredited membership status of the institution or program shall remain as it was before the decision under appeal was made.

If the appeal is denied, the Academy decision under appeal shall become effective on the date of adoption by the appeals committee of the recommendation that the appeal be denied and the decision be sustained.

If the appeal is sustained, the decision being appealed is suspended until the Academy takes action on remand, and the accredited or pre-accredited membership status of the institution or program shall remain as it was before the decision under appeal was made.

No member of the Academy's Council of Scholars, will have a role in any appeal proceedings.

### **Applicant fees and membership dues**

Membership in the Academy is a *voluntary process*. Applicants and members pay fees and annual dues for the services that the Academy provides. A list of the current fees and dues can be obtained through the Academy's offices or its website. Concerned parties should contact the national office to obtain the most up-to-date fees and dues.

### **Appointment and Training of Evaluation Team Members**

The Academy shall provide applicant institutions or programs in advance with the names, titles, and institutional affiliations of each proposed candidate for the evaluation team. The applicant institution or program shall have ten (10) days for comment regarding conflicts of interest or documented bias before team members shall be invited to serve. When subsequent changes in the team have to be made, the institution is consulted and given five (5) working days to comment on the proposed changes. Site evaluation teams shall have at least one member whose primary position is in higher education administration (e.g., President, Vice-President, Provost, etc.) and at least one current academic (fifty percent or more of professional time is spent as a researcher or faculty member).

Because individuals with the power of appointment or invitation to an evaluation team cannot know of every possible conflict of interest, evaluators are expected to refuse a team invitation if any conflict appears probable (see Conflict of Interest). Applicant institutions or programs are also expected to comment on any possible conflicts of interest among proposed candidates for evaluation teams.

All site visitors are trained in applying the Academy's *Standards and Criteria*. In addition, they receive training in the use of the *AALE Site Visit Manual*. Training is conducted by AALE staff prior to the beginning of all site visits through a webinar, conference call and in person, and is supplemented as needed by training sessions at AALE national, regional or other scheduled meetings. Further, an Academy executive staff member accompanies all teams and is available throughout the site visit as a resource to team members.

### **Articulation Agreements**

The Academy requires that accredited and pre-accredited institutions submit for review curriculum and degree program articulation agreements with other institutions. Articulation agreements must be made only with institutions that are accredited or pre-accredited by agencies recognized by the U. S. Department of Education, and must be consistent with applicable Academy standards and regulations.

## **Branch and Other Off-Campus Locations**

The Academy's measures of accreditation apply to all locations of an institution, including branch campuses and off-campus programs. The Academy requires accredited and pre-accredited institutions to:

1. Notify the Academy of plans to establish any branch campus as least sixty (60) days in advance;
2. Submit at least sixty (60) days prior to the establishment of the branch campus a comprehensive business plan that includes:
  - a. Descriptions of curriculum, faculty and educational programs to be offered;
  - b. Projections for revenues, expenditures, and cash flow of the branch campus; and
  - c. Descriptions of the operation, management, and physical resources of the branch campus;
3. Receive an Academy site visit of any new branch campuses no later than six (6) months after the establishment of the branch campus.

The purpose of these visits is to ensure that educational quality is maintained at those additional locations. The Academy may also visit the main campus if deemed appropriate. The Academy does not allow for a pre-approval process that would not necessitate the above requirements.

## **Categories of Accreditation and Pre-accreditation**

### *Institutional Pre-accreditation*

An institution may apply for institutional pre-accreditation if:

1. The institution has been in continuous operation for fewer than ten (10) years and/or has never been accredited or pre-accredited by a U.S. Department of Education recognized institutional accreditor (AALE, NEASC, MSACS, SACS, NCACS, NWAS, WASC, or other) regardless of years of operation; or

The institution's previous institutional accreditation or pre-accreditation has lapsed or been withdrawn for any reason; or

The institution is currently pre-accredited by a U.S. Department of Education recognized institutional accrediting agency other than AALE (NEASC, MSACS, SACS, NCACS, NWAS, WASC, or other) and is free of recent or pending adverse actions by any of its institutional accreditors.

2. The institution can provide strong and sufficient evidence of financial stability for the coming four years.
3. The institution's liberal arts core is in at least the second semester of the third full year with enrolled students.

### *Institutional Accreditation*

An institution may apply for institutional accreditation if:

1. The institution can provide historical evidence of financial stability; and
2. The institution, including the liberal arts core, has been in continuous operation for at least five (5) years; and
3. The institution is currently pre-accredited by AALE and is free of any recent or pending adverse actions by AALE; or

The institution is currently accredited or pre-accredited by a U.S. Department of Education recognized institutional accrediting agency (NEASC, MSACS, SACS, NCACS, NWAS, WASC, or other) and is free of recent or pending adverse actions by any of its institutional accreditors.

[Policy under revision: The institution is not within the US, but can provide evidence that it is duly licensed by the country within which it operates to award undergraduate degrees and that it has approval from the proper domestic agency or body to work with accreditors from outside of the country.]

### **Change of Institutional Control**

Accreditation is NOT automatically transferable when there is a change in institutional control. Change includes, but is not limited, to sale; transfers of stock, assets, and liabilities; mergers; divisions; the complete replacement of one set of board members by another, in less than a six-month period; or the change in over seventy-five percent of board membership at any one time. Change of institutional control is considered a Substantive Change and the Substantive Change policy of this document applies.

Accredited or pre-accredited institutions that undergo a change of control must notify the Academy within thirty (7) days of the effective date of the change. The Academy will undertake a site-visit (staff and peer evaluators) of an accredited or pre-accredited institution that has undergone a change of control no later than six (6) months after the effective date of the change. The purpose of this visit is to ensure that educational quality is maintained throughout and subsequent to changes in ownership and control.

The Academy requires the institution to prepare and submit a detailed report, outlining the exact nature of the change in control; updated budget, strategic plan, projections of

revenue and the basis for the projections; an update of the courses, curriculum and faculty, outlining any changes from the last grant of accreditation; updated public documents, including handbooks, catalogs, policies and procedures – noting any changes from the previous grant of accreditation.

### **Complaints**

The U.S. Department of Education requires a recognized accrediting agency to maintain procedures for the filing of complaints against accredited institutions that might be out of compliance with AALE's standards or procedures, as well as procedures for complaints against the accrediting agency. AALE sets forth these procedures here, together with a procedure for the processing of complaints against institutions or programs that concern matters outside the scope of AALE's standards or procedures.

#### *Complaints against Institutions and for Failure to Comply with Standards or Procedures:*

To ensure the timely, fair, and equitable resolution of complaints against institutions and programs alleging failure to comply with the Academy's standards or procedures, the Academy will follow these procedures:

- 1) A person must file with the President of AALE a written complaint signed by the complainant alleging in detail non-compliance with the Academy's standards or procedures. The complainant must file the complaint within 180 days of discovering the facts giving rise to the complaint. Complainants must file the complaint using the form in Appendix I-a.
- 2) The President will acknowledge receipt of the complaint within 30 days of the date of its receipt by the Academy at the address designated in the form complaint in Appendix I-a.
- 3) The President will determine whether the report alleges facts that raise issues relating to an institution's or program's compliance with the Academy's standards or procedures within 45 days of the date of the Academy's receipt of the complaint.
- 4) If the President concludes that the complaint does not raise such issues, the President will close the matter and so inform the complainant in writing.
- 5) If the President determines that the complaint does raise the issues relating to the institution's or program's compliance with the standards or procedures of the Academy, the President will send the complaint to the head of the institution or program. The President will request the head to respond within 30 days of the date of the head's receipt of the complaint from AALE.
- 6) The President of AALE will review the response of the institution or program within 45 days of the date of AALE's receipt of the response from the institution or program. The complainant will not receive a copy of the response from the institution or program.

- 7) If the response from the institution or program shows that the institution or program is not out of compliance on the issues raised in the complaint, the President will close the matter and so inform the institution or program and the complainant in writing.
- 8) If the response from the institution or program shows that the institution or program is out of compliance with the Academy's standards or procedures, the President will appoint a duly qualified individual to investigate the issues raised by the complaint and the response and to prepare a report to the Academy within 60 days of the date of the Academy's referral of the matter. The Academy will use its procedures for the selection of members of site visit teams to appoint an investigator. The complainant will not receive a copy of the report of investigation.
- 9) Within 7 days of the date of AALE's receipt of the report of investigation, the President will forward the complaint, the response, and the report of investigation to the Board of Trustees for consideration at its next regularly scheduled meeting. At the meeting, the Board will review the complaint, the response, and the report of investigation and decide the issues presented by the matter.

The Board may decide as follows--

- a) The institution or program is found to be in compliance with the standards or procedures;
  - b) The institution or program is found to be generally in compliance with the standards or procedures, but the complaint has merit in this particular circumstance; or
  - c) The institution or program is found to be in non-compliance with the standards or procedures.
- 10) If the Board finds the institution or program to be in compliance, the President notifies the complainant and the institution or program in writing of the decision within 7 days of the date of the decision of the Board, and the matter is closed by the Academy.
  - 11) If the Board finds the institution or program to be generally in compliance with the standards, but that the complaint has merit in the particular circumstance, or that the institution or program is not in compliance, the President notifies the complainant and the institution or program in writing within 7 days of the date of the decision of the Board.
  - 12) In the event that the Board makes a finding in conformity with paragraph 11, the Academy will act as follows within 10 days of the date of the decision of the Board:
    - a) The Academy will place the institution or program on administrative warning. If placed on administrative warning, the institution or program must submit to the Academy a response to the administrative warning within 30 days of the date of receipt of

the administrative warning. Administrative warning status is not public.

- b) Within 30 days of the date of Academy's receipt of the institution's or program's response to the administrative warning, the Academy will either remove the administrative warning or place the institution or program on probation.
- c) If the Academy places the institution or program on probation, the Academy will also inform the Secretary of the U. S. Department of Education (Secretary) and the public. The institution or program must submit to the Academy a response to the probation within 30 days of the date of its receipt of the probation.
  - i) If the Academy does not receive a timely response to the probation, the Board will revoke the membership of the institution or the program, inform the Secretary of action, and make the action public by posting the action on the AALE website.
  - ii) If the Academy receives a timely response to the probation, the Board will review the response of the institution or program at a special meeting or at its next regularly scheduled meeting.

At this meeting, the Board will act as follows:

- a) revoke the membership of the institution or program, promptly inform the Secretary of the action, and make the action public by posting the action on AALE's website; or
- b) remove the probation, promptly inform the Secretary of the action, and make the decision public by posting the action on AALE's website.

*Complaints against Institutions or Concerning Matters outside the Scope of the Standards or Procedures:*

AALE occasionally receives complaints against member institutions or programs that do not relate to non-compliance with its standards or procedures. The Academy does not respond to any allegations regarding the personal lives of individuals concerned with its member and affiliate institutions. The Academy also will not adjudicate isolated individual grievances, and it will not act as a court of appeals in matters of admission, granting or transfer of credits, fees, disciplinary matters, collective bargaining, faculty appointments and dismissals or similar matters. Moreover, if the complaint includes matters that are currently the subject of, or directly related to, litigation in which the member institution or program is a party, the Academy will not consider the complaint until such litigation is resolved. The Academy may weigh the results of such litigation in its deliberations.

AALE will only consider complaints pertaining to matters outside the standards or procedures when the reported conditions are substantially documented and reflect conditions within an institution that jeopardize the quality of the educational program or the general welfare of the institution or program. Unless the situation suggests the kind of capricious or unprofessional action that impairs attainment of the institution's stated objectives, the Academy will not intervene.

The procedures for reviewing complaints are not judicial; they serve only as a method or means to communicate the allegations, determine the facts, and resolve the issues presented by the complaint. The President of the Academy shall have the authority to stop the complaint process at any point or at any time upon the appearance of evidence that would disqualify the complaint under policies outlined above or if the complaint otherwise moves beyond the scope or jurisdiction of the Academy.

To ensure the timely, fair, and equitable resolution of complaints against institutions and programs that are outside the scope of AALE's standards or procedures, the Academy will follow these procedures:

- 1) A person must file with the President of AALE a detailed, written complaint signed by the complainant. The complainant must file the complaint within 180 days of discovering the facts giving rise to the complaint. Complainants must file the complaint using the form in Appendix I-b.
- 2) The President will acknowledge receipt of the complaint within 30 days of the date of its receipt by the Academy at the address designated in the form complaint in Appendix I-b.
- 3) Within 45 days of the date of the Academy's receipt of the complaint, the President will determine whether the complaint reflects conditions within an institution that jeopardize the quality of the educational program and the general welfare of the institution or program or suggests the kind of capricious or unprofessional action that impairs attainment of the institution's stated objectives.
- 4) If the President concludes that the complaint does not raise such an issue, the President will close the matter and so inform the complainant in writing.
- 5) If the President determines that the complaint does raise such an issue, the President will send the complaint to the head of the institution or program. The President will request the head to respond within 30 days of the head's date of receipt of the complaint from AALE.
- 6) The President of AALE will review the response of the institution or program within 45 days of the date of AALE's receipt of the response from the institution or program. The complainant will not receive a copy of the response from the institution or program.
- 7) If the response from the institution or program shows that the institution or program has not engaged in conduct that jeopardizes the quality of the educational program and the general welfare of the institution or program

or suggests the kind of capricious or unprofessional action that impairs attainment of the institution's stated objectives, the President will close the matter and so inform the institution or program and the complainant in writing.

- 8) If the response from the institution or program shows that the institution or program has engaged in conduct that jeopardizes the quality of the educational program and the general welfare of the institution or program or suggests the kind of capricious or unprofessional action that impairs attainment of the institution's stated objectives, the President of the Academy will appoint a duly qualified individual to investigate the issues raised by the complaint and the response and to prepare a report to the Academy within 60 days of the date of receipt of the Academy's referral of the matter. The Academy will use its procedures for the selection of members of site visit teams to appoint an investigator. The complainant will not receive a copy of the report of investigation.
- 9) The President will forward the complaint, the response, and the report of investigation to the Board of Trustees for consideration at its next regularly scheduled meeting. At the meeting, the Board will review the complaint, the response, and the report of investigation and decide the issues presented by the matter. The President of the Academy will notify the complainant, the institution or program, and the investigator of the decision of the Board within 15 days of the date of the meeting of the Board.

*Complaints against the Academy:*

The U.S. Department of Education also requires a recognized accrediting agency to maintain procedures for the filing of complaints against accrediting agencies like the Academy. To ensure the timely, fair, and equitable resolution of complaints against AALE, the Academy will follow these procedures:

- 1) A person must file with the President of AALE a written complaint signed by the complainant alleging in detail the allegations supporting the complaint. The complainant must file the complaint within 180 days of discovering the facts giving rise to the complaint. Complainants must file the complaint using the form in Appendix I-c.
- 2) The President will acknowledge receipt of the complaint within 15 days of the date of AALE's receipt of the complaint at the address designated in the form complaint in Appendix I-c.
- 3) The President will determine whether the complaint alleges facts concerning senior officers (the President and the Director of Higher Education), a member of the Board of Trustees, a member of the Council of Scholars, or an AALE employee.
  - a) If the complaint concerns the activity of a senior officer or member of the Board of Trustees or the Council of Scholars, the President will

refer the complaint to the Executive Committee of the Board of Trustees and so inform the complainant within 30 business days of the date of the Academy's receipt of the complaint.

- i) Within 60 days of the date of the referral of the complaint to the Executive Committee, the Executive Committee will investigate the allegations of the complaint, complete that investigation, and render a final decision.
  - ii) The Chairman of the Board of Trustees (or his designee) will notify the complainant in writing of the final decision of the Board within 15 days of the date of the Board's decision.
- b) If the complaint concerns the activity of AALE employees, agents, and representatives other than those identified in paragraph 3a, the President will handle the complaint and so inform the complainant within 30 days of the date of the Academy's receipt of the complaint.
- i) Within 60 days of the date of the referral of the complaint to the President, the President will investigate the allegations of the complaint, complete that investigation, and render a final decision.
  - ii) The President (or his designee) will notify the complainant in writing of the final decision of the President within 15 days of the date of the President's decision.

### **Conflict of Interest in Accreditation**

The Academy attempts to guard against actual or apparent conflicts of interest in its accreditation and pre-accreditation procedures. A conflict of interest in accreditation is defined as a circumstance or situation in which an individual's duty to make an impartial or unbiased decision may be affected by prior, current, or anticipated affiliation, relationship, or association with the institution being evaluated.

The Academy's conflict of interest policy applies to Academy administrative staff, members of the Board of Trustees, members of the Council of Scholars, evaluation team members, appeals committee members, consultants, and other Academy representatives involved in an accreditation review process. This policy requires (but is not limited to) the following:

- a) That no person should have visited the institution as an accreditation evaluator within the preceding five (5) years;
- b) That no person be, have been (within the preceding five (5) years), or expect to be an appointee, paid consultant, or employee of the institution, or a close relative

of a person who is, has been (within the preceding five (5) years), or expects to be an appointee, consultant, or employee of the institution.

- c) That Board members with any interest in an institution under review recuses themselves from the vote on accreditation or pre-accreditation;
- d) That Council members with any interest in an institution or program under review recuses themselves from the vote on recommendation;
- e) That no person (associated with the Academy) serve or agree to serve as a paid consultant to the institution during the year following any evaluation visit for accreditation;
- f) That no person (associated with the Academy) should explicitly or implicitly have expressed opinions, personal or professional, that bear adversely on the integrity, quality, or accreditability of the institution or any of its programs.

Because an individual with the power of appointment or invitation cannot know of every possible conflict, evaluators are expected to refuse a team invitation if any conflict appears probable. Applicant institutions are also expected to comment on any possible conflicts of interest among proposed candidates for evaluation teams. Academy staff, Council members, Board members, appeals panelists, consultants and representatives should be alert to any such conflict. Refusal is expected if such a conflict exists. If a conflict of interest issue arises, the matter shall be forwarded to the President of the Academy, who shall gather information, solicit advice as appropriate, and attempt to resolve the matter to the satisfaction of all concerned, consistent with the published policies and procedures of the Academy and with consideration of standard practice within the post-secondary accreditation community. Should the President be unable to achieve resolution, he shall bring the matter to the Executive Committee of the Academy's Board. The Executive Committee shall seek resolution through procedures developed to address the specifics of each case.

### **Consulting Service**

Upon request, the Academy will supply a consulting service to institutions and programs (members and non-members) having questions relative to their future development or to assist in the resolution of problems. The Academy will also provide upon request resource persons to provide information about the Academy, its accreditation standards and criteria, and its policies and procedures. Formal requests for this service should be sent to the Academy's offices.

There is no charge for regular staff consultation, via phone or email, on matters of accreditation. However, travel related expenses of staff associated with development and administration of accreditation self-studies, site visits, or similar services must be reimbursed by the institution. *Staff consultations on matters not directly concerning accreditation are subject to an administrative fee.* In addition, fees may be assessed for

any non-staff consultants participating in reviews, visits, or other consultative actions conducted under the auspices of the Academy.

### **Decisions of Other Accrediting and Authorizing Agencies**

The Academy shall not accredit or pre-accredit institutions that lack legal authorization under applicable state law to provide programs of education beyond the secondary level. In considering whether to grant accreditation or pre-accreditation to an institution, the Academy will take into account decisions made by recognized accrediting agencies and state agencies with regard to the institution or program making an application to the Academy. Such decisions include but are not limited to the following:

- a) A decision by a U.S. Department of Education recognized accrediting agency to deny accreditation or pre-accreditation;
  - b) A pending or final action by a U.S. Department of Education recognized accrediting agency to suspend, revoke, or terminate accreditation or pre-accreditation;
  - c) A decision by a U.S. Department of Education recognized accrediting agency to place an institution on probation or equivalent status; or
  - d) A pending or final action by a state agency to suspend, revoke, withdraw, or terminate the institution's legal authority to provide postsecondary education.
- In its application for institutional accreditation form, the Academy requires institutions applying for accreditation to provide evidence that the institution has formal authority from the appropriate government agency to confer degrees, certificates, or diplomas in the jurisdiction(s) in which they operate.

To ensure that an institution continues to have legal authority under applicable State laws to provide a program of education beyond the secondary level subsequent to its submission of an application for institutional accreditation, institutions must submit to the Academy an *Annual Institutional Reporting Form (AIRF)*. In the AIRF, the institution must annually certify the following information:

- a) Whether it possesses formal authority from its appropriate government agency to confer degrees, certificates, or diplomas in the jurisdiction(s) in which it operates.
- b) Whether it is subject to pending action by a state agency to suspend, revoke, withdraw, or terminate its legal authority?
- c) Whether it is subject to pending action by a recognized accrediting agency to suspend, revoke, withdraw, or terminate its legal authority?
- d) Whether it has been subject to final action by a state agency to suspend, revoke, withdraw, or terminate its legal authority?
- e) Whether it has been placed on probation or an equivalent status by another recognized accrediting agency?

If the Academy grants pre-accreditation or accreditation to an institution notwithstanding the adverse actions described above, the Academy will provide the Secretary, within

thirty (30) days of the date of its action, with a thorough and reasonable written explanation, consistent with the Academy's accreditation standards, as to why the previous action by a U.S. Department of Education recognized accrediting agency or state agency does not preclude the Academy's grant of accreditation or pre-accreditation.

In the event that a U.S. Department of Education recognized accrediting agency takes adverse action or places on public probationary status any institution accredited or pre-accredited by the Academy, the institution or program must provide written notice to the President of the Academy within 20 days of the date of the action taken by the accrediting agency. As part of this disclosure, the institution must provide the Academy with information concerning the basis for the action of the accrediting agency. The Academy will review and determine what action, if any, it should take within 30 days of the date of its receipt of this written notice from the institution.

The Academy shall, upon request, share with other appropriate recognized accrediting agencies and recognized State approval agencies information about the accreditation or pre-accreditation status of an institution and any adverse actions that it has taken against an accredited or pre-accredited institution. The Academy will take this action within 30 days of the date of its receipt of a written request for such information from an appropriate recognized accrediting agency or a State approval agency.

### **Deferral of Action**

After the second consecutive deferral of an application for accreditation or pre-accreditation for failure to meet a specific standard, the Academy's Board shall adopt one of the following motions upon third consideration of the application:

- a) To approve the application;
- b) To approve the application with a request for a progress report;
- c) To require a response for the next Board meeting showing cause why the institution or program:
  - 1) should not be placed on probation;
  - 2) should not have accreditation or pre-accreditation denied or revoked;
- d) To place the institution on probation; or
- e) To deny or revoke accreditation or pre-accreditation.

## **Disclosure of Accreditation Materials and Information**

### *Members and Applicants:*

The Academy encourages institutions to make publicly available information about their accredited status and to share accreditation review materials with stake holders and agencies having legitimate claim to information beyond that made available to the general public (see Statement of Membership).

### *AALE:*

The Academy will notify the Secretary, the appropriate state education agency, the appropriate accrediting agencies, and the public of the types of accreditation decisions specified under Notification of Accreditation Decisions.

In addition, the Academy shall submit to the Secretary of Education in writing and in a timely manner:

- (a) A copy of any annual report that it prepares, as well as a copy, updated annually, of the Academy's directory of accredited and pre-accredited institutions and programs;

As well as:

- (b) Any proposed change in the agency's policies, procedures, or accreditation or pre-accreditation standards that might alter its--

- (1) Scope of recognition; or

- (2) Compliance with the criteria for recognition;

- (c) The name of any accredited or pre-accredited institution or program the agency has reason to believe is failing to meet its Title IV, HEA program responsibilities or is engaged in fraud or abuse, along with the reasons for concern about the institution or program; and

- (d) If requested by the Secretary, a summary of major accrediting activities during the previous year (an annual data summary);

- (e) Upon the Secretary's request, information that may bear upon an accredited or pre-accredited institution's compliance with its Title IV, HEA program responsibilities, including eligibility of the institution or program to participate in Title IV, HEA programs.

The Academy will not make publicly available any accreditation review materials supplied by an institution or by representatives of the Academy in the course of an

accreditation review, including self-studies, site evaluators' reports, institutional responses, and other documents and correspondence, unless an institution discloses part or all of such materials or information in a manner that misrepresents or distorts the decisions, reports, or findings of the Academy made in the course of the accreditation review, or its status of affiliation with the Academy. In such cases the President of the Academy will notify the chief executive officer or program director of the institution and inform them that corrective action must be taken. If the misrepresentation or distortion is not promptly corrected the Academy may, at its discretion, release a public statement in such a form and with such content as it deems necessary to provide the correct information. This holds for both applicants and member institutions.

### **Disclosure of Membership Information**

The Academy submits to the Secretary, upon request, information to assist the Secretary in resolving problems with any institution or program accredited or pre-accredited by the Academy that pertains to the institution's compliance with its Title IV, HEA program responsibilities. In addition, the names of any institutions or programs that the Academy accredits and has reason to believe are engaged in fraud, abuse, or fail to meet Title IV, HEA program responsibilities will be submitted to the Secretary with a statement outlining the reasons for these concerns.

The Academy publishes, through its website, an annually updated directory of pre-accredited and accredited institutions and programs, which states the year the institution or program will be up for renewal. A copy of the directory will be provided to the U.S. Department of Education as requested. Upon inquiry from the Department, State postsecondary review entities, or the public, the Academy will release the following information about an institution's status, in a statement, prepared in consultation with the institution:

- a) Date of the initial pre-accreditation or accreditation;
- b) Date and nature of the current on-site evaluation and subsequent actions by the Academy on the institution's accredited status;
- c) Date and nature of the next scheduled on-site evaluation;
- d) Dates of submission and action on the most recent written report required by the Academy;

For institutions on probation, the Academy will release its reasons for recommending probationary status and its plans to monitor the institution.

The Academy does not provide information to the general public about deferments of action on pre-accreditation or accreditation status, tabled motions, warning status, or show-cause orders. Also, adverse actions (denial, revocation, termination, of pre-accreditation or accreditation) are not communicated to the public until the available

reconsideration and/or appeals process is completed or the window for appeal has expired.

The Academy maintains and makes available to the public materials describing its accreditation membership categories, its application procedures, and the names, professional qualifications, relevant experience, and education of senior administrative staff and members of its policy and decision-making bodies, through the Academy's website.

### **Evaluation Team Report Disclaimer**

All evaluation team reports must begin with this notice:

*This site visit evaluation report and any statements therein regarding compliance with the accreditation standards and criteria of the American Academy for Liberal Education represent only the considered opinion of the site visitors at the time of the visit. Definitive evaluation of compliance and the accreditation decision will be made by the Academy's Board of Trustees, upon recommendation of the Council of Scholars, following a thorough review of application materials including, but not limited to, the institutional self-study, the site visit evaluation report, and any responses to the site team report submitted by the institution.*

### **External Budget Control**

Institutions dependent on an outside group for financial support (e.g. public/private agencies, state governments, churches, etc.) must retain the right to govern their own budgets through their governing boards. An outside group giving financial support to an accredited or pre-accredited institution can determine the amount it gives as well as define in broad terms the categories for which it is meant. However, the institution has the responsibility to determine in detail how the funds are allocated and spent. Once funds have been allocated, it is expected that the amount provided by the outside group not be reduced. If a situation develops where this is necessary, then it is the institution and its governing board and officers who determine how and where the reductions are made. If the outside group has a responsibility for pre- or post-auditing, it should be only for mathematical accuracy, authenticity of signatures, consistency with the provisions of the budget, and legality.

### **Membership**

[Policy currently under revision: Membership categories (both domestic and international) include: Institutional Accreditation or Pre-accreditation (same as Candidacy with other Title IV authorized accreditors), program accreditation, program certification, institutional or program affiliation and friends of the Academy (individuals, foundations or institutions). Membership is determined solely by the Academy's Board.]

## **Monitoring and Reevaluation of Accredited and Preaccredited Institutions and Programs**

All member institutions and programs are bound by the stipulations set out in the Standards and Criteria as well as by all official correspondences from the Academy. Any requested or prescribed reports, including *annual* reports (AIRFs), apply to *all* members and should be viewed as a continuation of the collegial discussion begun during the self-study process. Emphasis should be given to institution, student, teaching and curricula assessment. Reports are requested to verify that institutions are following their own procedures and maintaining the assessment levels as outlined and excepted by the Academy's documents and Board at the time of awarding membership or subsequent. AIRF requests will be sent to each member institution in October of each year. Dues are expected to be paid by Nov 30 and the completed AIRF and attachments by December 15. Academy staff will review each report and communicate any questions or concerns within 90 days.

As part of the monitoring regime, members are required to document continued compliance with *Academy Standards*, as indicated in the *Annual Institutional Reporting Form*, any requested special reports or Mid-Term reports. Initial self-studies and Mid-Term reports are to comprehensively address the Academy's *Standards*, including the following USDE requirements, as applicable:

- (i) Success with respect to student achievement in relation to the institution's or program's mission, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates;
- (ii) Curricula;
- (iii) Faculty;
- (iv) Facilities, equipment, and supplies;
- (v) Fiscal and administrative capacity as appropriate to the specified scale of operations;
- (vi) Student support services;
- (vii) Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising;
- (viii) Measures of program length and the objectives of the degrees or credentials offered;
- (ix) Record of student complaints;

(x) Record of compliance with the institution's program responsibilities under Title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, and the results of financial and compliance audits or program reviews undertaken by the Secretary.

A Mid-Term Review normally takes place at the mid-point of a *10 year award* of accreditation, though the Academy's Board reserves' the right to request such review for awards of shorter duration.

As part of this review, all accredited institutional members must submit an update of their original self-study, demonstrating the institution's continued adherence to Academy *Standards and Criteria, particularly with reference to any problems or goals cited in the preceding self-study, institutional response to the site team evaluation report, award letter and annual update.* A site visit by Academy staff will take place within 6 months of the submission of the mid-term report. The Academy may involve peer evaluators as part of the site visit.

If, on the basis of information received during monitoring of institutions, *or by other means*, it is determined that an institution or program may no longer be in compliance with the agency's standards or other requirements, a special evaluation, a site visit, or both shall be undertaken to determine the status of the institution or program's compliance. An institution that has been determined to be out of compliance will be required to "show-cause" why probation or an adverse action should not immediately be imposed.

**Monitoring Enrollment Growth:** Each accredited school shall provide AALE with enrollment data, by program and in the aggregate, on an annual basis – through the AIRF or upon request. In the event that any school reports enrollment growth in excess of 30% for any one-year period, AALE shall require the school to submit such additional reports that evidences the school's ability to accommodate significant growth and maintain educational quality.

*Record of Compliance:*

During its evaluative and monitoring processes, including initial and subsequent accreditation and pre-accreditation, the Academy, during annual updates (see above) and mid-term reviews, incorporates the results of USDE financial or compliance audits of pre-accredited and accredited members, program reviews, and any other information that the Secretary may provide to the Academy that may affect a member's standing in relation to Title IV financial aid funds.

*For Institutional Pre-accreditation*

During their term of pre-accreditation, institutions must:

a) Provide the Academy with concise annual reports describing progress and developments in relation to fulfillment of the Academy's *Standards and Criteria*; and

b) Complete and submit the *Annual Institutional Report Form*.

Pre-accredited institutions seeking a change in status to accreditation must demonstrate full compliance with the Academy's Eligibility Requirements, Education Standards, and Institution Standards through a detailed and concise *self-study* report and receive the site evaluation visit before the expiration of their term of pre-accreditation. Attainment of AALE pre-accreditation does not ensure or imply that an institution will eventually be granted AALE accreditation status.

#### *For Institutional Accreditation*

During their term of accreditation, institutions must:

a) Provide during the term of accreditation any requested reports, a *Mid-Term Report*, indicating continuing compliance with the Academy's *Standards and Criteria*; and

b) Complete and submit *Annual Institutional Reporting Form*.

c) Accredited institutions seeking renewal of accreditation status must demonstrate compliance with the Academy's Eligibility Requirements, Education Standards, and Institution Standards through a detailed and concise *self-study* report and must also receive a site evaluation visit before the expiration of their term of accreditation.

Note: Members given an award of five or ten years must accept at least one visit by AALE staff (and external reviewers if deemed appropriate by the Academy). The Academy reserves the right to schedule additional site visits, including unannounced ones.

Each year, the member institution **MUST** include with its AIRF, verification from the state jurisdiction of continued legal authority to grant the degrees which are accredited by the Academy.

#### **Non-Discrimination Policy**

It is the policy of the Academy that no person shall be subject to discrimination in whatever relationship with the Academy because of sex, race, color, creed, religion, or national origin.

## **Notification of Accreditation Decisions**

The Academy will notify the Secretary, the appropriate state education agency, the appropriate accrediting agencies, and the public of the following types of decision, no later than thirty (30) days after a final decision is made:

- a) A decision to award accreditation or pre-accreditation status for the first time;
- b) A decision to renew an institution's accreditation or pre-accreditation;

The Academy will notify the Secretary, the appropriate state education agency, the appropriate accrediting agencies, and, upon request, the public, within thirty (30) days of the following types of decision:

- a) A decision by an accredited institution to withdraw voluntarily from accreditation status. The date of the decision is the date on which the accrediting agency receives notification from the institution that it is voluntarily withdrawing from accredited institutional membership.
- b) A decision by an accredited institution or program to let its accreditation lapse. The date of the decision is the date on which accreditation lapses.

The Academy will notify the Secretary, the appropriate state education agency, the appropriate accrediting agencies, at the same time it notifies the institution or program of the decision, and the public within twenty-four (24) hours of notifying the institution or program, but no later than thirty (30) days after it reaches the following types of decision:

- a) A final decision to deny, withdraw, revoke, suspend, or terminate accreditation status;
- b) A decision to place on probation;

Adverse actions (deny, withdraw, revoke, suspend or terminate accreditation status) are not communicated to the public until the available reconsideration and/or appeals process is completed. When the final decision is to deny, withdraw, revoke, suspend or terminate the accreditation status, the Secretary will be notified of the decision at the same time as the institution. No later than sixty (60) days after the date of final decision, the Academy makes available to the Secretary, the appropriate state agency, and the public upon request, a brief statement summarizing the reasons for the Academy's determination to deny, withdraw, revoke, suspend, terminate, or otherwise affect the accreditation status, and the comments, if any, that the institution may wish to make with regard to that decision.

### **Postponement of Evaluation Site Visits**

If absolutely necessary, postponement of a planned evaluation site visit may be granted. Requests for postponement should be directed to the Academy's president in writing, and should be made as far in advance as possible. The institution is liable to cover all direct costs incurred owing to a postponement, as well a fee [see current Fees schedule].

The Academy also reserves the right to postpone a planned evaluation site visit if it becomes apparent that;

- a) the institution has not sent necessary materials (i.e., eligibility documents, self-study) in a timely fashion to site visitors; or
- b) key personnel at the institution will not be available to meet with site visitors during the dates previously agreed upon. Notice of such postponement will be made in writing to the chief executive officer of the applicant institution or program. Any expenses incurred in the event of a postponement by the Academy for these reasons will be covered by the applicant institution, as well a fee [see current Fees schedule].

### **Public Information**

The Academy maintains and makes publicly available materials describing:

- a) The scope of its accreditation authority;
- b) The categories of accreditation for which institutions and programs may apply;
- c) Its Eligibility Requirements for all categories of accreditation;
- d) Its *Standards and Criteria* for all categories of accreditation;
- e) Its *Policies and Procedures*;
- f) A list of member institutions and programs, including accreditation status;
- g) The members of its policy and decision-making bodies and principal and administrative staff (names, academic and professional qualifications, relevant employment and organizational affiliations).

The Academy's principal means for providing the public information will be through the Academy's website and/or any annual report produced. Additionally, the public may request these materials to be sent either electronically or through the US mail. All such requests will be complied with within 30 working days of the receipt of the request.

Through the Academy's website, the public will find a notice of;

a) the year when institutions are being reviewed for accreditation action, allowing opportunity for public comment. Any public comments must be received in writing by the Academy at least sixty (60) days prior to formal action by the Academy's Board of Trustees; institutions being reviewed for accreditation action will be notified of any public comments received, and will have opportunity to respond to these. Institutional responses to public comment must be received at least thirty (30) days prior to formal action by the Academy's Board of Trustees.

1) Third-party comment must be restricted to issues of accreditation. The procedure will not be used to settle disputes between individuals and institutions, whether faculty, students, administration, or members of other groups are involved. Third-party comments will not be accepted in cases where parties are in litigation with each other.

b) formal and final actions on institutions reviewed for accreditation action by the Academy's Board of Trustees; and

c) Notice of proposed new or revised standards and/or criteria for accreditation, including the opportunity for public comment prior to formal action by the Academy's Board of Trustees. Any public comments on new or revised standards and/or criteria for accreditation must be received in writing by the Academy at least thirty (30) days prior to formal action by the Board.

In addition the Academy's website will make available to the public in a timely fashion:

a) Notice of Academy events and meetings, including regular and special Board of Trustees meetings, General and Membership meetings, and research project meetings; and

b) Copies of all current regular and occasional publications of the Academy for viewing on-line or download without charge, including the *Standards and Criteria*, application materials, and the Academy's policies and procedures.

### **Public Members of the Board of Trustees**

At least one in every seven members of the Board of Trustees must be a public member. A "member of the public" must not be: (1) an employee, member of the governing board, owner, shareholder of, or consultant to, an institution or program that is either accredited or pre-accredited by the Academy, or which has applied for pre-accreditation or accreditation by the Academy; (2) a member of any association or organization related to, affiliated with, or associated with the Academy; or (3) a spouse, parent, child or sibling of an individual as defined in (1) or (2). The public members shall hold a baccalaureate degree or higher but shall not be employed in academia or retired from a professional career in academia. They must also demonstrate an understanding of the purposes of liberal education. This can be demonstrated through the individual's own educational experience, such as having graduated from a liberal arts college or a liberal arts program

at a comprehensive college or university, or through the individual's personal, professional or scholarly affiliations, associations, and activities that are related to one or more aspects of liberal education. Public members of the Board of Trustees may be sought for their professional competencies in areas relevant to the Academy, management and advancement of the organization, such as law, accounting, fundraising, financial management, public or political relations, regulatory compliance, or evaluation and monitoring. The Nominating Committee of the Board, which meets annually, nominates public members following nominating procedures as indicated in the *Bylaws* [See Article VIII].

### **Reconsideration of Accreditation Actions**

Reconsiderations of accreditation actions may precede, but not follow, appeals of adverse decisions made by the Board of Trustees of the Academy. Under most circumstances, a request for reconsideration of an accreditation action will constitute the first stage of review of an accreditation action taken by the Board (see Appeals of Adverse Decisions). The Academy refers institutions and programs requesting review of new financial information to the section of this manual entitled *Review of New Financial Information*.

#### *Actions Eligible for Reconsideration*

A request for reconsideration may be filed with the President of the Academy regarding the following actions:

- a) Denial of accreditation or pre-accreditation;
- b) Denial of renewal of accreditation or pre-accreditation;
- c) Revocation of accreditation or pre-accreditation;
- d) Termination of a new application for accreditation or pre-accreditation;
- e) The placing of an institution on probation;
- f) Continuing denial of a request for approval of a substantive change; or
- g) Continuing denial of action on an application for accreditation or pre-accreditation.

#### *Grounds for Reconsideration*

In the event of a decision by the Board of Trustees of the Academy in the categories outlined above under "Actions Eligible for Reconsideration," the grounds for reconsideration shall be:

- a) Allegations concerning bias or prejudice;

- b) Departure from published or customary procedures;
- c) Factual error of such magnitude as to warrant reconsideration;
- d) Failure to consider all the evidence and documentation presented in favor of an application; or
- e) New evidence that would affect the decision, except evidence of new financial information as defined in *Review of New Financial Information*.

*Procedures for Reconsideration*

- a) Within thirty (30) days of the date of the decision letter of the Academy's Board, the institution shall notify the President of the Academy in writing of its intention to seek reconsideration of the decision.
- b) The institution shall submit written documentation supporting its request not later than sixty (60) days from the date of the Board decision letter.
- c) The President shall determine whether the request for reconsideration meets the criteria necessary to proceed with reconsideration, and so informs the institution of his decision in writing.
- d) If the request meets the criteria, the President places the request for reconsideration on the agenda of the next regularly scheduled Board meeting.
- e) The Board acts on the request using its normal procedures, and the institution is informed in writing of the Board's decision within thirty (30) days of the decision.

The status of any institution or program shall remain unchanged during the reconsideration. There shall be no public notice of the decision until the review is completed and a final determination in the matter has been reached. For institutions or programs filing a request for reconsideration, deadlines for filing an appeal (see Appeals of Adverse Decisions) of a decision of the Academy's Board of Trustees will be tolled either:

- a) from the date of the letter from the President of the Academy informing the institution that the request for reconsideration does not meet the applicable criteria, or
- b) from the date of the letter informing the institution of the outcome of the completed reconsideration process.

## **Records Retention**

It is the Academy's policy to save all materials related to the last two completed accreditation cycles. This includes application and eligibility materials, self study and associated materials, on-site team evaluation team reports, the institution's or program's response to the evaluation team report, the award letter granting membership, any requested periodic or special review reports, and any substantive change requests and accompanying reports produced by the member school or the Academy. In addition, letters notifying institutions of accreditation decisions are kept on permanent file as are the minutes from all Board meetings any appeals hearings.

The Academy also keeps on file a record of complaints made to the Academy about any member institution (see Complaints).

## **Review of New Financial Information**

After it issues a decision subject to appeal (See Appeals of Adverse Decisions), the Academy will provide for the review of certain new financial information from an institution or program only as set forth below.

### *New Financial Information Eligible for Review*

An institution or program may file a request for the Academy to review new financial information only when the financial information meets all of the following criteria:

- a) the financial information was not available to the institution or program until after the date of the adverse action decision by the Board of Trustees;
- b) the financial information is significant and bears materially on the financial deficiencies identified by the Academy;
  - i) financial information is significant when there is a reasonable likelihood that it will change or modify the Board of Trustee's decision. Significance is not a specific quantitative threshold, but rather specific to a school, taking into account the nature and magnitude of the items to which the information relates within the context of the school's overall financial condition.
  - ii) financial information is material when, in the light of surrounding circumstances, it is probable that the information would have changed or influenced the judgment of a reasonable person relying on the information.
- c) the only remaining deficiency cited by the Academy is the failure of the institution or program to meet a standard of the Academy pertaining to finances.

### *Procedures for the Review of New Financial Information*

An institution or program may seek the Academy's review of new financial information only once and must follow these procedures:

- a) The institution or program will notify the President of the Academy in writing of its intention to provide new financial information that meets the definition set forth above in *New Financial Information Eligible for Review*, together with the documents and other materials supporting its request for the Academy to review the new financial information.
- b) The institution must submit its request for review of new financial information within 60 days of the date of the letter or written notification informing the institution or program of a decision subject to appeal (See Appeals of Adverse Actions).
- c) Within 15 days of the Academy's receipt of the institution's or program's supporting documents and materials, the President will place the request for review of new financial information on the agenda of the next regularly scheduled Board meeting. The Academy may also convene a special meeting of the Board of Directors to review and determine the request for review of new financial information as permitted by its bylaws. Institutions and programs seeking review of new financial information do not have a right to have a special meeting of the Board consider the request for review of new financial information.
- d) At the Board meeting and any subsequent Board meetings required to determine the issue, the Board will act on the request for review of new financial information and make a determination to sustain or withdraw its adverse action decision.
- e) The Chairman of the Board will inform the institution or program in writing of the Board's final determination within 15 days of the date of the final meeting of the Board that considers the request for review of new financial information.
- f) The Academy's review and determination of new financial information submitted under this section does not provide the institution or program with the basis for an appeal or suspend or interrupt the time period for filing a notice of intent to appeal with the Academy concerning the agency decision subject to appeal.

### *Effective Date of Action*

The status of any institution or program will remain unchanged pending the Board's completion of its review of the new financial information and its final determination. Until the final determination of the Board on the request for review of new financial information, the decision subject to appeal will not be in effect, and the accredited or pre-

accredited membership status of the institution or program will remain as it was until the Board has reached a final determination concerning the new financial information. There shall be no public notice of any adverse action decision until the Board reviews and determines the request for new financial information and the Board has reached a final determination.

In the event the Board determines not to make any changes to a decision subject to appeal after its review of new financial information or otherwise decides to sustain its adverse action against the institution or program, the Board's decision subject to appeal becomes final on the date of the Chairman's letter informing the institution or program of the Board's final determination and decision.

In the event the Board withdraws its decision subject to appeal or otherwise decides to revise that decision so as not to take an adverse action against the institution or program, the Board's action concerning the request for new financial information becomes final on the date of the Chairman's letter informing the institution or program of the Board's final determination and decision.

### **Revocation of Accreditation or Pre-accreditation**

Member institutions and programs failing to maintain the required standards, or failing to respond appropriately to administrative warning status, probationary status, or suspension of accreditation status (see Special Statutes), may have their membership revoked, with notice of right to request reconsideration and right to request appeal. Such institutions may apply for reinstatement through the normal application procedures of the Academy. *A request for readmission will not be considered until two years have elapsed and until any previous financial obligations of the applicant institution to the Academy have been satisfied.* Final action to revoke membership is published and notice forwarded to the Secretary within thirty (30) days of the action.

### **Role of Academy Staff in Accreditation**

The staff of the Academy manages the accreditation process, and ensures that all procedures, policies, and operations established by the Board of Trustees are carried out fairly and in accordance with Academy practice. The staff does not engage in accreditation evaluations of institutions or programs, nor does the staff take overt responsibility for operating the accreditation process at specific institutions. However, the staff is responsible for providing consultative services when requested to do so by institutions and programs. The staff is also involved extensively in the development of literature, workshops, and other services to assist institutions in structuring their own uses of requisite accreditation standards and procedures.

Each member of the Academy staff avoids conflicts of interest in the accreditation process by declining to

- (a) act inconsistently among member and applicant institutions;

- (b) make unilateral accreditation personnel decisions affecting any institution where the staff member was a student or employee;
- (c) direct institutions and programs concerning internal policy decisions;
- (d) make definitive judgments or promises concerning acceptability of the content of documents submitted for Council or Board review;
- (e) accept positions on boards, councils, or development groups associated with specific institutions of higher education;

### **Scope of Accreditation Authorization**

[Policy under revision: The Academy is recognized by the United States of Education (see *Secretary's Recognition Criteria*) as a national institutional (for purposes of Title IV) accrediting agency for the accreditation and pre-accreditation (Candidacy for Accreditation) of institutions of higher education that offer liberal arts degrees up to the baccalaureate level.

Both institutional accreditation and institutional pre-accreditation when granted by the Academy fully enable institutions to establish eligibility to participate in Federal student financial assistance programs administered by the Department of Education under Title IV of the Higher Education Act of 1965 as amended, as well as in student financial assistance programs established under other Federal legislation which require accreditation by a nationally recognized accrediting agency.

The Academy will inform the Secretary in writing and in a timely manner of proposed changes in agency policies, procedures, or accreditation standards that might alter the Academy's scope of recognition or compliance with the requirements of regulation 602.40 of the Secretary's Procedures and Criteria for Recognition of Accrediting Agencies].

### **Self-Assessment Procedures**

The Academy will regularly review its standards to ensure that they are adequate to evaluate the quality of the education provided by the institutions it accredits, are relevant to the educational needs of its students, and provide a consistent basis for determining the educational quality of different institutions. If the Academy determines, at any point during its systematic program of review, that it needs to make changes to its standards, the association will initiate action within 12 months to make the changes and will complete that action within a reasonable time.

A review of the standards will be an Academy Board agenda item at least every other year, and during the year in which the Academy conducts its systematic review of education standards.

The Academy will conduct a systematic review of its education standards every fifth year, at the close of the calendar year, consulting both internal and external constituencies. This review will gather qualitative and quantitative evaluations of Academy education standards and criteria; the review will specifically address educational relevancy and effectiveness. A comprehensive report describing results of the systematic review will be presented to the Academy's Board of Trustees at the next regularly scheduled meeting, and copies of the report will be made available to the general public through the Academy's website. A copy of the most recent survey questionnaire will be made available to interested parties as well.

### **Special Statutes**

#### *Administrative Warning Status*

Institutions may be placed on administrative warning by the Board for failing to:

- a) Payment of yearly membership dues to the Academy or meet other financial commitments;
- b) File annual reports;
- c) Apply for accreditation re-evaluation after due notice; or
- d) Provide timely responses to requests of the Board of Trustees of the Academy.

Before this action is taken, the Board shall send a show-cause letter requesting:

- a) Remediation of the problem; or
- b) An explanation of why administrative warning should not be invoked.

Administrative warning status may extend from one to twelve months at the discretion of the Board, and is removed as soon as the administrative issue is resolved. Failure to resolve the issue may result in revocation of membership.

Administrative warning status is not an adverse action and is not published. Institutions and programs with administrative warning status retain accredited membership and do not lose their voting or other rights and responsibilities.

#### *Probationary Status*

Any accredited member may be placed on probation (not an adverse decision) by the Academy's Board with notice of right to request reconsideration for:

- a) Failing to maintain the Academy's required standards and/or criteria;

- b) Failing to respond satisfactorily to the requests of the Academy; or
- c) Violation of qualitative aspects of the Academy's policies and procedures.

The probationary period shall *not extend beyond two (2) years*, the specific period to be determined by the Board of Trustees of the Academy at each time such action is taken, based on whether the issue relates to a program within the institution that students can complete in less than 12 months, 18 months, or two years or more in duration. A period of probation may be extended by the Board for good cause in exceptional circumstances, with specific, identified rationale and for a limited duration. Good cause includes, but is not limited to, immanent real or prospective resolution of an issue due to a funding timetable beyond the control of the institution, pending action or approval by an internal or external body or agency, natural disaster, or the need to complete a mandated structural or academic change beyond the control of the institution. Limited duration includes, but is not limited to, a time or timeframe certain or documentation that an action or event is being scheduled. Normally, the time does not exceed one-half of the time required for students to complete the program in question, e.g., 12 months, 18 months or more than two years. A self-evaluation and site evaluation visit may be required for the removal of probation.

Notice of probation is forwarded to the Secretary at the same time as the institution, and within thirty (30) days of the action, and thus becomes public in cases where the Academy serves as the designated institutional accreditor. Institutions on probation do not lose their voting or other rights and responsibilities. Probationary status is not considered an adverse action.

#### *Suspension of Accreditation Status*

Suspension of accreditation status can be applied only to institutions of higher education for which the Academy is the designated institutional accreditor for Title IV purposes. Automatic suspension of accreditation or pre-accreditation will occur under the following circumstances:

- a) The filing of Chapter 11 or Chapter 7 bankruptcy proceedings by the institution;
- b) Change in ownership or major changes in control without previous notice as stipulated in Academy policies and procedures (see Change of Institutional Control);
- c) The establishment without prior notice of a branch campus or other entity offering degrees and programs eligible for accreditation by the Academy, or significant expansion of affiliate uses of the institution's name without prior notice (see Branch and Other Off-Campus Locations).

Following automatic suspension, accreditation may only be reinstated upon application to and approval by the Academy's Board of Trustees. Because the suspension results without action or prior approval on the part of the Board, this change in status does not constitute formal withdrawal of accreditation, and thus is not an adverse action that is subject to reconsideration or to appeal (see Appeals of Adverse Decisions and Reconsideration).

It is expected that institutions with automatic suspension status will regain their accredited status at the earliest feasible time, or resign from the Academy. The suspension period will not exceed the earlier of six (6) months or the expiration of the institution's current accreditation period.

Failure to move expeditiously from suspended accreditation status to regular accreditation status within a period of six (6) months of the date of automatic suspension will be cause for revocation of accreditation. Revocation of accreditation is not automatic and must be approved by the Board.

If evidence concerning remediation of the reasons for automatic suspension is submitted within six (6) months of the date of automatic suspension and judged adequate by the Board, the Board will reinstate accreditation, retroactive to the date of automatic suspension, along with any time and other stipulations for future reviews.

If the Board of Trustees revokes the suspended institution's accreditation, or if the suspended institution does not present evidence concerning remediation of the reasons for automatic suspension within the earlier of six (6) months or the expiration of the previous grant of accreditation, the institution must then follow procedures for initiating accreditation.

Automatic suspension is not published, but notice is forwarded to the Secretary if the suspension lasts more than twenty-nine (29) days. Institutions with automatic suspension are suspended as members of the Academy and thus lose their voting rights during the suspension period.

### **Statements of Membership**

Institutions accredited or pre-accredited by the American Academy for Liberal Education may state their affiliation with AALE in their materials according to one of the following approved statements:

*For accredited or pre-accredited institutions:*

\_\_\_\_\_ [name of institution] is accredited [or pre-accredited] by the American Academy for Liberal Education, located at 127 S. Peyton Street, Suite 210, Alexandria, VA 22314. The Academy's telephone number is (703)-717-9717.

*For accredited institutions only:*

\_\_\_\_\_ [name of institution] is accredited by the American Academy for Liberal Education, which accredits outstanding liberal arts institutions and programs. This accreditation is institutional in nature with a focus on general education/liberal arts curricula. The Academy is located at 127 S. Peyton Street, Suite 210, Alexandria, VA 22314. The Academy's telephone number is (703) 717-9717.

An institution must disclose its affiliation with the Academy in an accurate and truthful manner. If it does not, the Academy will consider this a basis for removing the institution's or program's accreditation status. This includes accredited and pre-accredited institutions as well as those in the application process.

*Public Correction of Incorrect or Misleading Information Released by an Institution or Program*

If a member of the public is aware that an accredited or pre-accredited institution or has released incorrect or misleading information about –

- 1) The accreditation or pre-accreditation status of the institution;
- 2) The contents of reports of on-site reviews; and
- 3) The Academy's accrediting or pre-accrediting actions with respect to the institution, the person should immediately provide written notice to the Academy of the incorrect or misleading information. See the Academy's website: [www.aale.org](http://www.aale.org), for the current mailing address. In the written notification to the Academy, the member of the public should make the following reference:

*Notification of Incorrect or Misleading Information Released by [insert name of institution].*

Within 30 days of the date of receipt of the Academy's receipt of this written notice, the Academy will determine whether the accredited or pre-accredited institution has released incorrect or misleading information about (1) the accreditation or pre-accreditation status of the institution; (2) the contents of reports of on-site reviews; and (3) the Academy's accrediting or pre-accrediting actions with respect to the institution.

If the Academy determines that the institution has not released incorrect or misleading information about the foregoing items, the Academy will inform the member of the complaint in writing of the determination within 10 days of the date of its determination. If the Academy determines that the accredited or pre-accredited institution released such incorrect or misleading information, the Academy will provide a written notification of required correction to the institution in writing within 10 days of the date of its determination and direct the institution to correct, revise, or delete, as appropriate, the incorrect or misleading information. Within 15 days of the date of its receipt of the Academy's written notification of required correction, the institution must make a public correction of the incorrect or misleading information through a written letter to the Academy that the Academy will post on its website at [www.aale.org](http://www.aale.org) and that the institution or program will post on its website.

## **Student Complaints**

All institutions must maintain a file of written student complaints on-site and make these records available upon request to the Academy.

## **Substantial Compliance**

Substantial compliance constitutes fulfillment of the standard with only slight variances from the exact requirement. To determine whether the variance or lack of full compliance is sufficient to be considered substantial compliance, the institution must establish that the variance or defect can and is being corrected pursuant to a viable plan of action or is inconsequential in terms of the purpose of the standard.

## **Substantive Change**

Changes that fundamentally affect the nature of an accredited or pre-accredited institution, its educational programs, its allocation of resources, or its fulfillment of the Academy's standards and requirements are defined as substantive.

### *Types of Substantive Change*

These include, *but are not limited to*;

- a) Any change in the established mission or objectives of the institution;
- b) Any change in the legal status, form of control, or ownership;
- c) The addition of courses or programs that represent a significant departure from the existing offerings of educational programs, or method of delivery from those offered when the Academy last evaluated the institution;
- d) The addition of programs of study at a degree level different from that which is included in the institution's current membership;
- e) A change in needed credit hours or change from or to credit hours;
- f) Contracting with another educational entity that is not certified to participate in Title IV, to conduct 25 percent or more of the educational program;
- g) The addition of a location where 50 percent or more of the educational program is taught;
- h) The acquisition of any other institution or any program of another institution;
- i) The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study (which will be treated as an additional location unless the addition of such a permanent location would be deemed to be an extensive change, as defined below).

Any of the above will require a comprehensive review, with site visit, on the part of the Academy. In the event that a substantive change made or proposed by an institution is deemed by the Academy to constitute an *extensive* change, a new comprehensive

evaluation of the institution is required. An extensive change is defined as one that:

- a) Will lead to a doubling or greater of the student body at the institution;
- b) Will expand the mission or objectives or adds programs that more than double the academic offerings of the institution;
- c) Will more than double the size of the physical facility or change by more than 50 percent the proportion of classes taught on-line versus in a traditional, classroom setting.; or
- d) That seeks to serve specific and identifiable new groups of students who will constitute more than 30 percent of the total student body subsequent to the change (such as by developing specific programs for students with a specific and identifiable physical or developmental disabilities, or by developing programs targeted to a new classification of students, such as programs intended to serve a significant number of non-traditional students at a campus previously dominated by traditional students.

If the institution's request for additional locations enables the institution to seek eligibility to participate in Title IV, HEA programs, the Academy will conduct a comprehensive review and site visit to ensure that the institution has the fiscal and administrative capacity to operate the additional location while ensuring quality across the distributed enterprise including:

- a) clearly identified academic control;
- b) regular evaluation of academic facilities, faculty capacity, student services, and student learning at each location;
- c) adequate faculty, facilities, resources and academic and student support systems.;
- d) financial stability; and
- e) long-range planning for expansion.

Requests to change from programmatic to institutional accreditation or pre-accreditation, or vice versa, can be made only through a new application and cannot be considered as a substantive change to the current accreditation.

An institution seeking a substantive institutional or programmatic change must request approval in writing. The request must address the following questions:

1. What change is being proposed, including an assessment of the expected outcomes of this change (including impact on the organization's mission, enrollment, finances, personnel and breadth of educational offerings) as well as the category or categories (Substantive Change a – h) under which the substantive change request will be reviewed?
2. What factors led the organization to undertake the proposed change and what approvals have been obtained to implement the proposed change?
3. How will the organization implement and sustain the proposed change as well as evaluate the outcome of the change relative to its proposed goals?

A panel of three reviewers (which may include one Agency staff member as well as trained site visitors or members of the Council of Scholars) will be assembled to review the request for substantive change. Each member of the panel will review the application independently and will then discuss their findings either in person or during a conference call. If the final recommendation is to move forward in potentially approving the request for substantive change, the panel of three reviewers will then conduct a comprehensive review, including a site visit, and make a recommendation to the Board of Trustees. The recommendation will be considered by the Board of Trustees during a regular meeting or a special meeting called by the Chairman, and either affirmed (or declined) by a 2/3 majority of the voting trustees who will vote either in person or through electronic or mail ballot.

The review process can take anywhere between two and six months to be completed.

The Agency will notify the Department of Education in writing within 7 business days of any substantive change approval.

#### *Site Visits to Additional Locations of Accredited or Pre-Accredited Institutions*

The Agency will conduct a site visit, within six months, to each additional location the institutions establishes. In addition, a site visit will be conducted within six months if the institution or additional location:

- 1) Has not demonstrated (through its annual submission of the AIRF and/or other additional means) to the Agency's satisfaction that it has a proven record of effective educational oversight of additional locations; or
- 3) Has been placed on warning, probation or show cause by the Agency or is subject to some limitation by the Agency on its accreditation or pre-accreditation status.

Due to the nature of the Academy's mission and standards for high quality, the Academy does not grant pre-approval for adding new locations regardless of the number of years that a given institution has been accredited by the Academy or the number of additional locations that already exist.

In addition to visiting each additional location that is the subject of a substantive change request, the Academy will also conduct intermittent site visits to a representative sample of additional locations of institutions that operate more than three additional locations to ensure that the locations have the personnel, facilities and resources that it claimed to have in its application for approval of the additional location. A representative sample is defined by the Academy as one-third of an institution's additional locations, which will be visited during each five-year period.

For those institutions that experience rapid growth in the number of additional locations, the Agency will visit each location once every five years to ensure that it maintains educational quality. This review will include an assessment of facilities, personnel and resources to ensure that each location meets or exceeds the claims made in its application for approval of additional locations. Rapid growth is defined by the Agency as adding a number of additional locations in a 12 month period that exceeds ½ the number of current locations.

Site visits to institutions that have three or more additional locations or that have experienced rapid growth will be conducted by two individuals, which may include no more than one staff member. The site visit team will report their findings to the Board of Trustees.

Substantive changes initiated after the most recent evaluation are not included automatically in the institution's or program's accreditation. Therefore, an institution or program considering substantive change must notify the Academy early in its planning process and provide an explanation of the proposed change. Notice of the proposed change must be submitted at least thirty (30) days prior to implementation. Prior approval (not applicable for additions of branch campuses) of substantive changes must be obtained from the Academy before those changes may be included in the institution's accredited status. The effective change date is the date of approval by the Academy. The Academy's Board of Trustees must approve of substantive changes prior to the change being included as part of the grant of accreditation.

### **Teach-out Plans and Agreements**

The Academy requires that accredited and pre-accredited institutions submit for approval a teach-out plan with other institutions at least thirty (30) days **before** the teach out agreement is to take effect. Teach-out agreements must be made only with institutions that are accredited or pre-accredited by agencies recognized by the U. S. Department of Education.

This must be done when:

- a) The Secretary notifies the Academy that the USDE has initiated an emergency action against the institution, or an action to limit, suspend, or terminate an institution participating in any Title IV program **and** that a teach out plan is required.
- b) The Academy acts to withdraw, terminate, or suspend the accreditation or pre-accreditation of the institution.
- c) The institution notifies the Academy that it intends to cease operations entirely or close a location that provides one hundred percent of at least one program.
- d) A state licensing or authorizing agency notifies the agency that an institution's license or legal authorization to provide an educational program has been or will be revoked.

Institutions must ensure that:

- a) The teach-out institution can demonstrate that it has the resources to remain stable, carry out its mission, and meet all of the obligations to existing students in addition to meeting all of the other standards required under a teach-out agreement,; and that
- b) The teach-out institution can provide access to its educational program and services and a location reasonably proximate to that of the closing institution.
- c) That students are treated equitably and are notified of any additional charges. The following criteria will be used to assess equitable treatment of students under the teach-out plan:
  - 1) All credits earned by students in the fulfillment of general education and degree requirements of the original institution must be accepted by the teach-out institution and applied appropriate to meet both general education and specific degree, program or curriculum requirements;
  - 2) Students involved in a teach-out program cannot be required to take a minimum number of classes or earn a minimum number of credits at the teach-out institution in excess of the number of courses or credits required for the student to meet the requirements of the original degree or certificate program, major or curriculum;
  - 3) full-time students who have followed the prescribed curriculum or met the course requirements for their declared major prior to the teach-out period must be assured access to sufficient required and elective courses to complete the requirements of their degree or certificate program “on time” according to the original degree or program schedule;
  - 4) part-time students who have completed one-half or more of the requirements for a given program, degree or curriculum must be given an opportunity to complete the program as long as they attend at least half-time for two semesters each year until fulfilling the requirements of the program;
  - 5) students may be allowed, but cannot be required, to substitute required elements of their original program, major, or curriculum with requirements of a similar degree or certificate program offered by the teach-out institution;
  - 6) students required by their program or curriculum to participate in extracurricular educational activities, such as internships, cooperative work experiences, fellowships, or practicum must continue to have access to and receive credit for completing those activities and students participating in a teach-out must have the same access to such extracurricular activities as students who matriculated originally at the teach-out institution;

- 7) students participating in the teach-out program must be given equal opportunity to enroll in required and elective courses offered by the teach-out institution;
  - 8) students participating in the teach-out program must be allowed to transfer their grade point average to the teach-out institution, and this average shall be treated by the institution in the same way as grades earned from the teach-out institution;
  - 9) students who are participating in a teach-out program must have the same access to campus housing, student support resources, and extracurricular activities as do the other students attending the teach-out institution;
- d) The Academy will cooperate with the U. S. Department of Education as well as with the appropriate state departments and authorizing agencies to ensure, to the extent feasible, that students of closing institutions receive opportunities to complete their education without additional charge.
- e) That the teach-out institution provides a description of its transfer of credit policies, as established by the institution, and which must include a statement of the institution's current transfer of credit policies, including at a minimum the criteria that the institution uses regarding the transfer of credit earned at another institution and that the institution makes publicly available a list of institutions with which it has an established articulation agreement.
- f) In the event that the teach-out plan includes a program that is accredited by another recognized accrediting agency, the Agency will notify that accrediting agency of its approval within 7 business days of the decision.

The Academy requires institutions to enter into teach-out agreements as part of *any* teach-out plan.

### **Terms of Accreditation and Pre-accreditation**

#### *Institutional Categories*

Institutional pre-accreditation is granted for a period of up to three (3) years; renewable once for a total of **no more than five years**.

Institutional accreditation is granted for a period of up to ten (10) years.

### **Third Party Comment**

The Academy shall provide opportunity for third-party comment in writing regarding the qualifications institutions or programs being reviewed for accreditation or reaccreditation on issues relating to the Academy's accreditation standards, criteria, and policies. Notice of opportunity for third-party comment will be made through the Academy's website at least 90 days in advance.

Any third-party comments must be received in writing by the Academy at least sixty (60) days prior to the expected date of formal action by the Academy's Board of Trustees; institutions and programs being reviewed for accreditation action will be notified of any public comments received, and will have opportunity to respond to these. Institutional or program responses to public comment must be received at least thirty (30) days prior to formal action by the Academy's Board of Trustees.

Third-party comment is not a substitute for the Academy's procedures for Complaints against member institutions and programs (see Complaints).

Third-party comment must be restricted to issues of accreditation. The procedure will not be used to settle disputes between individuals and institutions, whether faculty, students, administration, or members of other groups are involved. Third-party comments will not be accepted in cases where parties are in litigation with each other.

### **Withdrawal**

An institution holding any accredited institutional member status may withdraw from such membership at anytime by providing *written notice* to the President of the Academy.

An applicant institution may withdraw from the application process for accreditation at any time by providing written notice to the President of the Academy. The institution is expected to cover all costs connected with its withdrawn application, including but not limited to travel expenses incurred in anticipation of an evaluation site visit. Application fees paid to the Academy are *not refundable*.

The Academy shall notify the Secretary, the appropriate State licensing or authorizing agency, the appropriate accrediting agencies, and, upon request, the public if an accredited or pre-accredited institution or program--

- a) Decides to withdraw voluntarily from accreditation or pre-accreditation, or
- b) Lets its accreditation or pre-accreditation lapse.
- c) Notification will be made within 30 days of AALE receiving a declaration that the institution or program is withdrawing voluntarily from accreditation or pre-accreditation; or within 30 days of the date on which accreditation or pre-accreditation lapses.

**APPENDIX I-a**

**COMPLAINT AGAINST INSTITUTION  
(NON-COMPLIANCE WITH STANDARDS AND CRITERIA)**

Name: \_\_\_\_\_

Street Address: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone Number: \_\_\_\_\_

Email Address: \_\_\_\_\_

Name of Institution or Program: \_\_\_\_\_

**Basis of Complaint**

1. What is the nature of your complaint? In your answer, please provide a description of the facts and attach any documents supporting your allegations. The description and supporting documents should include relevant facts that support the allegation that the institution is out of compliance with AALE's standards identified in your response to question 2.
  
2. Which sections of AALE's standards did the institution allegedly violate?
  
3. When did each violation occur?
  
4. Have you filed a complaint directly with the institution? If so, please describe (i) the steps that you have taken with the institution, (ii) the action, if any, taken by the institution in response to your complaint, and (iii) the institution's or program's response to your complaint. Please attach copies of your complaint and any response(s) from the institution.

5. Have you made any other complaints, including legal action, about the institution? If so, please identify the court, agency or individual with which or whom you have filed a complaint, describe the nature of the complaint, specify the date of the complaint, and state the present posture or outcome of the complaint. Please attach copies of your complaint and any response(s) from the institution.

Check all of the boxes below and sign the complaint. AALE will not process the complaint unless you mark all of the boxes.

I have read the complaint procedures outlined in AALE's policies and procedures manual located on the AALE website at [www.aale.org](http://www.aale.org).

I understand (i) that this process is not available to serve as a mediating or dispute-resolving process for persons with complaints about the policies or actions of an institution; (ii) that AALE will not intervene with an institution on behalf of an individual with a complaint against or concern about action taken by an institution that adversely affects that individual; and (iii) that the outcome of this process will not be the ordering of any individual relief for any person or specific action by an institution with respect to any individual.

I authorize AALE to send a copy of this complaint and supporting documents to the head of the institution, and I understand that AALE will not complete its review concerning this complaint until the institution has had sufficient opportunity to provide a response.

I certify that the information provided in this complaint is true and complete to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Mail to:  
American Academy for Liberal Education  
127 S. Peyton Street, Suite 210  
Alexandria, Virginia 22314  
Attn: President, AALE



whom you have filed a complaint, describe the nature of the complaint, specify the date of the complaint, and state the present posture or outcome of the complaint. Please attach copies of your complaint and any response(s) from the institution.

Check all of the boxes below and sign the complaint. AALE will not process the complaint unless you mark all of the boxes.

I have read the complaint procedures outlined in AALE's policies and procedures manual located on the AALE website at [www.aale.org](http://www.aale.org).

I understand (i) that this process is not available to serve as a mediating or dispute-resolving process for persons with complaints about the policies or actions of an institution; (ii) that AALE will not intervene with an institution on behalf of an individual with a complaint against or concern about action taken by an institution or that adversely affects that individual; and (iii) that the outcome of this process will not be the ordering of any individual relief for any person or specific action by an institution or with respect to any individual.

I authorize AALE to send a copy of this complaint and supporting documents to the head of the institution, and I understand that AALE will not complete its review concerning this complaint until the institution or has had sufficient opportunity to provide a response.

I certify that the information provided in this complaint is true and complete to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Mail to:  
American Academy for Liberal Education  
127 S. Peyton Street, Suite 210  
Alexandria, Virginia 22314  
Attn: President, AALE



the complaint, specify the date of the complaint, and state the present posture or outcome of the complaint. Please attach copies of your complaint and any response(s) from the institution or program.

Check all of the boxes below and sign the complaint. AALE will not process the complaint unless you mark all of the boxes.

I have read the complaint procedures outlined in AALE's policies and procedures manual located on the AALE website at [www.aale.org](http://www.aale.org).

I understand (i) that this process is not available to serve as a mediating or dispute-resolving process for persons with complaints about the persons, policies or actions of AALE; and (ii) that the outcome of this process will not be the ordering of any individual relief for any person or specific action by AALE with respect to any individual.

I understand that AALE will not complete its review concerning this complaint until the individual identified in my response to question number 1 has had sufficient opportunity to provide a response.

I certify that the information provided in this complaint is true and complete to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Mail to:  
American Academy for Liberal Education  
127 S. Peyton Street, Suite 210  
Alexandria, Virginia 22314  
Attn: President, AALE