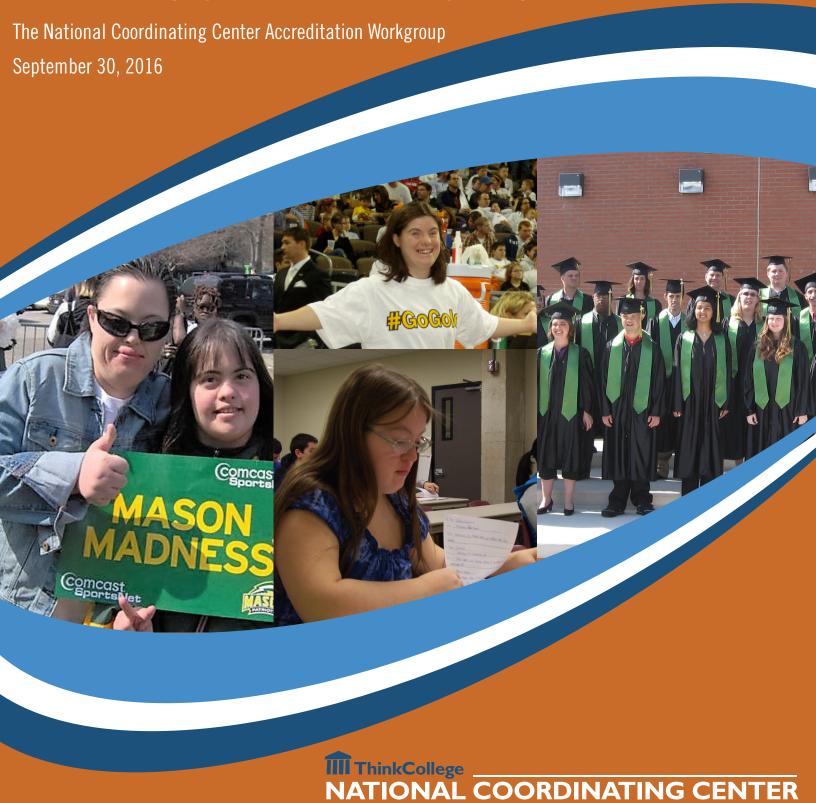# Report on Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: A Path to Education, Employment, and Community Living

The National Coordinating Center Accreditation Workgroup

September 30, 2016

ThinkCollege

NATIONAL COORDINATING CENTER

REPORT TO:

THE HONORABLE JOHN B. KING, JR., UNITED STATES SECRETARY OF EDUCATION
THE UNITED STATES SENATE COMMITTEE ON HEALTH, EDUCATION, LABOR AND PENSIONS
THE UNITED STATES HOUSE OF REPRESENTATIVES COMMITTEE ON EDUCATION AND THE WORKFORCE
NATIONAL ADVISORY COMMITTEE ON INSTITUTIONAL QUALITY AND INTEGRITY

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September 30, 2016

The Honorable John B. King, Jr.
Secretary of Education

Dear Mr. Secretary:

The National Coordinating Center Accreditation Workgroup is pleased to present this report: Model Accreditation Standards for Higher Education Programs for Students with Intellectual Disability: A Path to Education, Employment and Community Living.

This statutorily mandated report is submitted to you in accordance with requirements in the Higher Education Opportunity Act (HEOA) enacted in 2008, which authorizes federal financial aid for students with intellectual disability (ID), new model programs, and the National Coordinating Center (NCC). HEOA requires the National Coordinating Center to convene a workgroup of experts to develop model standards and identify the key components of higher education programs for students with ID. The Workgroup applauds Congress for including these critically important provisions in the Higher Education Act. I am grateful to Think College for their support and to the Workgroup members who volunteered for five years of research, public input, and effort culminating in this report.

The education, employment, and community outcomes for individuals with ID have historically been bleak in our country, with the vast majority living in poverty and relegated to subminimum wage jobs in sheltered workshops, or living at home with aging parents and little productive work or activites. Prior to 2008, a number of higher education programs for students with ID had sprung up around the country, but there was no federal financial aid or federally funded technical assistance, and there were no model programs to encourage the expansion of this important educational movement.

We now have 246 programs in the United States and new opportunities due to the HEOA. As colleges and universities open their doors to students with ID, these individuals are experiencing substantially better outcomes in employment, social engagement, and community living (Butler, Sheppard-Jones, Whaley, Harrison, & Osness, 2016; Grigal, Hart, Smith, Domin, Sulewski, & Weir, 2016; Hartz, 2014; Moore & Schelling, 2015).

A key to this success is the requirement in HEOA that students with ID must be included with nondisabled individuals in academic and employment settings. This is the first time in federal law that Congress has required that a student with disabilities be included a specific minimum percentage of time with nondisabled students and individuals. It is important to note that "this inclusion requirement is a floor, not a ceiling" (Will, 2013). Prior to the passage of HEOA 2008, many programs were primarily separate. Since HEOA passed in 2008, much progress has been made in inclusive course access, as well as inclusion in work experiences and in campus communities. Factors contributing to this success include the funding of model programs (Transition and Postsecondary Programs for Students with Intellectual Disabilities, or TPSIDs), technical assistance provided by the National Coordinating Center, and best practices such as the use of Universal Design for Learning principles, peer mentors and coaches for students in traditional courses, and the desire of programs to be approved for financial aid purposes. Further progress will be made as the accreditation standards are implemented.

Model accreditation standards will provide guidelines for colleges and universities on how to develop and improve programs, validate these programs within institutions of higher education, and give students and their families an assurance of quality. Accreditation standards will move the field forward on the path to real opportunities for students with ID to experience higher education resulting in competitive integrated employment and community living.

Respectfully,

Stephanie Smith Lee
Chair, National Coordinating Center Accreditation Workgroup

The same letter of transmittal was sent to the United States Senate Committee on Health, Education, Labor and Pensions; the United States House of Representatives Committee on Education and the Workforce; and the National Advisory Committee on Institutional Quality and Integrity.

ACKNOWLEDGEMENTS

EXECUTIVE SUMMARY

The Higher Education Opportunity Act (HEOA) enacted in 2008 created exciting opportunities for students with intellectual disability (ID) to access federal financial aid, and authorized both new model demonstration programs and a National Coordinating Center (NCC). The NCC, administered by Think College at the Institute for Community Inclusion at the University of Massachusetts Boston, is charged with providing technical assistance, coordination, and evaluation of model demonstration programs.

The NCC is also required by HEOA to convene a Workgroup to develop and recommend model criteria, standards, and components of higher education programs for students with intellectual disability. The National Coordinating Center Accreditation Workgroup issues this report in response to that statutory requirement.

The National Coordinating Center Accreditation Workgroup is composed of 15 members representing diverse expertise as required by Congress. From Fiscal Year (FY) 2011 through FY2016, the Workgroup consulted with experts, developed draft model accreditation standards, compared the draft standards to federal law and regulations, obtained public input, and finalized model accreditation standards for higher education programs for students with ID. This is the first time that accreditation for these programs has been addressed, and this undertaking will lead to oversight, accountability, and an expectation of continuous improvement.

Establishing accreditation standards will create benchmarks that will be useful for quality assurance and improvement of higher education programs enrolling students with intellectual disability. The model standards will be valuable for institutions of higher education, federal student aid offices, accrediting agencies, as well as students with ID and their parents. The implementation of model standards will validate and strengthen programs and provide guidelines for colleges and universities considering establishing high-quality programs.

A list of the model accreditation standards can be found on page 34 of this document. The list of standards contains a discussion, guidance, and "next steps" for each standard when appropriate.

The model accreditation standards represent five years of analysis, public input, and effort by the Workgroup. Model standards have been developed in each area required by the federal regulations for the development of accreditation standards ((20 U.S.C. §1140q(b)(5)).

> **The National Coordinating Center Accreditation Workgroup is composed of 15 members representing diverse expertise as required by Congress. From Fiscal Year (FY) 2011 through FY2016, the Workgroup consulted with experts, developed draft model accreditation standards, compared the draft standards to federal law and regulations, obtained public input, and finalized model accreditation standards for higher education programs for students with ID. This is the first time that accreditation for these programs has been addressed, and this undertaking will lead to oversight, accountability, and an expectation of continuous improvement.**

In addition, the Workgroup makes the following recommendations to the Department of Education:

- Consider the role of the Office of Federal Student Aid (FSA) approval process established for Comprehensive Transition Programs (CTPs), if any, once program accreditation is implemented.

- Provide guidance to school districts, comprehensive transition programs, and families about the determination of "intellectual disability" with respect to admissions, and the requirement that only

students with ID may receive financial aid under these provisions of the law. While this information is included in the HEOA Title IV regulations, there is some confusion about these issues.

- Support collaboration with and channels of communication among accreditation agencies and the Workgroup.

- Fund the development and dissemination of resources and strategies to use in determining what an individual student with ID is expected to learn, and how to assess progress in traditional courses, based on best practice. Such resources and strategies are needed to determine student progress in all areas (academic, career or technical, and independent living).

The next Workgroup convened by the National Coordinating Center will engage in the following activities:

- Transmit the report as required, and request briefings on the model standards for the Secretary of Education, Congressional committees, and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) .

- Broadly disseminate the report through presentations at conferences, meetings, and the Think College website (www.thinkcollege.net), and email a digital version to relevant organizations.

- Conduct outreach to accrediting agencies to share the report and ascertain interest in accreditation of Comprehensive Transition Programs.

- Develop a technical guidance document to support implementation of the model accreditation standards.

- Develop and implement a plan to work with the field on guidance and a protocol for implementing the standards.

- Research and consider feasibility of creating a new accrediting agency.

- Update recommendations for the model standards if needed due to field testing, public input, or any changes to the Higher Education Act or other relevant laws that could impact the standards, such as WIOA or IDEA.

This report and these standards reflect a significant step forward in creating not only authentic but also high-quality higher education opportunities for students with ID. The implementation of model accreditation standards will move us forward on the path to inclusive higher education opportunities that lead to competitive integrated employment and community living.

Model Accreditation Standards for Higher Education Programs for Students With Intellectual Disability

Mission Standard 1:
The mission is consistent with the Higher Education Opportunity Act requirements that the program "is a degree, certificate, or non-degree program at an accredited institution that is designed to support students with intellectual disabilities (ID) who are seeking to continue academic, career and technical, and independent living instruction in order to obtain" competitive integrated employment and/or further education.

Mission Standard 2:
The program has a written mission statement that guides activities, policies, program evaluation and allocation of resources. This statement is communicated to faculty, students, staff, prospective students, and the public, and is evaluated periodically.

Student Achievement Standard 1:
The program has an inclusive program of study that is consistent with its mission, admission requirements, and anticipated outcomes.

Student Achievement Standard 2:
The institution has established a Satisfactory Academic Progress policy that clearly states achievement standards and competencies and includes criteria for evaluating student progress and impact on student advancement.

Student Achievement Standard 3:
The program maintains and provides students with a written report at the end of each "academic unit" (semester, trimester, etc.), accessible to the student, that clearly indicates evidence of student progress.

Curriculum Standard 1:
The inclusive program of study aligns with the statutory and regulatory requirements for a Comprehensive Transition Program (CTP) in the Higher Education Act.

Curriculum Standard 2:
The program provides students with intellectual disability with access to a wide array of postsecondary level courses from multiple disciplines and departmental/college units that are part of the curriculum for degree or certificate programs.

Curriculum Standard 3:
The inclusive program of study is delivered to students physically attending the institution, but may include off-campus learning opportunities including internships, apprenticeships, or other work experiences. A limited number of courses may be delivered via distance learning, as long as the institution explains why it believes the course is applicable to, and benefits, students with intellectual disability.

Curriculum Standard 4:
The inclusive program of study includes instruction, work experiences and other activities necessary to enable students to achieve and sustain competitive integrated employment.

Curriculum Standard 5:
The program's materials and methodologies are accessible to all learners and are developed based on the principles of universal design for learning.

Curriculum Standard 6:
Provide support to ensure student engagement in campus life and enhance student development of social and independent living skills.

Faculty Standard 1:
Staff and other professionals have education and training commensurate with their roles and responsibilities and demonstrate an ongoing commitment to professional development.

Faculty Standard 2:
Other individuals who work with students, such as teachers in training, peer mentors and job coaches are selected, trained and supervised in alignment with existing IHE policies and consistent with the skill set required by the position.

Faculty Standard 3:
Program staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.

Faculty Standard 4:
Training and technical assistance are provided to the institution's faculty and staff to develop learning environments, courses and instruction according to the principles of universal design for learning.

Facility, Equipment and Supply Standards 1:
Students in the program have access to institutional facilities, consistent with other students, which support the achievement of their goals.

Administrative and Fiscal Capacity Standard 1:
The program is a part of a department or unit of the institution, with a recognized place within its administrative structure.

Administrative and Fiscal Capacity Standard 2:
The program has an administrative structure and an advisory committee that is effective in helping the program achieve its mission. The advisory committee includes a variety of stakeholders, including parents of alumni students with intellectual disability.

Administrative and Fiscal Capacity Standard 3:
The program identifies, encourages, and supports access to appropriate professional development activities that meet the needs of faculty, staff, administrators and other individuals working with the students.

Administrative and Fiscal Capacity Standard 4:
Administrative and support staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.

Administrative and Fiscal Capacity Standard 5:
Contracts, Memoranda of Understanding and partnership agreements with third parties are in compliance with applicable laws and in keeping with policies of the larger institution. Such documents align with the mission of the program, and are periodically reviewed.

Administrative and Fiscal Capacity Standard 6:
Financial resources are adequate and available to meet obligations to students, staff and other contractual parties.

Administrative and Fiscal Capacity Standard 7:
Programs have a viable plan for fiscal and programmatic sustainability.

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INTRODUCTION

The United States is at a pivotal point in the development of improved policies, best practices, and programs that will lead to significantly better life outcomes for people with intellectual disability (ID). There is considerable support for innovation that will produce these improved outcomes. The following recent legislative developments underscore Congress's commitment to improving the lives of individuals with ID:

- The Higher Education Opportunity Act of 2008 (HEOA) includes new provisions authorizing federal financial aid, new model demonstration programs, and a national coordinating center for students with ID. (See below for details.)

- The Stephen Beck, Jr., Achieving a Better Life Experience Act of 2014 (ABLE Act) allows individuals with disabilities and their families to create a tax-advantaged savings account to help cover expenses across the life span, including higher education, without jeopardizing important public benefits (ABLE National Resource Center, n.d.).

- The Workforce Innovation and Opportunity Act (WIOA) of 2014 "makes significant improvements in federal law for Americans with disabilities, including youth transitioning from education to employment, by helping to ensure that these individuals have opportunities to acquire the skills and training needed to maximize their potential and enter competitive integrated employment" (Advisory Committee on Increasing Competitive Integrated Employment for Individuals with Disabilities, 2016, p. 5). WIOA promotes competitive integrated employment and simultaneously reduces dependence on sheltered workshops and sub-minimum wage. The act also provides resources for capacity development and technical assistance, and requires funds to target youth in transition from school to work. This is particularly important for students with significant disabilities, for whom research has established that work-based learning experiences, especially paid jobs, are the strongest predictor of post-school employment (Luecking, 2016).
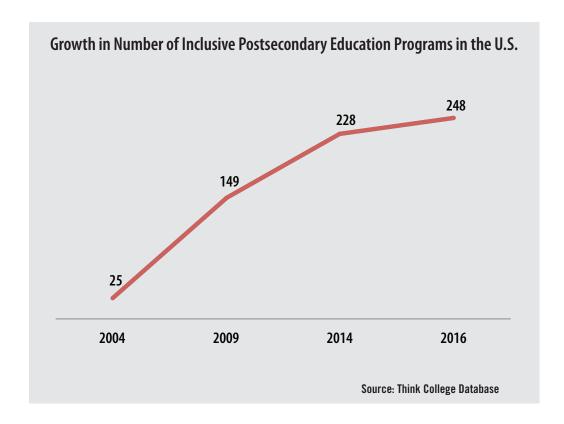
Essential to the successful implementation of these statutes is advancement in K-12 education. Improvements to the Individuals with Disabilities Education Act (IDEA) include requiring assessments for all students, the use of positive behavioral supports and access to the general curriculum. Funding for projects promoting the use of Universal Design for Learning principles that provide students with multiple means of representation, expression, and engagement, and funding to the Schoolwide Integrated Framework for Transformation (SWIFT) Center for technical assistance on inclusive practices (SWIFT, 2016), are underpinning improved implementation. Additionally, the reuthorization of the Elementary and Secondary Education Act in 2001 and 2015, requiring new accountability for the academic achievement of all students, is leading to an increased focus on the achievement of students with disabilities.

> The United States is at a pivotal point in the development of improved policies, best practices, and programs that will lead to significantly better life outcomes for people with intellectual disability (ID). There is considerable support for innovation that will produce these improved outcomes.

These actions represent a shift in Congressional mindset about the attainability of academic achievement, employment, and independent living for people with intellectual disability. As Congress developed these pieces of legislation, it sought to ensure alignment of these laws. In developing the model accreditation standards, the National Coordinating Center Workgroup was cognizant of this alignment, and the Workgroup sought to align the standards with the requirements of these statutes.

The legislative changes mentioned earlier have fostered the growth and development of new higher education opportunities for students with ID. The graph below illustrates the number of higher education programs for students with intellectual disability and the considerable increase in the last decade.

Growth in Number of Inclusive Postsecondary Education Programs in the U.S.

25	149	228	248
2004	2009	2014	2016

Source: Think College Database

Changes to the Higher Education Act Impacting Students with ID

At the urging of families, students, and professionals, the Higher Education Act (HEA), as amended in the 2008 Higher Education Opportunity Act (HEOA), contained several provisions aimed at increasing access to higher education for youth and adults with intellectual disability (ID). These key provisions are:

- **Federal Student Aid:** For the first time, students with intellectual disability are eligible to receive certain forms of federal student aid. (See details below.)
- **Model Demonstration Programs:** Transition and Postsecondary Programs for Students with Intellectual Disability (TPSIDs) were authorized to promote the successful transition of students with ID into higher education, and to enable institutes of higher education to create or expand high-quality inclusive model comprehensive transition and postsecondary programs for students with ID.
- **National Coordinating Center:** A national coordinating center was established to provide technical assistance, provide coordination between and evaluation of TPSID projects, and create recommended standards for programs.

During the reauthorization in 2008, Congress gave careful consideration to the definition of "student with an intellectual disability," which is defined for purposes of the HEA as follows:

The term "student with an intellectual disability" means a student—

(A) with a cognitive impairment, characterized by significant limitations in—

(i) intellectual and cognitive functioning; and

(ii) adaptive behavior as expressed in conceptual, social, and practical   adaptive skills; and

(B) who is currently, or was formerly, eligible for a free appropriate public education under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.]. (20 U.S.C. §1140 (2)).

Financial Aid and Program Definition

Students with intellectual disability are now eligible for federal financial aid (Pell Grants, Federal Supplemental Educational Opportunity Grants, and work-study jobs, but not loans) under certain conditions. The students must have exited high school, meet the definition of "intellectual disability" in HEOA, be enrolled in a comprehensive transition and postsecondary program for students with intellectual disability (CTP), and demonstrate financial need.

A CTP is defined in HEOA as follows:

(1) Comprehensive transition and postsecondary program for students with intellectual disabilities

The term "comprehensive transition and postsecondary program for students with intellectual disabilities" means a degree, certificate, or nondegree program that meets each of the following:

(A) Is offered by an institution of higher education.

(B) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment.

(C) Includes an advising and curriculum structure.

(D) Requires students with intellectual disabilities to participate on not less than a half-time basis as determined by the institution, with such participation focusing on academic components, and occurring through 1 or more of the following activities:

(i) Regular enrollment in credit-bearing courses with nondisabled students offered by the institution.

(ii) Auditing or participating in courses with nondisabled students offered by the institution for which the student does not receive regular academic credit.

(iii) Enrollment in noncredit-bearing, nondegree courses with nondisabled students.

(iv) Participation in internships or work-based training in settings with nondisabled individuals.

(E) Requires students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible.

(20 U.S.C. §1140 (1))

CTPs support students with intellectual disability who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education to prepare for gainful employment. An eligible CTP must meet the following requirements: physical attendance; academic, career, and independent living instruction; preparation for gainful employment; an advising and curriculum structure; and opportunities for students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible (20 U.S.C. 1091, 1140). These programs, as distinct from the TPSID model demonstration programs and National Coordinating Center, do not receive federal funding.

After HEOA 2008 was signed into law, the Department of Education conducted a Negotiated Rulemaking process, and published a Notice of Proposed Rulemaking Notice, as well as final regulations for Title IV of HEOA (34 CFR Parts 600, 601, 602, 668, 673, 674, 675, 682, 685, 686, 690, and 692; see www2.ed.gov/HEOA). The section on financial aid for students with ID provided further clarification on implementing this section of the law. For instance, the regulations specified how a student could be determined to meet the definition of a "student with an intellectual disability" if the student was not so identified under the Individuals with Disabilities Education Act (IDEA).

Although the law does not require an approval process for CTPs, the Department initiated an approval process administered by the Office of Federal Student Aid (FSA) in the U.S. Department of Education. Department officials stated at a negotiated rulemaking committee session and at a Workgroup meeting that the approval process was intended as an interim process that would be eliminated once model accreditation program standards are established and implemented.

Currently, the process to become an approved CTP involves the following:

The IHE financial aid administrator completes an e-application with input from a program representative. The program representative submits the following supporting documentation via e-mail:

- A detailed narrative description of how the CTP program meets all program eligibility requirements
- Satisfactory academic progress policy for CTP students
- Letter to accrediting agency

The review process for CTP applications includes an internal review conducted by FSA to check the application is fully completed and to determine adherence to basic HEA Title IV eligibility requirements (Bergeron, 2010). Following this, an external review of the applicant's narrative description is conducted to establish that clear explanations of all required elements are met. Finally, an additional external review by professionals in the field is conducted. In some cases, these external reviewers offer recommendations and, if needed, seek additional information.

The current process is aimed at determining whether programs are addressing regulatory requirements. It takes between 4-18 months to obtain approval once the application is submitted. Institutions can reapply if they are not initially approved. At this time, there is no mechanism for continued oversight of approved programs, and no process for determining the quality or to examine the outcomes of approved CTP programs.

The Office of Federal Student Aid website includes information on financial aid for students with ID and a list of approved programs: **https://studentaid.ed.gov/sa/eligibility/intellectual-disabilities**

Model Programs (TPSIDs)

Transition and Postsecondary Programs for Students with Intellectual Disabilities (TPSIDs) were authorized under HEOA to create or expand model programs at institutions of higher education (IHEs) or consortia. Since the statute does not require a CTP approval process, TPSIDs are not specifically required to go through the FSA approval process.

In awarding TPSID grants, the HEOA requires the Secretary of Education to provide for an equitable geographic distribution of grants and serve areas that are underserved by this type of program. The Secretary must also give preference to applicants that agree to incorporate one or more of the following: partnerships with relevant agencies, integration in student housing, and the involvement of students attending the institution studying related fields. IHEs must serve students with ID; provide individual supports and services for academic and social inclusion in academic courses, extracurricular activities, and other aspects of the IHE; and provide a focus on academic enrichment, socialization, independent living skills (including self-advocacy skills), and integrated work and career skills that lead to employment (20 U.S.C. §1140g(c)).

TPSID 2010–2015 Grantees

In FY2010, the Department awarded $10.5 million to 27 TPSID five-year grantees. These TPSID grants were implemented at 52 college and university campuses located in 23 states (U.S. Department of Education, 2010). The National Coordinating Center cooperative agreement was awarded to Think College at the Institute for Community Inclusion at the University of Massachusetts Boston.
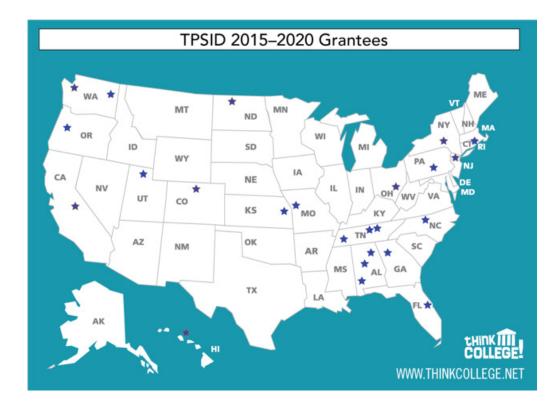
One of the responsibilities of the National Coordinating Center has been to provide technical assistance to and evaluation of the TPSID projects. An OMB-approved data collection tool was developed by the National Coordinating Center and used annually by TPSIDs to gather data on programs and students. Evaluation data from the first TPSID cohort has informed the work of the Workgroup. Annual reports of evaluation data from the first TPSID cohort can be found at: **http://www.thinkcollege.net/publications/annual-reports**

The data collected from the 2010-2015 TPSIDs by the Think College National Coordinating Center indicate that:

- 2,245 students attended programs at 52 campuses implementing 27 model demonstration grants
- Students enrolled in over 10,000 inclusive courses
- Overall, 45% of all course enrollments across the 5 years of data collection were in inclusive classes
- 846 students worked in a paid job while also attending the program
- Over 1,000 students earned a credential upon exiting (Grigal, Hart, Smith, Domin, & Weir, 2016)

Across the five years of the 2010–2015 TPSID grants, positive trends have emerged (Grigal et al., 2016). The percentage of inclusive classes taken by students with intellectual disability has increased from 38% of all course enrollments in FY2010 to 45% in FY2015, indicating that TPSID programs are providing greater access to typical college classes over time. A number of favorable exit outcomes have also been found. For example, the percentage of students who earned a credential at exit increased from 63% in FY2010 to 80% in FY2015. The percentage of students who were engaged in employment or career development within 90 days of program exit has increased from 30% in FY2010 to 76% in FY2015, and the percentage of students with a paid job within 90 days of exit rose to 40% in FY2015. The

TPSID 2015–2020 Grantees

WWW.THINKCOLLEGE.NET

findings related to the employment of students with ID during and after participating in higher education are particularly promising, given that 45% of employed students had never held a paid job prior to the TPSID program (Grigal, Hart, Smith, Domin, & Sulewski, 2013).

In FY 2015, $9.8 million was awarded in to 25 IHEs in 19 states to implement additional TPSID projects. Information about the 2015–2020 cohort of TPSIDs and the National Coordinating Center can be found at: **http://www2.ed.gov/programs/tpsid/awards.html**

Requirements for the Accreditation Workgroup

As part of its funding requirements in the FY2010–2015 funding cycle, the NCC was required to convene a workgroup to develop and recommend model criteria, standards, and components for higher education programs for students with ID.

Requirements for Accreditation Workgroup from HEOA (20 U.S.C. §1140q(b)(5)):

J) convene a workgroup to develop and recommend model criteria, standards, and components of such programs as described in subparagraph (E), that are appropriate for the development of accreditation standards, which workgroup shall include—

    (i) an expert in higher education;
    (ii) an expert in special education;
    (iii) a disability organization that represents students with intellectual disabilities;
    (iv) a representative from the National Advisory Committee on Institutional Quality and Integrity; and
    (v) a representative of a regional or national accreditation agency or association.

(E) develop recommendations for the necessary components of such programs, such as—

    (i) academic, vocational, social, and independent living skills;
    (ii) evaluation of student progress;
    (iii) program administration and evaluation;
    (iv) student eligibility; and
    (v) issues regarding the equivalency of a student's participation in such programs to semester, trimester, quarter, credit, or clock hours at an institution of higher education, as the case may be;

(6) REPORT.—Not later than five years after the date of the establishment of the coordinating center under this subsection, the coordinating center shall report to the Secretary, the authorizing committees, and the National Advisory Committee on Institutional Quality and Integrity on the recommendations of the workgroup described in paragraph (5)(J).

The NCC Accreditation Workgroup was established in 2012 and included volunteer members reflecting the required expertise (see page 13 for member listing).

The Accreditation Workgroup took the following steps to develop the standards:

1. Consulted with experts to better understand the accreditation process
2. Analyzed the relationship of model standards to existing law and regulations
3. Credential subcommittee work included:
    i. Surveyed TPSID program directors about credentialing
    ii. Reviewed policies and practices
    iii. Developed resources on credentials
4. Created draft accreditation standards
5. Obtained public input through presentations of draft standards and input sessions at conferences, via webinars, and through an online survey
6. Finalized standards based on public feedback and consultation with experts
7. Prepared report.

The next section describes in detail the work of the Accreditation Workgroup, including the process used to develop draft model accreditation standards, the methods used to obtain public input on the draft standards, and reflection and revision activities used to finalize the model standards.

THINK COLLEGE ACCREDITATION WORKGROUP

The Workgroup conducted quarterly meetings either in-person or via teleconference starting in March 2012. In FY2012, the meetings, analysis and research focused on researching the accreditation process, learning from experts at the Department of Education and the field, establishing an understanding of accreditation as it relates to programs for students with ID, and gaining insight into the relationship between accreditation and credentialing issues.

At the July 2012 in-person meeting, special guests included Jan Friis, Vice President for Government Affairs, Council for Higher Education Accreditation (CHEA); Kay Gilcher, former Accreditation Group Director, Office of Postsecondary Education, U.S. Department of Education; Carol Griffiths, former Executive Director, National Advisory Committee on Institutional Quality and Integrity (NACIQI); and Teresa O'Donnell, Executive Director, Commission on English Language Program Accreditation (CEA). These experts provided helpful insights regarding institutional accreditation vs. program accreditation, NACIQI, CHEA, CEA standards, how to develop and use program standards, accrediting agency recognition by the Department, the role of accreditation standards in federal financial aid, federal regulations governing accrediting agencies, and other topics.

Key points from these experts and research included:

- "Higher education accreditation in the United States is a complex maze involving recognition of institutional and programmatic accreditation. A wide range of national and regional accreditors review private, public, non-profit, and for-profit institutions and programs….Accreditation is one of the chief forms of external quality review of higher education. It is a nongovernmental process and differs from other external review processes in that it is essentially a peer evaluation. Decisions about quality are based on the review of evidence – including written reports from the institution or program being evaluated, as well as site visits and interviews – and on the judgments of informed experts. For the most part, accreditation standards are applied in the context of an institution's or program's mission" (CHEA, 2012).

For any accrediting agency to be recognized by the US Department of Education, the accreditation must be required for access to federal funding, such as grants or HEA Title IV financial aid. Information about accreditation and a list of recognized accrediting agencies may be found on the US Department of Education website at **http://www2.ed.gov/admins/finaid/accred/index.html.**

- The National Advisory Committee on Institutional Quality and Integrity (NACIQI) "provides recommendations regarding accrediting agencies that monitor the academic quality of postsecondary institutions and educational programs for federal purposes" (NACIQI, n.d.). NACIQI advises the "U.S. Secretary of Education on matters concerning accreditation, the Secretary's recognition process for accrediting agencies, and institutional eligibility for federal student aid, through the Committee's public meetings….NACIQI has also issued two policy reports in 2012 and 2015, hosted three forums, and listened to over two hundred public comments" (NACIQI, n.d.).

- Accrediting agencies evaluate the curriculum, academic quality, and other aspects of an institution or program based on the credentials or certificates offered. Periodic reviews are required, and typically include self-study, on-site team visits, a written team report, final decisions (with an appeal process), and ongoing monitoring. Institutional accreditation is primarily done by regional accrediting agencies, which have existed for a long time – some since the 1800s. Programmatic accreditation is handled by different accrediting agencies. About 40 programmatic accrediting agencies are recognized by the US Department of Education. Examples include the National League for Nursing Accrediting Commission, the American Bar Association, and the American Psychological Association.

- Accreditation is intended to ensure a sufficient level of quality to demonstrate to the public that the institution or program is of acceptable quality.

The Accreditation Workgroup is charged with developing voluntary model program accreditation standards for Comprehensive Transition Programs (CTPs). Once developed, one of the challenges will be to encourage one or more accrediting agencies to use the standards. There is no one "logical" program accreditor for CTPs, particularly given that CTPs are located in various places with an institution of higher education (IHE), such as general education or special education departments, the disability services office, continuing education, a University Center for Excellence in Developmental Disability (UCEDD), etc. Some experts have recommended starting a new agency to accredit these programs. However, that is potentially an expensive and complex process.

> **Model standards create quality benchmarks for programs that are useful to colleges, universities, students and parents. Standards will provide program validation and guidelines for colleges and universities who aim to establish high-quality programs.**

While there are questions about which agencies might use the model program standards, these standards will be important for a number of reasons. Model standards create quality benchmarks for programs that are useful to colleges, universities, students and parents. Standards will provide program validation and guidelines for colleges and universities who aim to establish high-quality programs.

The Development of Draft Accreditation Standards

In FY2013, the workgroup's primary focus was to develop draft model standards. During a series of teleconferences, the workgroup developed a set of draft standards, and carefully analyzed and compared the draft model standards to the U.S. Department of Education accreditation regulations (http://www2.ed.gov/admins/finaid/accred/index.html), the Commission on English Language Programs Accreditation (CEA) regulations (http://cea-accredit.org/about-cea/standards), the Think College Standards of Quality, Indicators and Benchmarks (http://www.thinkcollege.net/resources-database/item/t-110/1542), the Comprehensive Transition Program (CTP) laws and regulations, and the FSA approval process. (See Appendix A for comparison chart).

The Commission on English Language Acquisition (CEA) is a programmatic agency recognized by the Secretary. It accredits postsecondary, non-degree-granting English language programs and institutions. English Language Acquisition programs are located in stand-alone institutions and also, like higher education programs for students with ID, are located in various parts of institutions. For this reason, it was helpful to compare our draft standards to the CEA standards. (See http://www.cea-accredit.org.)
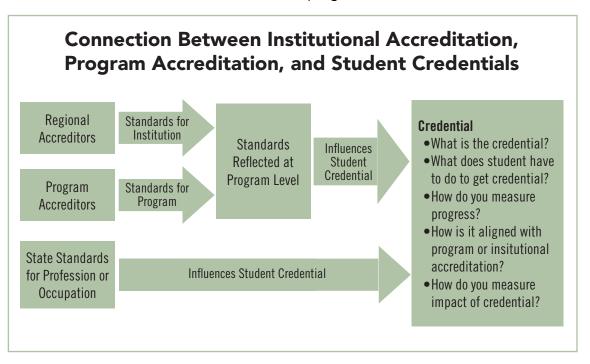
At the in-person meeting in Washington, DC on August 27, 2013, senior staff from the Department reviewed the Department's procedures for Comprehensive Transition Program (CTP) approval, and explained the gainful employment programs and current disclosure requirements. They provided clarification on several issues, including the Department's role in approving accreditation agencies. The Workgroup discussed these issues and reviewed the process for standards. The meeting concluded with planning public input on the draft model standards.

Developing Credentials

Program accreditation standards are influenced by the institutional standards imposed by regional accreditation processes. These program standards influence the credential offered by each particular program. Because of these connections, the Accreditation Workgroup developed credentialing resources as part of our work. The connection between institutional accreditation, program accreditation, and student credentials is shown in the figure on the right.

In 2012, the credential subcommittee, chaired by Judy Shanley, focused on three primary areas. First, the subcommittee analyzed results of an electronic survey conducted in the summer and fall of 2012. Program directors affiliated with the TPSID programs were asked questions regarding 1) whether they offer a credential to students who complete the program, 2) the

Connection Between Institutional Accreditation, Program Accreditation, and Student Credentials

Regional Accreditors → Standards for Institution

Program Accreditors → Standards for Program

Standards Reflected at Program Level → Influences Student Credential

State Standards for Profession or Occupation → Influences Student Credential

Credential
- What is the credential?
- What does student have to do to get credential?
- How do you measure progress?
- How is it aligned with program or insitutional accreditation?
- How do you measure impact of credential?

program's process for developing the credential, and 3) how this credential is aligned to other credentialing processes at the institution. Interviews were conducted with selected TPSID grantees to obtain additional information about their credential development process.

The subcommittee conducted research as the second major focus of its work. Subcommittee members examined policies and practices in place at institutions of higher education regarding credentials related to other programs of study. Especially noteworthy was emerging research and practice pertinent to experiential learning and competency-based learning. Along with members of the accreditation workgroup, subcommittee members and National Coordinating Center staff reviewed the application of these practices to students enrolled in higher education programs for students with ID.

Finally, the credential subcommittee compiled survey results and research findings into draft tools for TPSID grantees and the field. These materials provided program directors with information and resources to help them implement a credential that is meaningful to students as they exit higher education programs. The tools provide program directors with guidance regarding developing a credential, aligning the credentialing process with other institutional policies such as accreditation, and communicating information about the credential to institutional colleagues, families, students, and employers.

In FY 2014, the credentialing subcommittee completed their work and developed three resources related to credentials. The project published an Insight Brief titled *Credential Development in Inclusive Higher Education Programs Serving Students with Intellectual Disabilities*, a Fast Fact: *Current Status of Meaningful Credentials for Students with ID attending TPSID Programs*, and a *Credential Action Planning Tool for college programs to use when developing a meaningful, institution-affiliated credential for their students*. (see **http://www.thinkcollege.net/publications).**

Conducting Public Input on Draft Standards

In FY2014, the Workgroup finalized the draft model accreditation standards, developed a comprehensive plan for obtaining input on the draft standards from a wide variety of stakeholders, and conducted public input opportunities. The Workgroup met three times to finalize the draft standards, and members were involved in a number of public input sessions.

FY 2014 public input opportunities:

- A presentation and feedback session on the draft standards and the public input process at a pre-conference on inclusive higher education, prior to the Association of University Centers on Disabilities annual conference in Washington DC (November 2013).
- A presentation and input session at the National Down Syndrome Congress convention in Indiana (July 2014).
- A presentation and input session at the TPSID Project Directors Meeting in California (July 2014).
- A webinar with a public input opportunity (September 2014).

During FY2015, the Workgroup developed and widely distributed a survey on the draft standards. Two webinars shared information and instructions on how to participate in an online survey to provide input on the draft standards and offered an opportunity for discussion. Feedback was submitted via the online survey by 207 individuals from 36 states with a wide range of backgrounds, including higher education professionals, K-12 professionals, parents of people with intellectual disability, college students, and others. In addition, eight in-person sessions were held and feedback obtained from an additional 705 people for a total of 912 comments, over a period of two years. (See survey results and summary of input in Appendix C.)

Questions survey respondents and others at webinars and public input sessions were asked to consider:

- Are the standards clear?
- Should anything be changed?
- Have we missed anything?
- Do they reflect an acceptable level of quality?
- What should be included in the accompanying guidance?

FY 2015 public input opportunities:

- **Live webinars:** The accreditation process and the draft standards were explained on live webinars on October 6 and October 27, 2014. Eighty-five individuals representing a wide range of interests participated in the two webinars, which were also recorded and viewed later.
- **Survey:** The survey provided an opportunity to review and comment on each standard and provide specific suggestions. The 207 respondents from across the country included parents of students with ID, college students, K-12 professionals, higher education professionals, and others. (See Appendix B for survey results.)
- **National Down Syndrome Convention in June, 2015** in Arizona provided an opportunity for individual input and a focus group. Comments were received from 30 parents and students with Down syndrome.
- **State of the Art Conference on Postsecondary Education and Students with Intellectual Disabilities:** In November 2014, 120 CTP and TPSID program staff, higher education professionals, parents, students, and others provided feedback and recommendations on each draft model standard in a session presented by Accreditation Workgroup members.

Finalizing the Standards and Report

Public input reflected that the draft standards were generally considered clear and sufficient. However, wording changes were suggested to enhance clarity, and several revisions were recommended. Additionally, recommendations for guidance documentation were offered.

A number of commenters recommended that language from the HEOA law and regulations should be included in the guidance and that the definition of "competitive integrated employment" from the Workforce Innovation and Opportunity Act (WIOA) be included. The Workgroup agreed with this input and made those changes.

Many families expressed strong opinions about the standards, especially regarding the importance of inclusion, family engagement, the need for advice and individual support for students in a variety of areas (such as academics, career and work, campus life, housing, etc.), and family involvement in a program advisory committee. The Workgroup discussed issues regarding family involvement in considering several of the standards.

Families have been found to have strong support for students with ID attending higher education, but have reported a lack of information on viable options (Griffin, McMillan, & Hodapp, 2010; Martinez, Conroy, & Cerreto, 2012). The importance of family involvement in the post-school education for their young adults is substantiated in the Family Involvement in the Educational Development of Youth with Disabilities. A Special Topic Report from the National Longitudinal Transition Study-2 (NLTS2), which finds that "The importance of family involvement and expectations is supported by NLTS2 analyses. Parents' activities in support of their children's education is associated with consistent differences in several achievement domains, independent of disability, functioning, or other differences among youth….Many families will need to continue to assist their children beyond the secondary school years" (Newman, 2005, p. ES5-6).

Several commenters recommended that the standards use the term "developmental disability" instead of "intellectual disability." However, this contradicts HEOA, which uses the term "intellectual disability," which has a specific meaning that is different from the definition of the term "developmental disability." (See glossary for definition of "developmental disability.")

A comprehensive document was prepared that summarized the comments from the following: the National Down Syndrome Congress 2014 convention input session, the 2014 State of the Art Conference on Postsecondary Education and Individuals with Intellectual Disabilities input session, the 2013 AUCD preconference session, the webinars, comments shared at other events such as TPSID project directors meetings, survey results, and key comments from the survey not otherwise noted.

In FY2015 and FY2016, the Workgroup used this public input document as the basis for a series of teleconferences to carefully consider all public input, finalize the standards, and develop recommendations for the discussion sections, guidance, and next steps. Input from subject matter experts was sought and considered regarding a number of issues such as the accreditation process, the development of credentials and certificates, and higher education policies. After finalizing the standards, the Workgroup completed this report.

Next Steps

The model standards that are included in this report include "next steps" recommendations regarding specific standards. In addition, in September 2015, the National Coordinating Center cooperative agreement was once again awarded to Think College, and a new Workgroup will be convened for FY2016 – FY2020. Plans for the new Workgroup include the following:

- Transmit the report as required and request briefings on the model standards for the Secretary of Education, Congressional committees, and NACIQI.
- Broadly disseminate the report through presentations at conferences, meetings, and the Think College website: www.thinkcollege.net, and email an online version to relevant organizations.
- Conduct outreach to accrediting agencies to share the report and ascertain interest in accreditation of CTP programs.
- Develop a technical guidance document to support implementation of the model accreditation standards.
- Develop and implement a plan to work with the field on guidance and a protocol for implementing the standards.
- Research and consider feasibility of creating a new accrediting agency.
- Update recommendations for the model standards if needed due to working with the field, public input, or any changes to the Higher Education Act or other relevant laws that could impact the standards, such as WIOA or IDEA.

The Workgroup makes the following recommendations to the Department of Education:

- Consider the role of the FSA approval process for CTPs, if any, once program accreditation is implemented.
- Provide guidance to school districts, comprehensive transition programs, and families about the determination of "intellectual disability" with respect to admissions, and the requirement that only students with ID may receive financial aid under these provisions of the law. While this information is included in the HEOA Title IV regulations, there is some confusion about these issues.
- Support collaboration with and channels of communication among accreditation agencies and the Workgroup.
- Fund the development and dissemination of resources and strategies to use in determining what an individual student with ID is expected to learn, and how to assess progress in traditional courses, based on best practice. Such resources and strategies are needed to determine student progress in all areas (academic, career or technical, and independent living).

Finally, the Workgroup suggests the following next steps related to specific standards:

- Develop guidance regarding situations in which staff work for an outside entity, such as a non-profit organization or school systems.
- Further research on the impact of student status on access to facilities, how the accreditation process affects this issue, and best-practice guidelines.
- Develop guidance for advisory group membership, roles, and responsibilities, including the meaningful engagement of parents and students with intellectual disability.
- Develop informational materials and strategies to support the development of fiscal sustainability plans.
- Address what period of time should be considered "reasonable" to retain records related to eligibility for federal student aid and admissions.
- Develop recommendations about the various types of academic and non-academic advising that are important to students, and options for how such advising should be provided and by whom.
- Seek clarification on the role of guardianship with respect to the Family Educational Rights and Privacy Act (FERPA).
- Conduct further research on the impact of student status on access and participation in services and social and recreational activities, how the accreditation process affects this issue, and best-practice guidelines.

MODEL ACCREDITATION STANDARDS FOR HIGHER EDUCATION PROGRAMS FOR STUDENTS WITH INTELLECTUAL DISABILITY

Introduction

In FY2011, a Workgroup on accreditation for higher education programs for students with intellectual disability (ID) was convened by the National Coordinating Center at Think College, University of Massachusetts Boston. As required by the Higher Education Opportunity Act (HEOA) of 2008, the Workgroup was charged with developing model standards that could be used for accreditation of inclusive higher education programs for students with ID.

The Accreditation Workgroup was comprised of fifteen members representing diverse expertise as required by the HEOA (2008). The Workgroup consulted with experts, developed draft model accreditation standards, compared the draft standards to federal law and regulations, obtained public input, and finalized model accreditation standards for higher education programs for students with ID.

The Model Accreditation Standards are presented below, along with discussion, guidance, and next steps. A new Workgroup will be convened by Think College in 2016 to disseminate and conduct outreach around the standards, develop a technical guidance document to support implementation, develop and implement a plan to work with the field on guidance and a protocol for implementing the standards, and update the standards as needed based on working with the field, public input, and changes to any applicable laws.

Model Accreditation Standards

Mission Standard 1:

The mission is consistent with the Higher Education Opportunity Act requirements that the program "is a degree, certificate, or non-degree program at an accredited institution that is designed to support students with intellectual disabilities (ID) who are seeking to continue academic, career and technical, and independent living instruction in order to obtain" competitive integrated employment and/or further education.

- **Discussion:** The Higher Education Opportunity Act of 2008 (HEOA) uses the term "gainful employment." However the Department no longer requires Comprehensive Transition Programs (CTPs) to follow gainful employment program rules. In order to align with the Workforce Innovation and Opportunity Act (WIOA), the term "gainful employment" is changed to "competitive integrated employment" in this and other standards.

- **Guidance:** The term "competitive integrated employment" is used as defined in the Workforce Innovation and Opportunity Act (WIOA), as follows:

  The term "competitive integrated employment" has the meaning given the term in section 7 of the Rehabilitation Act of 1973 (29 U.S.C. 705), for individuals with disabilities. (29 U.S.C. §3102 (11))

  From the Rehabilitation Act of 1973: The term "competitive integrated employment" means work that is performed on a full-time or part-time basis (including self-employment)-

  (A) for which an individual-

(i) is compensated at a rate that-

(I)(aa) shall be not less than the higher of the rate specified in section 206(a)(1) of this title or the rate specified in the applicable State or local minimum wage law; and

(bb) is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; or

(II) in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and

(ii) is eligible for the level of benefits provided to other employees;

(B) that is at a location where the employee interacts with other persons who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons; and

(C) that, as appropriate, presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.

(29. U.S.C. §705 (5))

Mission Standard 2:
The program has a written mission statement that guides activities, policies, program evaluation and allocation of resources. This statement is communicated to faculty, students, staff, prospective students, and the public, and is evaluated periodically.

Student Achievement Standard 1:
The program has an inclusive program of study that is consistent with its mission, admission requirements, and anticipated outcomes.

- **Guidance:** An "inclusive program of study" refers to the courses, expectations and requirements needed for program completion. It must meet the HEOA requirements for a Comprehensive Transition Program, including meeting the definition of a student with an intellectual disability. (See Student Services Standard 1.) An individual student's course of study within the program will be determined through a person-centered plan.

Student Achievement Standard 2:
The institution has established a Satisfactory Academic Progress policy that clearly states achievement standards and competencies and includes criteria for evaluating student progress and impact on student advancement.

- **Guidance:** The range of standards and competencies must address academic, career or technical, and independent living areas as provided in the HEOA.
- **Next Steps**: We recommend that the U. S. Department of Education fund the development and dissemination of resources and strategies to use in determining what an individual student with ID is expected to learn, and how to assess progress in traditional classes, based on best practice. Such resources and strategies are needed to determine student progress in all areas (academic, career or technical, and independent living).

Student Achievement Standard 3:
The program maintains and provides students with a written report at the end of each "academic unit" (semester, trimester, etc.), accessible to the student, that clearly indicates evidence of student progress.

Curriculum Standard 1:
The inclusive program of study aligns with the statutory and regulatory requirements for a Comprehensive Transition Program (CTP) in the Higher Education Act.

- **Guidance:** *The CTP requirements in the HEOA regulations must be adhered to and are as follows:*

  (1) Comprehensive transition and postsecondary program for students with intellectual disabilities

  The term "comprehensive transition and postsecondary program for students with intellectual disabilities" means a degree, certificate, or non-degree program that meets each of the following:

  (A) Is offered by an institution of higher education.

  (B) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment.

  (C) Includes an advising and curriculum structure.

  (D) Requires students with intellectual disabilities to participate on not less than a half-time basis as determined by the institution, with such participation focusing on academic components, and occurring through 1 or more of the following activities:

  (i) Regular enrollment in credit-bearing courses with nondisabled students offered by the institution.

  (ii) Auditing or participating in courses with nondisabled students offered by the institution for which the student does not receive regular academic credit.

  (iii) Enrollment in noncredit-bearing, nondegree courses with nondisabled students.

  (iv) Participation in internships or work-based training in settings with nondisabled individuals.

  (E) Requires students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible.

  (20 U.S.C. §1140 (1))

Curriculum Standard 2:
The program provides students with intellectual disability with access to a wide array of postsecondary level courses from multiple disciplines and departmental/college units that are part of the curriculum for degree or certificate programs.

Curriculum Standard 3:
The inclusive program of study is delivered to students physically attending the institution, but may include off-campus learning opportunities including internships, apprenticeships, or other work experiences. A limited number of courses may be delivered via distance learning, as long as the institution explains why it believes the course is applicable to, and benefits, students with intellectual disability.

- **Discussion:** The definition of a Comprehensive Transition Program(CTP) in the HEOA regulations include a program that: "(2) Is delivered to students physically attending the institution";

- **Guidance:** The CTP requirements in the HEOA regulations must be adhered to. The expectations with respect to "physical attendance" are outlined in the Notice of Proposed Rulemaking for the HEOA regulations which states the following under the "Definition of a Comprehensive Transition and Postsecondary Program (Sec. 668.231)":

  Proposed Regulations: Proposed Sec.668.231 would define a comprehensive transition and postsecondary program by incorporating the statutory provisions, but would add a provision that the program would have to be delivered to students physically attending the institution.

  The proposed regulations would also clarify that the program must provide opportunities for students with intellectual disability to participate in coursework and other activities with students without disabilities.

  Reasons: Proposed Sec. 668.231 would incorporate the statutory requirements from section 760 of the HEA except for the proposed addition and clarification described in the preceding Proposed Regulations section. Some of the non-Federal negotiators initially opposed the proposed requirement that a comprehensive transition and postsecondary program must be delivered to students physically attending the institution. The negotiators argued that students should have the option of taking distance courses because they might be unable to commute to a campus or because some courses might only be offered online. Other negotiators and experts in the field argued that Congress intended for students with intellectual disability to be integrated into campus life as much as possible and did not want to allow distance education to be the sole or main delivery method.

  The Department does not wish to regulate to preclude all distance courses for students with intellectual disability and may permit a limited number of courses to be delivered via distance, as long as the institution explains why it believes the course is applicable to, and benefits, students with intellectual disability. Similarly, we wish to clarify that a comprehensive transition and postsecondary program may include an internship for students or other activities that are located off-campus--the physically-attending requirement does not exclude these activities.

Curriculum Standard 4:
The inclusive program of study includes instruction, work experiences and other activities necessary to enable students to achieve and sustain competitive integrated employment.

Curriculum Standard 5:
The program's materials and methodologies are accessible to all learners and are developed based on the principles of universal design for learning.

- **Guidance:** While programs are not in a position to require higher education faculty to deliver instruction in any particular manner, materials and methodologies delivered by the program must meet this standard. For information on the principles of universal design for learning see www. udlcenter.org or **http://udloncampus.cast.org/home#.VgWtcOm4nx4**

Curriculum Standard 6:
Provide support to ensure student engagement in campus life and enhance student development of social and independent living skills.

Faculty Standard 1:
Staff and other professionals have education and training commensurate with their roles and responsibilities and demonstrate an ongoing commitment to professional development.

Faculty Standard 2:

Other individuals who work with students, such as teachers in training, peer mentors and job coaches are selected, trained and supervised in alignment with existing IHE policies and consistent with the skill set required by the position.

- **Guidance:** Such selection, training and supervision shall be consistent with standards that apply to other programs at the institution and aligned with the institution's policies and practices as much as possible.

Faculty Standard 3:

Program staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.

- **Next Steps:** Develop guidance regarding situations in which staff work for an outside entity such as a non-profit organization or school system.

Faculty Standard 4:

Training and technical assistance are provided to the institution's faculty and staff to develop learning environments, courses and instruction according to the principles of universal design for learning.

- **Guidance:** For information on the principles of universal design for learning see www.udlcenter.org or **http://udloncampus.cast.org/home#.VgWtcOm4nx4**

Facility, Equipment and Supply Standards 1:

Students in the program have access to institutional facilities, consistent with other students, which support the achievement of their goals.

- **Discussion:** Public input demonstrated strong support for maximum access to facilities, however there was also concern that an otherwise good program should not be denied accreditation if there are a just a few exceptions to full access. The issue of how the student's status (degree, non-degree, certificate, continuing education, etc.) may affect access to facilities is somewhat unclear. This is an area that will require further exploration and a more concise standard in the future.
- **Next Steps:** Further research is needed on the impact of student status on access to facilities, how the accreditation process affects this issue, and best-practice guidelines.

Administrative and Fiscal Capacity Standard 1:

The program is a part of a department or unit of the institution, with a recognized place within its administrative structure.

Administrative and Fiscal Capacity Standard 2:

The program has an administrative structure and an advisory committee that is effective in helping the program achieve its mission. The advisory committee includes a variety of stakeholders, including parents of alumni students with intellectual disability.

- **Guidance:** In addition to a variety of stakeholders, including parents of alumni students with ID, serving on the advisory committee, the program must have a demonstrated process for soliciting and using stakeholder input, including input from current and former students and parents. The program must show how the input impacts program practices, or how family input is addressed if not implemented.
- **Next Steps:** Develop guidance for advisory group membership, roles and responsibilities, including the meaningful engagement of parents and students with intellectual disability.

Administrative and Fiscal Capacity Standard 3:

The program identifies, encourages, and supports access to appropriate professional development activities that meet the needs of faculty, staff, administrators and other individuals working with the students.

Administrative and Fiscal Capacity Standard 4:

Administrative and support staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.

Administrative and Fiscal Capacity Standard 5:

Contracts, Memoranda of Understanding and partnership agreements with third parties are in compliance with applicable laws and in keeping with policies of the larger institution. Such documents align with the mission of the program, and are periodically reviewed.

- **Guidance:** Applicable laws may include the HEA, WIOA, Individuals with Disabilities Education Act, or other laws.

Administrative and Fiscal Capacity Standard 6:

Financial resources are adequate and available to meet obligations to students, staff and other contractual parties.

Administrative and Fiscal Capacity Standard 7:

Programs have a viable plan for fiscal and programmatic sustainability.

- **Guidance:** Sustainability plans must be periodically reviewed and updated as needed.
- **Next Steps:** Develop informational materials and strategies to support the development of sustainability plans

Student Services Standard 1:

Admissions policies are consistent with program objectives and with the mission of the program and are implemented by properly trained individuals. The policies meet the criteria for Comprehensive Transition Programs (CTPs) in the Higher Education Act (HEA).

- **Discussion:** There is a growing concern that staff at some institutions may not understand the provisions in the HEOA law and regulations and/or may not be following the provisions with respect to the definition of a student with an intellectual disability. Consequently, there are concerns that it may be difficult for students who have an intellectual disability to gain admittance to some programs.

  At USC› Title 20 › Chapter 28 › Subchapter IV › Part F-1 › § 1091

  SC § 1091 - Student eligibility the law defines "a student with an intellectual disability" as follows:

  The term "student with an intellectual disability" means a student-

  (A) with a cognitive impairment, characterized by significant limitations in-

  (i) intellectual and cognitive functioning; and

  (ii) adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and

  (B) who is currently, or was formerly, eligible for a free appropriate public education under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.]. (20 U.S.C. §1140 (2))

The HEOA regulations, under Authority: 20 U.S.C. 1088, 1099c, 1141) PART 668—STUDENT ASSISTANCE GENERAL PROVISIONS, § 668.233 *Student eligibility,* describe the responsibility of the institution in determining if the student is, or was, eligible for special education and related services under IDEA, and how to determine if the student has an intellectual disability if the student was not so identified under IDEA:

> *(c) The institution obtains a record from a local educational agency that the student is or was eligible for special education and related services under the IDEA. If that record does not identify the student as having an intellectual disability, as described in paragraph (1) of the definition of a student with an intellectual disability in § 668.231, the institution must also obtain documentation establishing that the student has an intellectual disability, such as—*

> *(1) A documented comprehensive and individualized psycho-educational evaluation and diagnosis of an intellectual disability by a psychologist or other qualified professional; or*

> *(2) A record of the disability from a local or State educational agency, or*

> *government agency, such as the Social Security Administration or a vocational rehabilitation agency, that identifies the intellectual disability.*

> *(Approved by the Office of Management and Budget under control number 1845–NEW4) (Authority: 20 U.S.C. 109)*

> *In the discussion section of the regulations, further clarification is provided:*

> *In the preamble to the NPRM, the Department stated that an institution, as the party responsible for determining students' eligibility for the Federal Pell, FSEOG, and FWS programs, would be allowed to accept the most recent documentation, even if it is more than a few years old. To further clarify, we do not believe it is appropriate to require in these regulations that the documentation submitted by the student have a minimum or maximum age, as long as the information used is the best available under the circumstances.*

- **Guidance:** Institutions must adhere to the statutory and regulatory requirements regarding the definition of a student with an intellectual disability, keep records documenting that they have done so for a reasonable period of time, and provide such evidence to an accrediting agency. If the records for a student being considered for admission from an agency to do not document that the student has been identified as a student with an intellectual disability, then personnel reviewing other documentation must be qualified to do so.
- **Next steps:** Address what period of time should be considered "reasonable" to retain records.

Student Services Standard 2:
The program provides access to academic, employment and other advising, based on person-centered planning and in collaboration with existing institutional services.

- **Next Steps:** Develop recommendations about the various types of academic and non-academic advising that is important to students and options for how such advising should be provided and by whom.

Student Services Standard 3:
Families and students are included in the institution's general orientation programs and additional orientation is provided as needed.

Student Services Standard 4:
The program has a stated process for family engagement and communication that reflects clearly defined roles and responsibilities for parents, and staff, adheres to the Family Educational Rights and Privacy Act

(FERPA). Students and families are informed about FERPA requirements, student control over parental involvement, and the option for students to waive FERPA requirements and how to do so.

- **Next Steps:** Seek clarification on the role of guardianship with respect to FERPA.

Student Services Standard 5:
Students in the program have access to services, social and recreational activities, consistent with other students, which support the achievement of their goals.

- **Discussion:** Public input demonstrated strong support for maximum access and involvement in all services, co-curricular activities, social and recreational activities. Inclusion (with support) in services and social and recreational activities is a key component of these programs. However, there was also concern that an otherwise good program should not be denied accreditation if there are a just a few exceptions to full access. The issue of how the student's status (degree, non-degree, certificate, continuing education, etc.) may affect access to facilities is somewhat unclear. It was also noted that certain NCAA athletic teams, fraternities and sororities have national rules that prohibit non-degree students from participating. This is an area that will require further exploration and a more concise standard in the future.

- **Next Steps:** Further research is needed on the impact of student status on access and participation in services and social and recreational activities, how the accreditation process affects this issue, and best-practice guidelines.

Student Services Standard 6:
Provide supports designed to enable students to seek and sustain competitive, integrated employment.

Length and Structure of Program of Study Standard 1:
The program aligns with the college calendar and specifies the number of weeks of instructional time and the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities.

Length and Structure of Program of Study Standard 2:
The program clearly describes the educational credential offered (*e.g.*, degree, certificate, or non-degree credential) and identified outcome or outcomes established by the institution for all students with intellectual disability enrolled in the program. The program clearly specifies how students' progress through a full course of study and maintain satisfactory academic progress.

Student Complaints Standard 1:
The institution's grievance procedures are made accessible to students in the program. Support is available to students who seek to lodge a formal written complaint and is available throughout the grievance process.

Program Development, Planning, and Review Standard 1:
The program, along with its advisory group, regularly evaluates its program components, student assessment practices, student services, policies, activities and outcomes. The program implements program revisions based on the evaluation.

Program Development, Planning, and Review Standard 2:
The program provides information to the institution required for compliance with Title IV of the Act and maintains a record of compliance with the institution's program responsibilities.

Program Development, Planning and Review Standard 3:

Program staff verify that students who receive financial aid meet the definition of a student with an intellectual disability in the HEOA, including obtaining a record from a local educational agency that the student is or was found eligible for special education or related services under IDEA. If the record does not identify the student as having an intellectual disability, then the program must obtain documentation as described in the HEA regulations.

- **Discussion:** Concern is being raised, particularly by family organizations, that some programs are limiting admissions to CTPs to students who do not have an intellectual disability. The background for Student Services Standard 1 provides information on this topic, the law and regulations.

- **Guidance:** Only students with an intellectual disability may receive financial aid under the CTP provisions of the HEOA. Institutions must retain records for a reasonable period of time and provide evidence to accrediting agencies that only students with an intellectual disability receive Title IV aid under the HEOA provisions for students with intellectual disability.

- **Next Steps:** Address what period of time should be considered "reasonable" to retain records.

Program Development, Planning and Review Standard 4:

The program has provided a copy of the letter or notice sent to the institutions accrediting agency informing the agency of its CTP program, including information required by the HEOA regulations.

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GLOSSARY

Access	For purposes of these standards, "access" means full participation with individual supports.
Institution of Higher Education (IHE)	From HEOA §1001. General definition of institution of higher education (an) Institution of higher education For purposes of this chapter, other than subchapter IV, the term "institution of higher education" means an educational institution in any State that- (1) admits as regular students only persons having a certificate of graduation from a school providing secondary education, or the recognized equivalent of such a certificate, or persons who meet the requirements of section 1091(d) of this title; (2) is legally authorized within such State to provide a program of education beyond secondary education; (3) provides an educational program for which the institution awards a bachelor's degree or provides not less than a 2-year program that is acceptable for full credit toward such a degree, or awards a degree that is acceptable for admission to a graduate or professional degree program, subject to review and approval by the Secretary; (4) is a public or other nonprofit institution; and (5) is accredited by a nationally recognized accrediting agency or association, or if not so accredited, is an institution that has been granted preaccreditation status by such an agency or association that has been recognized by the Secretary for the granting of preaccreditation status, and the Secretary has determined that there is satisfactory assurance that the institution will meet the accreditation standards of such an agency or association within a reasonable time. (20 U.S.C. §1001(a)) (b) Additional institutions included For purposes of this chapter, other than subchapter IV, the term "institution of higher education" also includes- (1) any school that provides not less than a 1-year program of training to prepare students for gainful employment in a recognized occupation and that meets the provision of paragraphs (1), (2), (4), and (5) of subsection (a) of this section; and (2) a public or nonprofit private educational institution in any State that, in lieu of the requirement in subsection (a)(1), admits as regular students individuals- (A) who are beyond the age of compulsory school attendance in the State in which the institution is located; or (B) who will be dually or concurrently enrolled in the institution and a secondary school. (20 U.S.C. §1001(b))

Competitive integrated employment	From WIOA
	The term "competitive integrated employment" has the meaning given the term in section 7 of the Rehabilitation Act of 1973 (29 U.S.C. 705), for individuals with disabilities. (29 U.S.C. §3102 (11))
	From the Rehabilitation Act of 1973: The term "competitive integrated employment" means work that is performed on a full-time or part-time basis (including self-employment)-
	(A) for which an individual-
	(i) is compensated at a rate that-
	(I)(aa) shall be not less than the higher of the rate specified in section 206(a)(1) of this title or the rate specified in the applicable State or local minimum wage law; and
	(bb) is not less than the customary rate paid by the employer for the same or similar work performed by other employees who are not individuals with disabilities, and who are similarly situated in similar occupations by the same employer and who have similar training, experience, and skills; or
	(II) in the case of an individual who is self-employed, yields an income that is comparable to the income received by other individuals who are not individuals with disabilities, and who are self-employed in similar occupations or on similar tasks and who have similar training, experience, and skills; and
	(ii) is eligible for the level of benefits provided to other employees;
	(B) that is at a location where the employee interacts with other persons who are not individuals with disabilities (not including supervisory personnel or individuals who are providing services to such employee) to the same extent that individuals who are not individuals with disabilities and who are in comparable positions interact with other persons; and
	(C) that, as appropriate, presents opportunities for advancement that are similar to those for other employees who are not individuals with disabilities and who have similar positions.
	(29. U.S.C. §705 (5))

CTP	From HEOA
	(1) Comprehensive transition and postsecondary program for students with intellectual disabilities
	The term "comprehensive transition and postsecondary program for students with intellectual disabilities" means a degree, certificate, or nondegree program that meets each of the following:
	(A) Is offered by an institution of higher education.
	(B) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment.
	(C) Includes an advising and curriculum structure.
	(D) Requires students with intellectual disabilities to participate on not less than a half-time basis as determined by the institution, with such participation focusing on academic components, and occurring through 1 or more of the following activities:
	(i) Regular enrollment in credit-bearing courses with nondisabled students offered by the institution.
	(ii) Auditing or participating in courses with nondisabled students offered by the institution for which the student does not receive regular academic credit.
	(iii) Enrollment in noncredit-bearing, nondegree courses with nondisabled students.
	(iv) Participation in internships or work-based training in settings with nondisabled individuals.
	(E) Requires students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible.
	(20 U.S.C. §1140 (1))

TPSID	From HEOA. A model comprehensive transition and postsecondary programs for students with intellectual disabilities (TPSID) grant awarded by the U.S. Department of Education on a competitive basis to institutions of higher education (or consortia of institutions of higher education) that:
	(d) (1) serves students with intellectual disabilities;
	(2) provides individual supports and services for the academic and social inclusion of students with intellectual disabilities in academic courses, extracurricular activities, and other aspects of the institution of higher education's regular postsecondary program;
	(3) with respect to the students with intellectual disabilities participating in the model program, provides a focus on-
	(A) academic enrichment;
	(B) socialization;
	(C) independent living skills, including self-advocacy skills; and
	(D) integrated work experiences and career skills that lead to gainful employment;
	(4) integrates person-centered planning in the development of the course of study for each student with an intellectual disability participating in the model program;
	(5) participates with the coordinating center established under section 1140q(b) of this title in the evaluation of the model program;
	(6) partners with one or more local educational agencies to support students with intellectual disabilities participating in the model program who are still eligible for special education and related services under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.], including the use of funds available under part B of such Act [20 U.S.C. 1411 et seq.] to support the participation of such students in the model program;
	(7) plans for the sustainability of the model program after the end of the grant period; and
	(8) creates and offers a meaningful credential for students with intellectual disabilities upon the completion of the model program.
	(20 U.S.C. §1140g)
Student with an intellectual disability	From HEOA
	The term "student with an intellectual disability" means a student-
	(A) with a cognitive impairment, characterized by significant limitations in-
	(i) intellectual and cognitive functioning; and
	(ii) adaptive behavior as expressed in conceptual, social, and practical adaptive skills; and
	(B) who is currently, or was formerly, eligible for a free appropriate public education under the Individuals with Disabilities Education Act [20 U.S.C. 1400 et seq.]. (20 U.S.C. §1140 (2))

Developmental Disability Definition	From the Developmental Disabilities Assistance and Bill of Rights Act
	The term "developmental disability" means a severe, chronic disability of an individual that-
	(i) is attributable to a mental or physical impairment or combination of mental and physical impairments;
	(ii) is manifested before the individual attains age 22;
	(iii) is likely to continue indefinitely;
	(iv) results in substantial functional limitations in 3 or more of the following areas of major life activity:
	(I) Self-care.
	(II) Receptive and expressive language.
	(III) Learning.
	(IV) Mobility.
	(V) Self-direction.
	(VI) Capacity for independent living.
	(VII) Economic self-sufficiency; and
	(v) reflects the individual's need for a combination and sequence of special, interdisciplinary, or generic services, individualized supports, or other forms of assistance that are of lifelong or extended duration and are individually planned and coordinated.
	(42 U.S.C. §15002 (8)(A))
Inclusion	From the Developmental Disabilities Assistance and Bill of Rights Act:
	The term "inclusion", used with respect to individuals with developmental disabilities, means the acceptance and encouragement of the presence and participation of individuals with developmental disabilities, by individuals without disabilities, in social, educational, work, and community activities, that enables individuals with developmental disabilities to-
	(A) have friendships and relationships with individuals and families of their own choice;
	(B) live in homes close to community resources, with regular contact with individuals without disabilities in their communities;
	(C) enjoy full access to and active participation in the same community activities and types of employment as individuals without disabilities; and
	(D) take full advantage of their integration into the same community resources as individuals without disabilities, living, learning, working, and enjoying life in regular contact with individuals without disabilities.
	(42 U.S.C. §15002 (15))

APPENDIX

Appendix A: Chart comparing draft standards to law, regulations, etc.

Appendix B: Summary of Input on Model Accreditation Standards

Appendix C: Public Input Survey Results

APPENDIX A

Working Document: Comparison of draft standards to federal accreditation regulations, CEA standards, Think College Standards and Quality Indicators, HEOA law and regulations, and ED's CTP approval process.

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(a)The agency must demonstrate that it has standards for accreditation, and preaccreditation, if offered, that are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits. The agency meets this requirement if-				
(1)The agency's accreditation standards effectively address the quality of the institution or program in the following areas: Mission	Mission Standard 1: The program or language institution has a written statement of its mission and goals, which guides activities, policies, and allocation of resources. This statement is communicated to faculty, students, and staff, as well as to prospective students, student sponsors, and the public, and is evaluated periodically.	Mission Standard 1: The mission reflects that the program is a degree, certificate, or non-degree program at an accredited IHE that is designed to support students with ID who are seeking to continue academic, career and technical, and independent living instruction in order to obtain integrated competitive employment and/or continued education. Mission Standard 2: The program has a written statement of its mission and goals, that is measurable and guides activities, policies, program evaluation and allocation of resources. This statement is communicated to faculty, students, and staff, as well as to prospective students, and the public, and is evaluated periodically.	TC Standard 8: Ongoing Evaluation Quality Indicator 8.1: Conduct evaluation of services and outcomes on a regular basis.	(LAW) The term "comprehensive transition and postsecondary program for students with intellectual disabilities" means a degree, certificate, or nondegree program that meets each of the following: (A) Is offered by an institution of higher education. (B) Is designed to support students with intellectual disabilities who are seeking to continue academic, career and technical, and independent living instruction at an institution of higher education in order to prepare for gainful employment.

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(i)Success with respect to student achievement in relation to the institution's mission, which may include different standards for different institutions or programs, as established by the institution, including, as appropriate, consideration of course completion, State licensing examination, and job placement rates.	Student Achievement Standard 1: The program or language institution has a placement system that is consistent with its admission requirements and allows valid and reliable placement of students into levels.	Student Achievement Standard 1: The program has a course of study that is consistent with its mission and admission requirements.		
	Student Achievement Standard 2: The program or language institution documents in writing whether students are ready to progress to the next level or to exit the program of study, using instruments or procedures that appropriately assess the achievement of student learning outcomes for courses taken within the curriculum.	Student Achievement Standard 2: The institution has established a Satisfactory Academic Progress policy for the program that is used to determine student progress. Criteria for evaluating student progress is clear, as are the achievement standards/competencies and how they will be measured.		Law: Students with ID Definition: (B) be maintaining satisfactory progress in the program as determined by the institution, in accordance with standards established by the institution. Regs: (b) The institution's policy for determining whether a student enrolled in the program is making satisfactory academic progress; CTP: A copy of your institution's Satisfactory Academic Progress policy for the CTP.
	Student Achievement Standard 3: The program or language institution maintains and provides students with written reports that clearly indicate levels of language proficiency attained as a result of instruction.	Student Achievement Standard 3: The program maintains and provides students with written reports at the end of each "academic unit" (semester, trimester, etc.), accessible to the student, that clearly indicate evidence of student progress attained as a result of instruction.		
	Student Achievement Standard 4: The program or language institution informs students of the assessment procedures used to determine placement, progression from level to level, and completion of the program, as well as their individual results.			

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(ii)Curricula.	Curriculum Standard 1: The curriculum is consistent with the mission of the program or language institution, appropriate to achieve the organization's goals and meet assessed student needs, and available in writing.	Curriculum Standard 1: Each student's course of study aligns with statutory and regulatory requirements for a Comprehensive Transition Program. Curriculum Standard 2: The program provides students with ID access to a wide array of college courses that are attended by students without disabilities.		Regs: (CTP definition) (5) Requires students with ID to have at least one-half of their participation in the program, as determined by the institution, focus on academic components through one or more of the following activities: (i) Taking credit-bearing courses with students without disabilities. (ii) Auditing or otherwise participating in courses with students without disabilities for which the student does not receive regular academic credit. (iii) Taking non-credit-bearing, nondegree courses with students without disabilities. (iv) Participating in internships or work-based training in settings with individuals without disabilities; and (6) Provides students with ID opportunities to participate in coursework and other activities with students without disabilities. LAW (CTP definition): (E) Requires students with intellectual disabilities to be socially and academically integrated with non-disabled students to the maximum extent possible. REGS/CTP: includes above and: (a) The CTP is delivered to students physically attending the institution, but may include off-campus activities;
	Curriculum Standard 2: Curriculum Standard 2: Course goals, course objectives, and student learning outcomes are written, appropriate for the curriculum, and aligned with each other.	Curriculum Standard 3: The course of study is delivered to students physically attending the institution, but may include off campus activities. Curriculum Standard 4: Provide students with the supports and experiences necessary to seek and sustain integrated competitive employmen	Curriculum Standard 4 (new); See TC Quality Indicator 2.1 Provide students with the supports and experiences necessary to seek and sustain integrated competitive employment 2.1C: Participation in time-limited internships or work-based training in settings with people without disabilities. 2.1E: Participation in paid work experiences related to personal choice and career goals, such as paid internships, work-study, service learning or other paid work on or off campus.	

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
	Curriculum Standard 3: The instructional materials and methodologies are appropriate and contribute to the mastery of course objectives.	Curriculum Standard 5: Course selection and academic advisement takes into consideration the instructional materials and methodologies that assure student engagement and learning. (this needs to move) Strategies are utilized to employ universal design for learning (reference definition of UDL) in college classes.		
		Curriculum Standard 6 (new): Provide support to improve (campus membership), social and independent living skills,	Curriculum standard 5: see TC Benchmark: 1.2B: Access to and instruction in the use of needed public or personal transportation, such as public buses, taxis, para-transit, ride-sharing with other students and other naturally occurring transportation options. Curriculum standard 6 aligns with TC Standard 3: Campus Membership Quality Indicator 3.1: Provide access to and support for participation in existing social organizations, facilities, and technology. 3.1A: Campus programs, such as clubs and organizations, community service, religious life, student government, Greek system, co-curricular experiences, service learning, study abroad, student sports and entertainment events, recreational facilities and programs, etc. 3.1B: Residence life facilities and activities, including, when desired, the off campus housing office.3.1B: Technology for social communication, including email, texting, cell phone, Facebook, Twitter, Skype). 3.1C: Social activities facilitated by students without disabilities who serve as natural supports.	
(iii)Faculty.	Faculty Standard 1: Faculty members have education and training commensurate with their teaching assignments. Faculty Standard 2: Faculty have experience relevant to teaching students at the postsecondary level in their areas of assignment and demonstrate an ongoing commitment to professional development.	Faculty Standard 1 (combining 1&2): Faculty members, staff and other professionals have education and training commensurate with their teaching and other assignments and demonstrate an ongoing commitment to professional development.	Faculty Standard 1 might align with QI 5.4: Collaborate with faculty and staff, including: and Benchmark 5.4A: Accessing existing professional development initiatives on campus (i.e. workshops on Universal Design principles). (where does this one go?) 5.4B: Offering expertise of the program staff and students to faculty, other college personnel and students through trainings, course presentations, etc.	

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
	Faculty Standard 3: Faculty who teach English demonstrate excellent proficiency in English. In language institutions where languages other than English are taught, faculty demonstrate excellent proficiency in the languages they teach. Faculty Standard 4: Teachers in training are appropriately selected, trained, and supervised for the instructional situations in which they are placed. Faculty Standard 5: Faculty members each receive a job description and all the terms and conditions of employment in writing at the time they are hired and any time their duties or employment conditions change. Faculty Standard 6: The program or language institution has an adequate number of faculty, whose duties are structured to permit timely and effective completion. Faculty Standard 7: The program or language institution describes to faculty clearly and in writing the performance criteria and procedures for evaluation at the onset of the evaluation period; conducts faculty performance evaluations that are systematic, regular, fair, objective, and relevant to achieving program or institutional goals; and conveys evaluation results to faculty in writing in a timely manner.	Faculty standard 2 (equivalent to FS4): Student teachers in training, paid peer mentors and other individuals who are paid to work with students are appropriately selected, trained and supervised for the instructional and other situations in which they are placed. (??) (or replace underlined above with "other roles they fulfill") Faculty Standard 5 becomes Faculty Standard 3: should be shortened and Program staff each receive a job description and all the terms and conditions of employment in writing at the time they are hired and any time their duties or employment conditions change and receive evaluation results in a timely manner, in accordance with the practice of the institution. (NOTE: covered by QI 5.5?) (Shortened version): Faculty Standard 3: Program staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.	Quality Indicator 6.1: Establish connections and relationships with key college/university departments. TC Quality Indicator 5.5: Adhere to the college's schedules, policies and procedures, public relations and communications as evidenced by:	
		Faculty Standard 4: Support is provided to college faculty and staff to universally design courses and instruction. (moved from above)	TC Benchmark 1.2G Faculty training on universal design for learning principles	

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(iv)Facilities, equipment, and supplies.	Facilities, Equipment and Supplies Facilities, Equipment and Supplies Standard 1: The program or language institution has facilities, equipment, and supplies that support the achievement of its educational and service goals; are adequate in number, condition, and availability; and are accessible to students, faculty, and administrators.	Facilities, Equipment and Supplies Standard 1: Students in the program have reasonable access to the IHE facilities used by other IHE students.	Quality Indicator 5.3: Provide access to college campus resources.	

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(v) Fiscal and administrative capacity as appropriate to the specified scale of operations.	dministrative and Fiscal Capacity Standard 1: The program or language institution clearly defines and provides a rationale for formal linkages with other entities. Administrative and Fiscal Capacity Standard 2: The program or language institution has an administrative structure and a governance system that are effective in helping it achieve its mission and the mission of the host institution, if applicable. Administrative and support positions within that structure are adequate in number and staffed with individuals who have appropriate education, training, and experience. Administrative and Fiscal Capacity Standard 3: Administrators and staff each receive a written job description at the time they are hired and any time their duties or employment conditions change. Administrative and Fiscal Capacity Standard 4: The program or language institution defines, encourages, and supports appropriate professional development activities for faculty, staff, and administrators. Administrative and Fiscal Capacity Standard 5: The program or language institution describes to administrative and support staff clearly and in writing the performance criteria and procedures for evaluation at the onset of the evaluation period; conducts administrative and support staff performance evaluations that are systematic, regular, fair, objective, and relevant to achieving program goals; and conveys evaluation results to administrative and support staff in writing in a timely manner. Administrative and Fiscal Capacity Standard 6: Administrators ensure that policies and procedures relating to program or language institution operations are in place, accessible to all who are affected by them, reviewed regularly, and implemented in a timely, fair, systematic, and ethical manner. Administrative and Fiscal Capacity Standard 7: Administrators ensure that there are means for the exchange of information among those who need it. Administrative and Fiscal Capacity Standard 8: The program or language institution documents that it is in compliance with all local, state, and federal laws, as well as with any applicable institutional regulations. Administrative and Fiscal Capacity Standard 9: Financial, student, personnel, program, governmental, and contractual records are maintained and kept current, accessible, complete, accurate and, when appropriate, secure. Reporting is done ethically and in compliance with the law. Administrative and Fiscal Capacity Standard 10: Contracts are in compliance with the law and in keeping with policies of the larger institution, where applicable. Contracts are drafted with appropriate guidance, undergo appropriate review, and are authorized by the appropriate individual(s). Administrative and Fiscal Capacity Standard 11: Financial supervision is conducted by qualified individuals, who implement appropriate policies and procedures and follow accepted accounting practices to ensure the integrity of program or institutional finances. Administrative and Fiscal Capacity Standard 12: Financial reserves are adequate and available to meet obligations to students, staff, and any contractual parties.	Administrative and Fiscal Capacity Standard 1: (Combining 1 and first part of 2): The program has an administrative structure and an advisory team that is effective in helping it achieve its mission. Administrative and Fiscal Capacity Standard 2 (aligns with 3): Program administrators and staff each receive a written job description at the time they are hired and any time their duties or employment conditions change, in accordance with the practice of the institution. (NOTE: covered by QI 5.5?) (NOTE: above duplicates Faculty Standard 3) Administrative and Fiscal Capacity Standard 3 (aligns with 4): The program defines, encourages, and supports appropriate professional development activities for faculty, staff, and administrators. (NOTE: covered by QI 5.5?) Administrative and Fiscal Capacity Standard 4 (aligns with 5) The program describes to administrative and support staff clearly and in writing the performance criteria and procedures for evaluation at the onset of the evaluation period; conducts administrative and support staff performance evaluations that are systematic, regular, fair, objective, and relevant to achieving program goals; and conveys evaluation results to administrative and support staff in writing in a timely manner, in accordance with the IHE practice. (NOTE: covered by QI 5.5?) (NOTE: could be combined with previous and shortened.) Administrative and Fiscal Capacity Standard 5: The program is a recognized part of a department or unit of the institution, with a recognized place within the administrative structure of the institution. (NOTE: duplicative wording?) (NOTE: group said not to include #10 as written.) (NOTE: group said not to include #11 as written.) Administrative and Fiscal Capacity Standard 6: Financial reserves are adequate and available to meet obligations to students, staff, and any contractual parties.	Quality Indicator 7.1: Use diverse sources of funding. Quality Indicator 7.2: Have a planning and advisory team. Quality Indicator 5.4: Collaborate with faculty and staff. TC Quality Indicator 5.5: Adhere to the college's schedules, policies and procedures, public relations, and communications. Quality Indicator 6.2: Have a designated person to coordinate program-specific services of the comprehensive postsecondary education program.	

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(vi)Student support services.	Student Services Standard 1: Admissions policies are consistent with program objectives and with the mission of the program or language institution (and with the host institution if applicable), and are implemented by properly trained and authorized individuals. The admissions process ensures that the student is qualified to enroll in and benefit from the instructional program. Both the policies and the personnel who implement them adhere to ethical standards and good practice. Student Services Standard 2: The program or language institution provides academic and personal advising and counseling, as well as assistance in understanding immigration regulations. Such advice and assistance are provided in a timely and accurate manner by qualified individuals. Student Services Standard 3: The program or language institution provides pre-arrival and ongoing orientation (1) to support students in their adjustment to the program or institution (and to the host institution if applicable) and to the surrounding culture and community and (2) to help them understand immigration regulations and procedures, as well as health and safety issues. Student Services Standard 4: The program or language institution seeks to ensure that students understand policies regarding enrollment and registration. Student Services Standard 5: Students have access to health insurance if required and, in all cases, students are informed about the need for adequate health insurance coverage. Student Services Standard 6: Students have access to social and recreational activities that provide a cultural context for their language acquisition and other studies, as appropriate. Student Services Standard 7: The program or language institution clearly states and fulfills its responsibilities regarding student housing. Student Services Standard 8: The program or language institution clearly states and consistently provides the extent of student services described in any written, electronic, or oral promotional information or in agreements.	Student Services Standard 1: Admissions policies are consistent with program objectives and with the mission of the program and are implemented by properly trained and authorized individuals. The policies meet the criteria for Comprehensive Transition Programs (CTPs) in the Higher Education Opportunity Act. Both the policies and the personnel who implement them adhere to ethical standards and good practice. Student Services Standard 2: Program staff verify that students who receive financial aid meet the definition of a student with intellectual disabilities in the HEOA, including obtaining a record from a local educational agency that the student is or was found eligible for special education or related services under IDEA. If the record does not identify the student as having an intellectual disability, then the program must obtain documentation as described in the HEOA regulations. Student Services Standard 3 The program or institution provides academic and personal advising and counseling. Student Services Standard 4: Person-centered planning is utilized. Student Services Standard 5 (aligns with 3): The program or institution provides orientation to support students in their adjustment to the program or institution. Student Services Standard 6 Have a stated process for family involvement that reflects clearly defined roles and responsibilities for parents and students; a process for providing information to parents; student control over parental involvement and adherence to FERPA. Student Services Standard 7: Students have reasonable access to services, facilities, social and recreational activities available to all students at the institution. Student Services Standard 8: Provide students with the supports and experiences necessary to seek and sustain competitive employment. (NOTE: repeats Curriculum Standard 4 above)	Quality Indicator 5.2: Provide access to academic advising. Standard 4 aligns with TC Standard 4: Self-Determination Quality Indicator 4.1: Ensure student involvement in and control of the establishment of personal goals. Quality Indicator 4.2: Ensure the development and promotion of the self-determination skills of students with intellectual disability. Quality Indicator 4.3: Have a stated process for family involvement that reflects: 4.3A Clearly defined roles and responsibilities for parents and students. 4.3B A process for the provision of information to parents on resources, effective advocacy, and transition planning. 4.3C Student control over how parents are involved with their experience. 4.3D Adherence to the guidelines set forth by FERPA. TC Standard 2: Career Development Quality Indicator 2.1: Provide students with the supports and experiences necessary to seek and sustain competitive employment. QI 1.2 Address issues that may impact college course participation, including: and TC benchmarks 1.2A: College policies regarding placement tests, ability to benefit testing and prerequisites that negatively impact college course participation access. 1.2B: Access to and instruction in the use of needed public or personal transportation, such as public buses, taxis, para-transit, ride-sharing with other students and other naturally occurring transportation options. 1.2C: Access to college Disability Services for accommodations typically provided by that office. 1.2D: Access to and instruction in the use of needed technology. 1.2E: Access to educational coaches who receive ongoing training and supervision. 1.2F: Access to peer support such as mentors, tutors, and campus ambassadors. 1.3: Provide students with the skills to access ongoing adult learning opportunities.	Regs: (Program eligibility – definition of student with ID) (2) Who is currently, or was formerly, eligible for special education and related services under the Individuals with Disabilities Education Act (IDEA), including a student who was determined eligible for special education or related services under the IDEA but was home-schooled or attended private school. Regs: (student eligibility for purposes of receiving federal aid) (c) The institution obtains a record from a local educational agency that the student is or was eligible for special education and related services under the IDEA. If that record does not identify the student as having an intellectual disability, as described in paragraph (1) of the definition of a student with an intellectual disability in § 668.231, the institution must also obtain documentation establishing that the student has an intellectual disability, LAW (CTP definition: (C) Includes an advising and curriculum structure.

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(vii)Recruiting and admissions practices, academic calendars, catalogs, publications, grading, and advertising.	Recruiting Standard 1: All program or language institution personnel follow ethical standards for recruiting students and promoting programs, and they ensure that the program or language institution's policies and procedures are made clear to prospective students and/or student sponsors. In any recruitment transaction, the students' interests and well-being are paramount. Recruiting Standard 2: All written, electronic, and oral information used to recruit students is accurate and complete. Recruiting Standard 3: If a program or language institution has recruiting agreements or contracts with a third party, the program or institution ensures that it has complete information about the third party, assumes responsibility for monitoring the third party, and terminates the agreement if necessary.	Recruiting Standard 1: Program staff ensure that the program policies and procedures are made clear to prospective students and/or families using principles aligned with universal design for learning. Recruiting Standard 2: Recruiting and admissions are included in the public promotion of institution programs and are represented as are other programs of the institutions. (NOTE: CEA Standard 3 refers to when an institution contracts out part of the program)		

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(viii)Measures of program length and the objectives of the degrees or credentials offered.	Length and Structure of Program of Study Length and Structure of Program of Study Standard 1: The calendar states the number of terms per year, the number of weeks per term and the number of hours of instruction per week. The calendar is consistent with and supportive of the program or language institution's stated mission and goals. Length and Structure of Program of Study Standard 2: The program or language institution's curricular design clearly indicates the levels of instruction and specifies how students progress through a full program of study.	Length and Structure of Program of Study Standard 1: The calendar states the number of terms per year, the number of weeks per term and the number of hours of instruction per week. The calendar is consistent with and supportive of the program's stated mission and goals. (NOTE: use regs language instead?) Objectives of the degrees or credentials offered Standard 1: The program clearly describes the educational credential offered (e.g. degree or certificate) or identified outcome or outcomes established by the institution for all students enrolled in the program. (NOTE: check current CTP application wording.) The program clearly specifies how students progress through a full program of study and maintain satisfactory academic progress. (Note addressed SAP above)	Quality Indicator 5.1: As required in the HEOA, identify outcomes or offer an educational credential (e.g., degree or certificate) established by the institution for students enrolled in the program.	Regs (CTP application): The number of weeks of instructional time and the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities; REGS (CTP application): (d) A description of the educational credential offered (e.g., degree or certificate) or identified outcome or outcomes established by the institution for all students enrolled in the program;
(ix)Record of student complaints received by, or available to, the agency.	Student Complaints Standard 1: The program or language institution makes available to students, in writing, procedures by which they may lodge formal complaints. The program or language institution documents and maintains records of formal student complaints, as well as the resolution of any such complaints.	Student Complaints Standard 1: The program makes available to students procedures by which they may lodge complaints in a variety of accessible formats that result in a formal written complaint. The program documents and maintains records of formal student complaints, as well as the resolution of any such complaints.		

602.16 Accreditation and preaccreditation standards	CEA Standards for English Language Programs	Workgroup Draft Standards	Think College Standards & Quality Indicators	HEOA Law, Regulations & CTP Approval
(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, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency; and	Program Development, Planning, and Review Standard 1: The program or language institution has a plan, in writing, for development of the program or language institution, including planning, implementation, and evaluation. Program Development, Planning, and Review Standard 2: The program or language institution regularly reviews and revises its program components and has a plan, in writing, to guide the review of curricular elements, student assessment practices, and student services policies and activities. The plan is systematically implemented.	Program Development, Planning, and Review Standard 1 (Combines 1 & 2): The program has a plan, in writing, for development of the program including planning, implementation, and evaluation of services and outcomes on a regular basis. The plan is systematically implemented. Program Development, Planning, and Review Standard 2: The program provides information to the IHE required for compliance with the HEOA. (NOTE: should this instead say: Record of compliance with the institution's program responsibilities under Title IV of the Act?)	TC Standard 8: Ongoing Evaluation Quality Indicator 8.1: Conduct evaluation of services and outcomes on a regular basis.	
(2)The agency's preaccreditation standards, if offered, are appropriately related to the agency's accreditation standards and do not permit the institution or program to hold preaccreditation status for more than five years.				
(2)(e)An agency that has established and applies the standards in paragraph (a) of this section may establish any additional accreditation standards it deems appropriate.		The program has provided a copy of the letter or notice sent to the institutions accrediting agency informing the agency of its CTP program, including information required by the HEOA regulations.		Regs (CTP application): (e) A copy of the letter or notice sent to the institution's accrediting agency informing the agency of its comprehensive transition and postsecondary program. The letter or notice must include a description of the items in paragraphs (a) through (d) of this section; and (f) Any other information the Secretary may require.

See: http://www2.ed.gov/admins/finaid/accred/accreditation_pg13.html# for accreditation regulations.

Draft Model Accreditation Standards Survey Summary Report
December 22, 2015

1. I participated in:

Value	Percent		Count
Attended live webinar on October 6/October 27, 2014	9.7%		40
Listened to the webinar recording	39.9%		164
Attended a live session on the Accreditation Standards at a conference or meeting	6.3%		26
Did not participate in an informational session	44.0%		181
		Total	**411**

2. Check all that apply:

Value	Percent		Count
Parent of a person with ID	26.1%		100
Higher Education professional	30.0%		115
K-12 professional	13.8%		53
Other:	42.0%		161

3. State:

Value	Percent		Count
Georgia	4.0%		15
Maryland	5.1%		19
New York	11.3%		42
Pennsylvania	26.8%		100
South Carolina	3.5%		13
Texas	4.8%		18
Virginia	3.2%		12
All Others (click to expand) ▶	41.0%		154
		Total	373

4. Are you currently affiliated with a postsecondary program for students with ID?

Value	Percent		Count
Yes	35.3%		134
No	64.7%		246
		Total	380

5. Is the program a TPSID?

Value	Percent		Count
Yes	43.7%		55
No	56.3%		71
		Total	126

6. Is the program approved as a Comprehensive Transition Program?

Value	Percent		Count
Yes	49.6%		64
No	50.4%		65
		Total	129

7. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 1: The mission reflects that the program is a degree, certificate, or non-degree program at an accredited institution that is designed to support students with intellectual disabilities (ID) who are seeking to continue academic, career and technical, and independent living instruction in order to obtain integrated competitive employment and/or further education.		
Yes	278 53.1%	246 46.9%
No	17 28.3%	43 71.7%

8. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 2: The program has a written mission statement that is measurable and guides activities, policies, program evaluation and allocation of resources. This statement is communicated to faculty, students, staff, prospective students, and the public, and is evaluated periodically.		
Yes	269 53.0%	239 47.0%
No	18 27.3%	48 72.7%

9. Overall, do you feel the MISSION area is complete?

Value	Percent		Count
Yes	76.6%		223
No	23.4%		68
		Total	291

10. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 1: The program has a course of study that is consistent with its mission, admission requirements, and anticipated outcomes.		
Yes	234 52.7%	210 47.3%
No	17 30.4%	39 69.6%

11. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 2: The institution has established a Satisfactory Academic Progress policy that clearly states achievement standards and competencies and includes criteria for evaluating student progress and impact on student advancement.		
Yes	224 50.8%	217 49.2%
No	22 42.3%	30 57.7%

12. Standard 3:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 3: The program maintains and provides students with a written report at the end of each "academic unit" (semester, trimester, etc.), accessible to the student, that clearly indicates evidence of student progress attained as a result of instruction.		
Yes	238 50.7%	231 49.3%
No	12 41.4%	17 58.6%

13. Overall, do you feel the STUDENT ACHIEVEMENT area is complete?

Value	Percent		Count
Yes	81.5%		202
No	18.5%		46
		Total	248

14. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 1: The course of study aligns with the statutory and regulatory requirements for a Comprehensive Transition Program in the Higher Education Act.		
Yes	208 50.9%	201 49.1%
No	21 44.7%	26 55.3%

15. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 2: The program provides students with ID access to a wide array of college courses that are attended by students without disabilities.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	208 51.1%	199 48.9%
No	20 40.8%	29 59.2%

16. Standard 3:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 3: The course of study is delivered to students physically attending the institution, but may include off-campus learning opportunities.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	209 49.9%	210 50.1%
No	21 52.5%	19 47.5%

17. Standard 4:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 4: The course of study includes instruction and activities necessary to seek and sustain integrated competitive employment.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	208 50.7%	202 49.3%
No	20 43.5%	26 56.5%

18. Standard 5:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 5: The instructional materials and methodologies are appropriate and contribute to student engagement and learning.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	187 52.2%	171 47.8%
No	40 41.7%	56 58.3%

19. Standard 6:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 6: Provides support to improve student engagement in campus life, and enhance student development of social and independent living skills.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	210 53.2%	185 46.8%
No	16 28.6%	40 71.4%

20. Overall, do you feel the CURRICULUM area is complete?

Value	Percent		Count
Yes	75.0%		171
No	25.0%		57
		Total	**228**

21. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 1: Faculty members, staff and other professionals have education and training commensurate with their teaching and other assignments and demonstrate an ongoing commitment to professional development.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	207 52.3%	189 47.7%
No	14 32.6%	29 67.4%

22. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 2: Other individuals who work with students, such as teachers in training, peer mentors and job coaches are appropriately selected, trained and supervised.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	204 52.4%	185 47.6%
No	15 31.3%	33 68.8%

23. Standard 3:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 3: Program staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	217 50.6%	212 49.4%
No	5 35.7%	9 64.3%

24. Standard 4:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 4: Support is provided to college faculty and staff to universally design learning environments, courses and instruction.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	200 51.8%	186 48.2%
No	21 38.2%	34 61.8%

25. Overall, do you feel the FACULTY area is complete?

Value	Percent		Count
Yes	76.6%		170
No	23.4%		52
		Total	222

26. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 1: Students in the program have access to institutional facilities, consistent with other students, that supports the achievement of their educational goals.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	198 50.5%	194 49.5%
No	19 47.5%	21 52.5%

27. Overall, do you feel the FACILITIES, EQUIPMENT AND SUPPLIES area is complete?

Value	Percent		Count
Yes	80.7%	████████░░	176
No	19.3%	██░░░░░░░░	42
		Total	**218**

28. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 1: The program has an administrative structure and an advisory group that is effective in helping it achieve its mission.		
Yes	202 51.9%	187 48.1%
No	9 28.1%	23 71.9%

29. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 2: The program identifies, encourages, and supports access to appropriate professional development activities that meet the needs of faculty, staff, administrators and other individuals working with the students.		
Yes	204 51.0%	196 49.0%
No	7 33.3%	14 66.7%

30. Standard 3:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 3: Administrative and support staff receive a job description, performance criteria and evaluation in adherence to the policies and procedures of the institution.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	202 49.8%	204 50.2%
No	5 62.5%	3 37.5%

31. Standard 4:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 4: The program is a part of a department or unit of the institution, with a recognized place within its administrative structure.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	193 50.7%	188 49.3%
No	12 44.4%	15 55.6%

32. Standard 5:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 5: Contracts, Memoranda of Understanding and partnership agreements with third parties are in compliance with the law and in keeping with policies of the larger institution, where applicable. Such documents align with the mission of the program, and are consistently reviewed.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	194 50.5%	190 49.5%
No	13 44.8%	16 55.2%

33. Standard 6:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 6: Financial resources are adequate and available to meet obligations to students, staff and other contractual parties.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	197 52.4%	179 47.6%
No	9 26.5%	25 73.5%

34. Standard 7:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 7: Program has a fiscal and programmatic model for sustainability.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	195 51.0%	187 49.0%
No	11 36.7%	19 63.3%

35. Overall, do you feel the ADMINISTRATIVE AND FISCAL CAPACITY area is complete?

Value	Percent		Count
Yes	82.1%		165
No	17.9%		36
		Total	**201**

36. Standard 1:

Is the language in the standard clear?	Is the standard observable and measurable?

Standard 1: Admissions policies are consistent with program objectives and with the mission of the program and are implemented by properly trained and authorized individuals. The policies meet the criteria for Comprehensive Transition Programs (CTPs) in the Higher Education Act (HEA). Both the policies and the personnel who implement them adhere to HEA legislative intent, ethical standards and best practice.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	192 50.7%	187 49.3%
No	10 41.7%	14 58.3%

37. Standard 2:

Is the language in the standard clear?	Is the standard observable and measurable?

Standard 2: The program provides access to academic, employment and other advising, based on person-centered planning and in collaboration with existing institution services.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	197 50.5%	193 49.5%
No	5 38.5%	8 61.5%

38. Standard 3:

Is the language in the standard clear?	Is the standard observable and measurable?

Standard 3: The program provides orientation to support students in their adjustment to the institution in collaboration with existing institution services.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	197 50.8%	191 49.2%
No	3 27.3%	8 72.7%

39. Standard 4:

Is the language in the standard clear?	Is the standard observable and measurable?

Standard 4: The program has a stated process for family communication and involvement that reflects clearly defined roles and responsibilities for parents and students; student control over parental involvement and adherence to Family Educational Rights and Privacy Act (FERPA).

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	186 49.7%	188 50.3%
No	12 57.1%	9 42.9%

40. Standard 5:

Is the language in the standard clear?	Is the standard observable and measurable?

Standard 5: Students have access to services, facilities, social and recreational activities available to all students at the institution, to the extent possible.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	188 51.2%	179 48.8%
No	10 40.0%	15 60.0%

41. Standard 6:

Is the language in the standard clear?	Is the standard observable and measurable?

Standard 6: Provides supports and experiences designed to enable students to seek and sustain competitive, integrated employment.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	190 51.2%	181 48.8%
No	12 40.0%	18 60.0%

42. Overall, do you feel the STUDENT SERVICES area is complete?

Value	Percent		Count
Yes	81.4%		158
No	18.6%		36
		Total	194

43. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 1: The program aligns with the college calendar and specifies the number of weeks of instructional time and the number of semester or quarter credit hours or clock hours in the program, including the equivalent credit or clock hours associated with noncredit or reduced credit courses or activities.		
Yes	193 49.7%	195 50.3%
No	7 63.6%	4 36.4%

44. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 2: The program clearly describes the educational credential offered (e.g. degree or certificate) and identified outcome or outcomes established by the institution for all students enrolled in the program. The program clearly specifies how students progress through a full course of study and maintain satisfactory academic progress.		
Yes	195 50.5%	191 49.5%
No	5 45.5%	6 54.5%

45. Overall, do you feel the LENGTH AND STRUCTURE OF PROGRAM OF STUDY area is complete?

Value	Percent		Count
Yes	94.0%	![bar]	187
No	6.0%	![bar]	12
		Total	**199**

46. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 1: The program makes accessible to students written procedures by which they may lodge formal complaints. The program documents and maintains records of formal student complaints, as well as the resolution of any such complaints.		
Yes	184 49.3%	189 50.7%
No	13 65.0%	7 35.0%

47. Overall, do you feel the STUDENT COMPLAINTS area is complete?

Value	Percent		Count
Yes	85.1%	![bar]	166
No	14.9%	![bar]	29
		Total	**195**

48. Standard 1:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 1: The program regularly reviews and revises its program components and has a plan, in writing, to guide the review of curricular elements, student assessment practices, and student services, policies, activities and outcomes. The plan is systematically implemented.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	184 50.5%	180 49.5%
No	11 47.8%	12 52.2%

49. Standard 2:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 2: The program provides information to the institution required for compliance with Title IV of the Act and maintains a record of compliance with the institution's program responsibilities.

	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	188 50.4%	185 49.6%
No	7 43.8%	9 56.3%

50. Standard 3:

	Is the language in the standard clear?	Is the standard observable and measurable?

Standard 3: Program staff verify that students who receive financial aid meet the definition of a student with intellectual disabilities in the HEA, including obtaining a record from a local educational agency that the student is or was found eligible for special education or related services under IDEA. If the record does not identify the student as having an intellectual disability, then the program must obtain documentation as described in the HEA regulations.
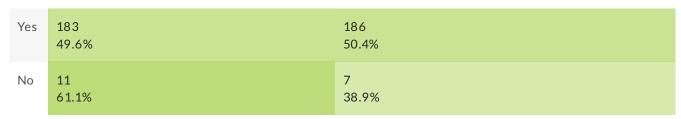
	Is the language in the standard clear?	Is the standard observable and measurable?
Yes	189 50.0%	189 50.0%
No	7 63.6%	4 36.4%

51. Standard 4:

	Is the language in the standard clear?	Is the standard observable and measurable?
Standard 4: The program has provided a copy of the letter or notice sent to the institutions accrediting agency informing the agency of its CTP program, including information required by the HEA regulations.		
Yes	183 49.6%	186 50.4%
No	11 61.1%	7 38.9%

52. Overall, do you feel the PROGRAM DEVELOPMENT, PLANNING AND REVIEW area is complete?

Value	Percent		Count
Yes	92.2%		177
No	7.8%		15
		Total	192