

**Responding to Findings of Non-Compliance**  
-  
**Documentation Not Discourse**

**Institutional Response Report**

**2020 Virtual  
Annual Meeting  
Presentation**

**Denise R. Willis, Presenter**

# Presentation Objective

How to respond to team reports and letters from the Commission:

- Findings of Non-Compliance
- Requests for additional documentation from the Commission
- Suggestions

# No Findings of Non-Compliance Institutional Response Report

- Institutions that receive no findings or suggestions in an official team report must write a letter acknowledging receipt of the team report and requesting initial accreditation, reaffirmation of accreditation, approval of the substantive change, or a positive determination after Commission review of a focused visit team report.
- Response must be received within 30 days of the date that the report was transmitted from the Council office.

# Institutional Response Report

The institution must provide a response and supporting documentation, when appropriate, reflecting that the Commission's request for information is now **RESOLVED**. Therefore, it is critical that the institution correct the condition **BEFORE** responding.

# Institutional Response Format

- Document cover page
- Institution's response to Commission Letter
- Institution's attached documentation
  - Response to Findings of Non-Compliance (required)
  - Follow prescribed institutional response format
    - Create table of contents, number pages, and highlight important information
  - **Separate page** for each Finding of Non-Compliance
  - Response to Suggestions (suggested, but not required)
  - Send 1 **PDF** copy as 1 single document following the directions with the school's team report or letter
    - no hard copy documentation

# How to Respond

- **Be specific**
- **Provide documentation and highlight**
  - **Letters, memoranda, financials, purchase orders, work orders, photographs, etc.**
- **Start preparing for the response as soon as the team leaves (but remember, FNC are not official until COE sends the team report)**
- **Involve appropriate staff members in the response**
- **Correct the criterion before making the response**

# Top 10 Findings of Non-Compliance

- **COE List of Approved Programs (Conditions) [teaching a program not on the list]**
- **Employer Verification Forms (Standard 2) [wrong program name, no salary range]**
- **Advisory Committee Meetings**
  - **Institutional Advisory Committee (Standard 1) [not having a meeting]**
  - **Occupational Advisory Committee (Standard 2) [combined program OAC]**
- **Programs and Institutional Outcomes Follow-up Plan (Standard 3) [not systematic and continuous]**
- **Strategic Plan (Standard 4) [element #6-current and projected resources]**
- **Media Services Plan (Standard 5)**

# Top 10 Findings of Non-Compliance

- **Health and Safety Plan (Standard 6) [include guests]**
- **Annual evaluation of all institutional employees (Standard 8)**
- **Each faculty member possesses expertise in the area of responsibility that is actively maintained (Standard 8) [expired licenses, credentials]**
- **Plan for evaluating the effectiveness of student services (Standard 10) [Addresses how evaluation results are shared with faculty and staff]**



Let's look at Findings of Non-Compliance  
or  
How to avoid Findings of Non-Compliance











# Conditions #13

This is what a response should look like:

- **FINDING OF NON-COMPLIANCE:** The team finds the institution is offering Cosmetology (1500 clock-hours) at the Branch Campus located at 1507 N. State Street, Jefferson, NJ without COE Approval.
- **RESPONSE:** The institution received approval on February 21, 2018 from the NJ Board of Cosmetology to add Cosmetology (1500 hours) to the Branch Campus located at 1507 N. State Street, Jefferson, NJ. The institution has submitted a mini-form (Public Institutions)/Addition of a New Program (Non-Public Institutions) application to the Council of Occupational Education on March 1, 2018 to add the Cosmetology program to the Branch Campus located at 1507 N. State Street, Jefferson, NJ. The institution received a Commission approval letter on April 15, 2018. The COE List of Approved Programs is now consistent with the program offered by the institution. Following is a copy of the COE List of Approved Programs, copy of the COE request form, copy of COE approval letter and the state approval letter.

## Conditions #13

- **Documentation: (Documentation is placed directly behind the narrative response)**
  - **Copy of letter from the NJ Board of Cosmetology**
  - **Copy of COE Mini-Form/Addition of New Program form requesting addition of Cosmetology (1500 clock hours)**
  - **Copy of Commission Approval Letter**
  - **Copy of COE List of Approved Programs for the Branch Campus**

Associate Degree program – PUBLIC (Initial degrees are defined as a Change of Scope and require a site visit.)				\$1,000 for Initial Degree / \$500 for Subsequent Degree
Associate Degree program – NON-PUBLIC (Initial degrees are defined as a Change of Scope and require a site visit.)				\$1,000 for Initial Degree / \$500 for Subsequent Degree
Addition of New Program – NON-PUBLIC				\$500
Change in Existing Program – objectives, length, content, or other revisions equaling or exceeding 25% or more (NON-PUBLIC)				\$250

REQUIRED FORMS ARE LOCATED ON THE COE WEBSITE UNDER RESOURCES-APPLICATIONS AND FORMS

# Standard 2-Employer Verification Form

- **Must be completed by annually**
- **Completed by a bonafide potential employer who is in a position to make hiring decisions**
  - **Occupational Advisory Committee members may sign Employer Verification Forms if they have fulfilled the obligations of reviewing the program, per the Employer Verification Form, and if they are bonafide potential employers who are in a position to make hiring decisions**
- **Complete 3 forms for each program at each campus**
- **Must be completed in its entirety (No Blank Fields)**
- **Program Name, Program Length, Mode of Delivery of Program must match your COE List of Approved Programs**

# Check for:

- Each section of the EVF is completed
- Program titles match the COE List of Approved Programs
- Complete 3 forms for each program and each campus



**Commission of the Council on Occupational Education  
EMPLOYER PROGRAM VERIFICATION FORM  
for Postsecondary Programs**

**INSTRUCTIONS:**

- Complete three of these forms for **each program** at each campus.
- This form **must** be signed by a bona fide employer who is in a position to make hiring decisions.

Name of Institution	
Address	City/State/Zip
Name of Program	
Mode(s) of Delivery of Program (check ALL that apply):	
<input type="checkbox"/> 100% Traditional	<input type="checkbox"/> Hybrid
<input type="checkbox"/> Distance Education	

The length of this program is (indicate the number of hours in all boxes that apply):

<input type="checkbox"/> Clock Hours	<input type="checkbox"/> Semester Credit Hours	<input type="checkbox"/> Quarter Credit Hours
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The amount of tuition and fees charged for the total program is: \$

**EMPLOYERS' VERIFICATION STATEMENT**

I have reviewed the (name of program): \_\_\_\_\_  
 program and recommended requirements for admissions, program content, program length, program objectives, competency tests, learning activities, instructional materials, equipment, method of evaluation, the skills and/or proficiency required for completion, and appropriateness of the instructional delivery method(s) for the program.

**EMPLOYER**

Name:	Title:
Company Name:	Phone Number/Extension:
Address:	City/State/Zip:
Verifiable range of remuneration based on yearly, full-time employment for those that enter this field upon completion of the program is from \$_____ to \$_____ annually.	
Signature:	Date:

**Salary Range, Signature, and Date must be hand-written.  
(June 2019)**

# Employer Verification Form

- **FINDING OF NON-COMPLIANCE:** The team finds the Accounting program at the Main Campus does not have Employer Verification forms completed by three bona fide potential employers annually.
- **RESPONSE:** The institution has had three bona fide potential employers review the Accounting program on May 14, 2020 and recommend admission requirements, program content, program length, program objectives, competency tests, learning activities, instructional materials, equipment, methods of evaluation, level of skills and/or proficiency required for completion and appropriate delivery formats for the subject matter being taught. Following is a copy of the completed Employer Verification Forms.
- **DOCUMENTATION:** The documentation will be placed directly behind the narrative.
  - 3 Completed Employer Verification Forms for the Accounting program.(Be sure to check for the most up to date form)

## Standard 2-Occupational Advisory Committees

- Consists of a minimum of three members external to the institution who have expertise in the occupational program;
- Represents each service area covered by the program at each meeting (main campus and each branch campus);
- Has at least three external members who meet these criteria present at each meeting (with at least two members physically present and one virtually present); and,
  - External Members (on Advisory Committees)-Official members of an advisory committee who are not employees of the institution (staff, faculty, or administrators) or corporation who have no relation to employees of the institution (i.e. family members), and who have no financial interest in the institution. (2020 Handbook of Accreditation pg. 85)
- Meets at least twice annually; and
- Ensures that no fewer than three months separate each official committee meeting; and,
- Follows an agenda and maintains typed minutes to document its activities, recommendations, meeting attendance, and demographic information for each member.



# Occupational Advisory Committee Information 2020 Policy and Rules Pages 71-73

- Standard 2
  - Activities of Occupational Advisory Committee
    - A list of requirements for OAC's
  - Persons to Involve on Occupational Advisory Committee
  - Same Committee Members/Dual Purpose
  - Committee Meeting Attendance
  - Documentation Required/Recommended for Meetings

# Occupational Advisory Committee

- **FINDING OF NON-COMPLIANCE:** The team finds the occupational advisory committee appointed for the Accounting program at the Main Campus did not consist of a minimum of three members external to the institution to ensure that desirable, current and relevant practices of each occupation are being taught.
- **RESPONSE:** The institution has appointed an official occupational advisory committee for the Accounting program has four external members. The members are Cliff Owen, Accountant, Council on Occupational Education; Robert Smith, Bob's Accounting Services; Patricia Livingston, Accounting Department, Macy's; Carole Price, Accounting Department, S & S Bank. Following is a copy the Accounting Occupational Advisory Committee Roster, minutes and agendas and attendance roster.

# Occupational Advisory Committee

**DOCUMENTATION: (Documentation is placed directly behind the narrative response)**

- **A typed list (Official Roster) of the advisory committee members including name, email address, phone number, job title, place of employment**
- **Typed Agenda (include date/time/place) and Minutes of advisory committee meeting, including meeting attendance**
- **Attendance Rosters**

# Advisory Committee Minutes

- **Committee minutes should clearly document:**
  - **What committee(s) is meeting? (Program Name must match the COE List of Approved Programs)**
  - **When did the meeting take place?**
  - **Where did the meeting take place?**
  - **Who is on the committee?**
    - **External-not employees, no relation to employees of the institution and have no financial interest in the institution**
    - **List members, job titles, company name, contact information**
  - **Who was present at the meeting?**
  - **What were the topics of discussion?**
  - **What decisions/recommendations were made?**
  - **Attach any handouts, evaluations, PowerPoint presentations that were discussed in the meeting**

# Advisory Committees

- **Institutional Advisory Committee may serve as an Occupational Advisory Committee if the school has only one program.**
- **Plan ahead to assure there are two meetings a year**
  - **Ensure that no fewer than **three** months separate each official committee meeting**
- **Committee members may sign Employer Verification Forms if they have fulfilled the obligations of reviewing the program, per the Employer Verification Form, and if they are bonafide potential employers who are in a position to make hiring decisions**

# Advisory Committees

- **May use Advisory Committees to document annual/regular evaluation of written plans, policies and procedures**
  - **Admission by Exception Policy and Procedure (Standard 2)**
  - **Strategic Plan (Standard 4)**
  - **Plan for Assuring Health and Safety of Employees, Students, and Guests (Standard 6)**
  - **Operation and Maintenance of Physical Facilities/Technical Infrastructure Plan (Standard 6)**

## Occupational Advisory Committee Questions:

- Can company owners serve on an Occupational Advisory Committee?
  - Ask yourself...do they have expertise?
- Can several institutions in the same region or county hold their Occupational Advisory Committee meetings together? (NO-COE is an institutional accreditor)

## Standard 3- Program and Institutional Outcomes Follow-up Plan

- **The institution has a written plan to ensure that follow-up is systematic and continuous, and includes the following elements:**
  - **Identification of responsibility for coordination of all follow-up activities;**
  - **Methods for collection of data on completion, placement, and licensure exam pass rates;**
  - **Information collected from completers and employers of completers that is focused on program effectiveness**
  - **Methods for surveying completers and employers of completers to assess the level of satisfaction with the education that was received.**
  - **The program and institutional outcomes follow-up plan is reviewed annually by the faculty and administration (and revised as necessary).**
  - **Program and institutional outcomes follow-up information is used to evaluate and improve the quality of program outcomes.**
  - **Follow-up information is made available at least on an annual basis to instructional personnel and administrative staff.**



## Standard 3- Follow-up Plan

**FINDING OF NON-COMPLIANCE:** The team finds the institution has a written plan for program and institutional outcomes follow-up. The team did not find documentation that the plan was made available, at least, on an annual basis to instructional personnel and administrative staff.

**RESPONSE:** At the May 15, 2020 Staff Meeting the Placement Coordinator shared placement and follow-up data to all instructional personnel and administrative staff. Following is the agenda and minutes of the staff meeting, (list all documentation used to prove you are in compliance with the criterion.

## Standard 3- Follow-up Plan

**DOCUMENTATION:(Documentation is placed directly behind the narrative response)**

- **May 15, 2020 Agenda and Minutes of the instructional personnel and administrative meeting;**
- **Share the plan and the data**
- **Collection of information from completers and employers of completers;**
- **Information collected from completers and employers of completers focused on program effectiveness;**
- **Placement and follow-up information used to evaluate and improve the quality of program outcomes.**
- **Be sure to include all handouts, PowerPoint presentation, attendance documentation with your response.**

## Standard 4- Strategic Planning

The institution has written strategic plan that **includes**, as a minimum, the following components:

- Mission of the institution;
- Vision of the institution;
- Objectives for a minimum period of three years;
- Strategies for achieving the objectives;
- Current and projected financial resources that provide a basis for initiatives specified in the strategic plan; and
- Strategies for evaluating process toward achieving the objectives.
- The strategic plan is reviewed annually by the faculty, administration **and** institutional advisory committee (**and** revised as necessary)
- The results of the evaluation of progress toward achieving the objectives are documented annually

# Strategic Plan

- **FINDING OF NON-COMPLIANCE:** The team finds the institution has a written strategic plan. However, the strategic plan is not reviewed **annually** by the faculty, administration, **and** institutional advisory committee (and revised as necessary).
  
- **RESPONSE:** The strategic plan has been reviewed by the faculty and administration at the May 15, 2020 Faculty Meeting. The Institutional Advisory Committee met on June 1, 2020 to review the institution's strategic plan. Following is the agenda, minutes, PowerPoint presentation and attendance roster of the May 15, 2020 Faculty Meeting, an agenda, minutes, PowerPoint presentation and attendance roster of the June 1, 2020 Institutional Advisory Committee meeting.

# Strategic Plan

**DOCUMENTATION: (Documentation is placed directly behind the narrative response)**

- **Agenda and Minutes of the May 15, 2020 Faculty Meeting**
  - Attendance Roster
  - Strategic Plan Handouts, PowerPoint Presentation, etc.
  - **Highlight the agenda and minutes**
  
- **Agenda and Minutes of the June 1, 2020 Institutional Advisory Committee Meeting**
  - Official Roster of Members
  - Attendance Roster
  - Strategic Plan Handouts, PowerPoint Presentation, etc.
  - **Highlight the agenda and minutes**

Remember: Commissioners are reading your response. Make documentation easy to find.

## Standard 5- Learning Resources

The written plan for **its** media services **which** is appropriate for and inclusive of all methods of program delivery to the institution, and includes the following:

- The scope and availability of the services.
- A variety of current and relevant educational materials, such as reference books; periodicals and manuals of a business, professional, technical, and industrial nature; audio-visual materials and equipment; internet access to sites with educational and reference materials appropriate to program offerings to help fulfill the institution's purposes and support its educational programs;
- The staff person (administrative, supervisory, or instructional) responsible for the implementation and coordination of the media services.

## Standard 5 Learning Resources

- **Roles and responsibilities of designated staff member(s).**
- **Orientation for user groups (i.e., instructors, students, and others).**
- **Facilities and technical infrastructure essential for using media materials.**
- **Annual budgetary support for the services.**
- **Annual evaluation of the effectiveness of media services and the utilization of the results to modify and improve media services.**

## Standard 5: Learning Resources

**FINDING OF NON-COMPLIANCE:** The team finds the institution has a written plan for its media services and it is in use; however, the plan did not include the scope and availability of the services.

**RESPONSE:** The institution updated the written plan for media services to include the scope and availability of the services. Following is an updated Media Services Plan. Page 3 of the Media Services Plan highlights the scope and availability of services

**DOCUMENTATION: (Documentation is placed directly behind the narrative response)**

- Updated plan (include revision date)
  - Written Plan Components:
    - Objectives, purpose, or intent of the plan
    - Outline activities to achieve the objectives
    - Specify roles and responsibilities
    - Include guidelines or timelines for review and evaluation

Definition of a Plan is found on page 88 of the 2020 Handbook of Accreditation



## Plans:

- Check for commas, conjunctions and multi-parts
- Look carefully at the elements of each plan to ensure they are included
  - Title the plan just as it is title in the Check Sheets
  - Use bold headings

## It's the little things.....

### Standard 6- Physical Resources and Technical Infrastructure

**CRITERIA:** A plan for assuring the health and safety of the institution's employees, students, and guests is in use and includes procedures for reporting and investigating incidents affecting the health and safe of the institution's constituents.

The health and safety plan: has been distributed to employees; is available to students; and is valuated annually with appropriate input from employees and students (and revised as needed.)

# Physical Resources and Technical Infrastructure

**FINDING OF NON-COMPLIANCE:** The team finds the institution has a health and safety plan and it is in use. The team did not find documentation that the plan is evaluated **annually** with input from employees **and** students (and revised as necessary).

**RESPONSE:**

**DOCUMENTATION:** (Documentation is placed directly behind the narrative response)

**Questions:** How do you document the evaluation of a plan? How do document input from employees and students?

## Standard 8- Human Resources

**CRITERIA:** Procedures have been developed for the continuous evaluation of the performance and effectiveness of full-time and part-time employees, with at least an annual written formal review and evaluation.

**FINDING OF NON-COMPLIANCE:** The team finds two full-time employees, Denise Willis and Marcia Cox, did not have a 2020 annual written formal review and evaluation.

**RESPONSE:**

**DOCUMENTATION:** (Documentation is placed directly behind the narrative response)

**Question:** Do you need to send an evaluation for all 200 employees?

# Human Resources

Documentation is available to demonstrate that the institution plans, provides, supports, and annually documents professional growth opportunities for and participation by all faculty members.

**FINDING OF NON-COMPLIANCE:** The team finds no documentation that Denise Willis and Marcia Cox participated in professional growth activities during 2020.

**RESPONSE:** On March 18, 2021, Denise Willis and Marcia Cox participated in First Aid training sponsored by the Red Cross. Following is the \_\_\_\_\_

**DOCUMENTATION:** (Documentation is placed directly behind the narrative response)

## Standard 10- Student Services and Activities

- **CRITERIA:** The institution has a written plan for determining the effectiveness of student services and ensures that the plan:
  - Identifies responsibilities for coordination of student services;
  - Provides for counseling of students;
  - Is evaluated on an annual basis; and,
  - Addresses how evaluation results are shared with faculty and staff
- **FINDING OF NON-COMPLIANCE:** The team finds the institution does not have a written plan for determining the effectiveness of student services.

# Student Services and Activities

- **RESPONSE:** The institution has developed and implemented a written plan for determining the effectiveness of student services. The plan was presented to the faculty by the Dean of Student Services at the January 12, 2021 faculty meeting. The Dean described the new elements on the student exit surveys.....

# Student Services and Activities

- **Documentation: (Documentation is placed directly behind the narrative response)**

## Student Services Effectiveness Plan

- Identifies responsibilities for coordination of student services;
  - Provides for the counseling of students;
  - Is evaluated on an annual basis; and,
  - Addresses how evaluation results are shared with faculty and staff.
- 
- **Go back to the key words: Describe how your institution complies; how do you ensure these elements are taking place**
    - Identifies
    - Provides counseling of students
    - Shared
    - Annual (All plans are evaluated annually and are in use)



# Institutional Response Report

Submitting to COE....Denise or Renee  
and Amanda

**PLEASE SUBMIT ONE DIGITAL COPY, AS ONE DOCUMENT, TO COE WITHIN 30 DAYS OF RECEIVING THE TEAM REPORT. IF RESPONDING TO A COMMISSION LETTER, COMPLY WITH THE DEADLINE STATED IN THE CORRESPONDENCE.**

**IF THE RESPONSE IS TOO LARGE TO E-MAIL, PLEASE SUBMIT THE RESPONSE ON A FLASH DRIVE, OR IN DROPBOX, OR BY OTHER DIGITAL METHODS BY THE STATED DEADLINE.**

## Do's and Don'ts When Submitting your Response Report

- **Don't submit blank forms**
- **Don't submit the entire catalog-(revised cover and the revised page)**
- **Do submit your response as one pdf file**
- **Do highlight the important text on the page**
- **Do number the pages and be sure to include a table of contents (Check for accuracy)**
- **Do contact COE staff for assistance**
- **Don't drown the Commission Readers with irrelevant information**
- **All plans need to be evaluated and in use**

# Resources

- **COE publications**
  - **Handbook of Accreditation**
  - **Policies and Rules of the Commission**
  - **Self-Study Manual**
- **COE Staff (1-800-917-2081)**
- **COE Web Site ([www.council.org](http://www.council.org))**