

PROOF, NOT PROMISES: RESPONDING TO FINDINGS OF NON-COMPLIANCE



COE 2022 Summer Conference
Wichita, KS
July 22-23

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AGENDA



- Topic 1: When a Response Report is needed
- Topic 2: How to format the Report
- Topic 3: Appropriate documentation
- Topic 4: Frequent FNCs

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Introduction

When an institution hosts a COE team—whether for initial accreditation, reaffirmation of accreditation, a substantive change, or a focused review—the visiting team will submit a report of its findings to the Council, and the COE staff will forward it to the school. If there were findings of non-compliance (FNCs) indicated in the report, the institution must submit a response to each finding and include documentation that the school is once again in accreditation compliance.



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If there are no FNCs in the Team Report

- Write a letter to the Executive Director of the Commission acknowledging receipt of the team report and requesting initial accreditation, reaffirmation of accreditation, or a positive determination after a focused review
- Responses must be received by the Council within 30 days of the date the report was transmitted to the institution
- **Substantive Change site visit reports with no FNCs do not require a response**

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“Fix first. Report afterwards”

- The Response Report must state that the non-compliant issue is now *resolved*
- The correction to the accreditation Condition or Standard Criterion must have occurred *before* submitting the Institutional Response Report
- Documentation verifying the problem fix is essential to the Response Report
- Do not state in the Response Report that the problem issue “will be resolved” at a later date

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Format for the Response Report

- Cover page
- Letter to the Commission introducing the Report
- Table of Contents indicating page number for each FNC
- A separate page for each FNC
- Documentation (highlighted) verifying compliance behind each FNC page
- All FNCs must be included; responding to Suggestions appearing in the team report is optional; these should follow the same format at responding to FNCs
- The Institutional Response Report is submitted to COE as one single PDF—not separate PDFs for each finding of non-compliance

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The Cover Page

Decatur Technical College

COE Accreditation Visit

May 16-18, 2022

INSTITUTIONAL RESPONSE REPORT

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Letter to the Commission

Dr. Gary Puckett
Executive Director of the Commission
Council on Occupational Education
7840 Roswell Rd., Bldg. 300, Suite 325
Atlanta, GA 30350

Dear Dr. Puckett:

The faculty and staff of Decatur Technical College are pleased to present to you the institution's response to the team report from the college's reaffirmation of accreditation visit held on May 16-18, 2022. We appreciate the time and attention paid to our college by the COE team, and we are confident that we have successfully responded to and documented those areas the team determined to be out of accreditation compliance at the time of their visit...

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Finding 1: Conditions/Criterion 25	3
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Finding 5: Standard 8/Criterion A-1	23

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Format for each FNC page

- State the CRITERION from the Check Sheet
- Write the team's FINDING, exactly as phrased in the Team Report
- State HOW THE SCHOOL RESOLVED the FNC and how it is now in compliance with the Criterion
 - Be specific
 - Be brief
- Include DOCUMENTATION verifying compliance starting the next page; highlight specific sections as needed

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Sample FNC page

Conditions/Criterion 25: *The institution has named an accreditation liaison officer who is a staff member located at the main campus.*

Finding: “While the team finds that Mr. Paul Anderson serves as the institution’s accreditation liaison officer, the team did not find evidence that Mr. Anderson was an employee of the institution.”

Response: Mr. Paul Anderson was first engaged by Decatur Technical College in March 2019 as a consultant charged with aligning the college’s administrative processes with COE accreditation requirements. In January 2020, Mr. Anderson was offered, and accepted, an offer to become a full-time employee of the institution...

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Sample Documentation page(s)

- Copy of **employment contract** for Mr. Anderson that shows he is currently employed by the college as Institutional Compliance Director
- Copy of **organizational chart** showing Mr. Anderson’s position within the company (**chart highlighted** to show that Mr. Anderson is the college’s **Compliance Director**)
- Copy of the **page from the college catalog** listing Administrative Staff and providing main campus office location, phone number and email address for **Mr. Anderson (section highlighted** for easy reference)

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Multi-Part Criteria FNCs

- Several accreditation criteria include multiple requirements
- Example: “Job-related **health, safety, and fire-prevention** are an integral part of instruction and incorporated into curricula as is appropriate to the occupation” (Std 2/C-8)
- Often a team finds that you may meet two out of the three requirements (as shown above), but not the third; this will be expressed in the written Finding in the team report.
- You are required to show documentation only for the part of the Criterion not met.
- Your documentation should highlight **fire-prevention** precautions, for example, in the response.

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Key Points

- Organize the Institutional Response Report as recommended in this workshop
- Be sure the supporting documentation shows that the institution has *already* implemented the necessary changes
- Do not bury the Commission with pages and pages of documents when only one or two will verify compliance
- When submitting documents, use highlighting to focus on specific points
- Submit the response on time! Late submissions will be fined a penalty of \$2,000

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Where to find COE forms?

- Go to www.council.org
- Click on the RESOURCES tab at the top of the home page
- Scroll down to *Applications and Forms*
- Find forms in *Self-Study Forms for Institutions*
 - Employer Verification Forms, for example
- Find team visit Check Sheets in *Visiting Team Forms 2022* (or 2023, etc.)

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Most frequent FNCs

- Programs in school catalog/website do not match the COE Approved Programs List in MyCouncil (program name, hours and delivery methods)
- Incorrect Employer Program Verification Forms (wrong program name, incorrect hours, no salary range)
- Advisory Committee documentation (out-of-date rosters, incomplete minutes, “combined” meetings)
- Written Plans and Procedures (no evidence of implementation; no evaluation)
- Record of external business contacts for all FT and PT faculty
- Annual evaluation of all FT and PT employees of the institution

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For answers to Accreditation Visit Team Report questions:

- Dr. Robert Carrigan
 - (800) 917-2081, ext, 101
 - robert.carrigan@council.org
- Ms. Shelby Griffeth
 - (800) 917-2081, ext. 100
 - shelby.griffeth@council.org

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Substantive Change Team Reports

- Issued after Change of Location, New Campus, Change of Ownership, etc. visits
- Site Visit Reports with **NO** findings of non-compliance do not require a response
- Site Visit Reports showing FNCs require a response within 30 days of the date the team report is transmitted via email to the institution
- Response should comply with the required format and should include documentation verifying compliance

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Format for Responses to Substantive Change Site Visit Reports

- Cover page
- Separate page (with attachments following) for each FNC
 - Write the **Criterion**
 - State the **Finding** as it appears in the report
 - Provide a brief **Response**
- Submitted as one PDF
- Due 30 days after receipt of the 3-Point Letter with the SVR

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For answers to questions about Substantive Change SVRs

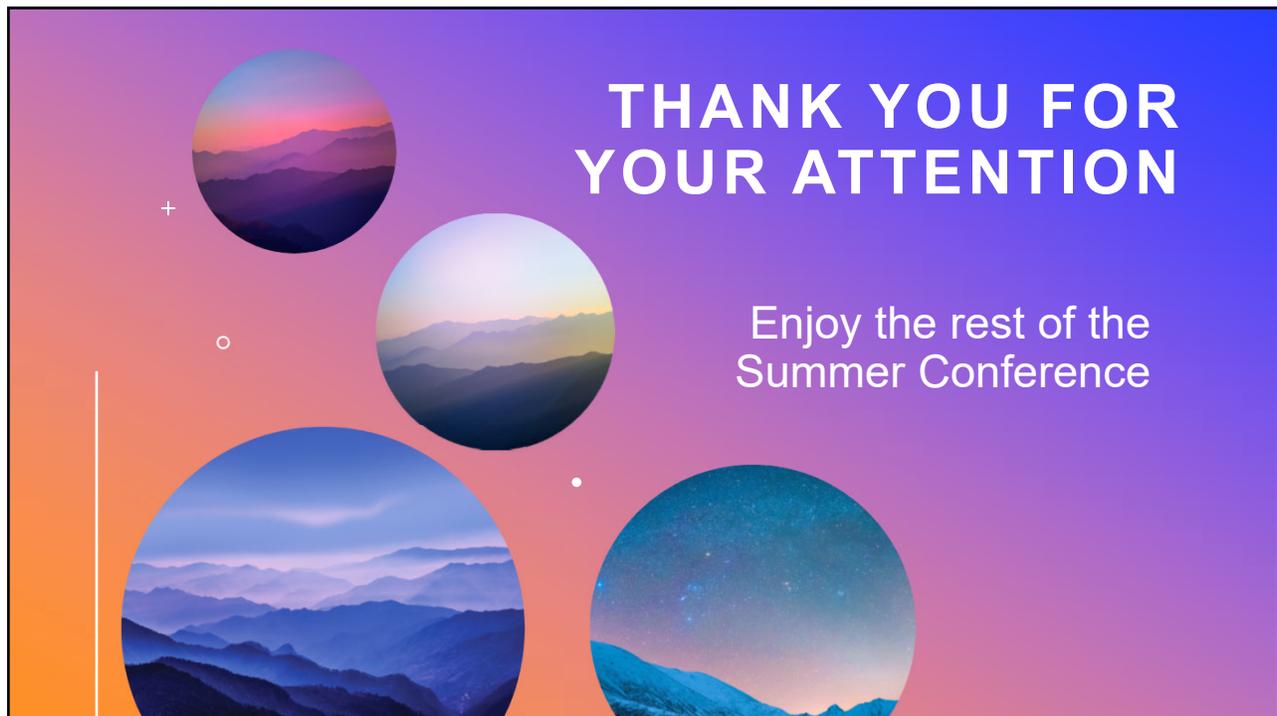
- Dr. Alex Wittig
 - (800) 917-2081, ext. 202
 - alex.wittig@council.org
- Dr. Kallan Williams
 - (800) 917-2081, ext. 204
 - kallan.williams@council.org
- Ms. Anita Lachonna
 - (800) 917-2081, ext. 203
 - anita.Lachonna@council.org

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Combination Visits

- On rare occasions a visiting team will be assigned to do an accreditation visit and a substantive change visit at the same time
- The team will issue two reports: a full set of accreditation check sheets (sent to the Evaluation Division), and a Site Visit Report for the substantive change (sent to the Compliance Division)
- The same FNCs from the accreditation check sheets will also appear on the SVR if they are listed there
- The institution should submit two separate responses with duplicate supporting documentation—the accreditation report to Dr. Carrigan and the substantive change report to Dr. Wittig or Dr. Williams

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