Responding to Findings of Non-Compliance

*Documentation Not Discourse*

Institutional Response Report

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**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

2021 Generic Check Sheets
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/standard criteria BEFORE responding.

- Demonstrate that the institution is in compliance since the accreditation visit.
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

PROOF NOT PROMISES
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]
- Program Outcomes Follow-up Plan (Standard 3) [missing the elements of the plan]
- 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]

- Standards 1-10: All Plans must be evaluated and in use
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, 2021, 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, 2021, 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, 2021. 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:
  - 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

Documentation is placed directly behind the narrative response.

REQUIRED FORMS ARE LOCATED ON THE COE WEBSITE UNDER RESOURCES-APPLICATIONS AND FORMS.
Standard 2-Employer Verification Form

NEW EVF's on COE Website - January 2021

- 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
**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:** On May 14, 2021, the institution had three bona fide potential employers review the Accounting program and provide remuneration for those who enter the field.
- Following are the 3 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)

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**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. **(2021 Handbook of Accreditation pg. 87)**
- 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.

2021 Generic Check Sheets
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

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 and 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/name of committee) and Minutes of advisory committee meeting, including meeting attendance. Minutes need to reflect all of the new requirements mentioned on the Standard 2 check sheets/B. Occupational Advisory Committees.

- Attendance Rosters

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**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?
    - Be sure to address all the items from the check sheets that need to be reviewed and recommended. Standard 2 B. Occupational Advisory Committees.
  - What decisions/recommendations were made?
  - Attach any handouts, evaluations, PowerPoint presentations that were discussed in the meeting

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2021 Generic Check Sheets
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 to maintain readiness (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? How will you prove 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 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.
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, 2021, 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.

DOCUMENTATION:
- May 15, 2021, 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.
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.

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### 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, 2021, Faculty Meeting. The Institutional Advisory Committee met on June 1, 2021, to review the institution’s strategic plan. Following is the agenda, minutes, PowerPoint presentation and attendance roster of the May 15, 2021, Faculty Meeting, an agenda, minutes, PowerPoint presentation and attendance roster of the June 1, 2021, Institutional Advisory Committee meeting.
**Strategic Plan**

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

- Agenda and Minutes of the May 15, 2021, Faculty Meeting
  - Attendance Roster
  - Strategic Plan Handouts, PowerPoint Presentation, etc.
  - **Highlight the agenda and minutes**
- Agenda and Minutes of the June 1, 2021, 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.

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**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.

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
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 to maintain readiness 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 evaluated annually with appropriate input from employees (and revised as necessary), and ensures basic information about the plan is available to students.
**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 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?

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**Standard 8- Human Resources**

**CRITERIA:** Procedures are in place for the continuous evaluation of the performance and effectiveness of full-time and part-time employees, with at least an annual written review and evaluation.

**FINDING OF NON-COMPLIANCE:** The team finds two full-time employees, Denise Willis and Marcia Cox, did not have 2021 annual written reviews and evaluations.

**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 2021.

RESPONSE: On January 18, 2022, Denise Willis and Marcia Cox participated in First Aid training sponsored by the Red Cross.

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, 2022 faculty meeting. The Dean described the new elements on the student exit surveys.

**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

How to submit your report to the Evaluation Team:

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)
  
  Evaluation Team:
  - Elizabeth L. Davis, Assistant Executive Director
    Elizabeth.davis@council.org
  - Robert Carrigan, Evaluation Coordinator
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- COE Web Site (www.council.org)