

## U.S.Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

### Recommendation Page

1. **Agency:** Accrediting Bureau Of Health Education Schools ( 1969 / 2011)  
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Request for an Expansion of Scope of Recognition
3. **Current Scope of Recognition:** The accreditation of private, postsecondary institutions in the United States offering predominantly\* allied health education programs leading to a certificate, diploma, and degrees at the level of the Associate of Applied Science, Associate of Occupational Science, Academic Associate, Baccalaureate and Master's; and the programmatic accreditation of medical assisting, medical laboratory technology, and surgical technology programs, through the Associate degree, including those offered via distance education. The scope extends to the Substantive Change Committee, jointly with the Commission, for decisions on substantive change.
4. **Requested Scope of Recognition:** The accreditation of private, postsecondary institutions in the United States offering predominantly\* allied health education programs and the programmatic accreditation of medical assistant, medical laboratory technician and surgical technology programs, leading to a certificate, diploma, Associate of Applied Science, Associate of Occupational Science, Academic Associate degree, Baccalaureate degree and Master's degree, including those offered via distance education. The scope extends to the Substantive Change Committee, jointly with the Commission, for decisions on substantive change.
5. **Date of Advisory Committee Meeting:** 02/22/2017
6. **Staff Recommendation:** Approve the agency's request for an expansion of scope to include master's degrees.
7. **Issues or Problems:** None

### Executive Summary

#### PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Accrediting Bureau of Health Education Schools (ABHES or the agency) is a national institutional and programmatic accreditor. Its current scope of recognition is the accreditation of private, postsecondary institutions in the United States offering predominantly allied health education programs and the programmatic accreditation of medical assistant, medical laboratory technician and surgical technology programs, leading to a certificate, diploma, Associate of Applied Science, Associate of Occupational Science, Academic Associate degree, or Baccalaureate degree including those offered via distance education. The scope extends to the Substantive Change Committee, jointly with the Commission, for decisions on substantive change.

ABHES accredits 243 institutions and 166 programs. The Secretary's recognition of the agency enables its accredited institutions to seek eligibility to participate in student financial assistance programs administered by the Department of Education under Title IV of the Higher Education Act of 1965, as amended. Consequently, the agency must meet the separate and independent requirements established in the regulations.

#### Recognition History

The Accrediting Bureau of Health Education Schools (ABHES or the agency) received initial recognition in 1969 for its accreditation of private and public medical laboratory technician programs. The agency's recognition has been periodically reviewed and continued recognition has been granted after each review. In 1974, the agency was granted an expansion of scope to include the accreditation of medical assistant programs in the private sector. In 1982, the agency received notice it was granted another expansion of scope for the accreditation of private, postsecondary institutions offering allied health education. In 1996, the agency was granted an expansion of scope to accredit institutions and programs leading to the Associate of Applied Science and the Associate of Occupational Science degrees. In 1999, the agency received notice it was granted an expansion of scope to accredit institutions offering predominantly allied health education programs. In 2004, the agency received notice it was granted an expansion of scope to include the programmatic accreditation of surgical technology programs. In 2007, the agency received notice it was granted an expansion of scope to accredit institutions and programs leading to the Academic Associate degree and programs offered via distance education. In 2012, ABHES received notice the agency's scope was extended to the Substantive

Change Committee for decisions on substantive change.

The last full review of the agency was conducted at the June 2016 National Advisory Committee on Institutional Quality and Integrity (NACIQI or the Committee) meeting, at which the Committee recommended and the Secretary concurred that the agency's recognition be renewed for five years. The agency is seeking to expand its scope to include Master's degrees and that is the reason for this petition.

\*Note for agency's scope: Predominantly is defined by the agency in the following way: It is an educational institution that offers programs predominantly in the health education field. An institution meets this requirement if (a) 70 percent or greater of its full-time equivalent students are enrolled in health programs, or (b) 70 percent of its active programs are in the health education field, provided that a majority of an institution's full-time equivalent students are enrolled in those programs. A program is active if it has a current student enrollment and is seeking to enroll students.

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## PART II: SUMMARY OF FINDINGS

### **602.12 Accrediting Experience**

**(NOTE: Only recognized agencies seeking an expansion of scope need to respond.)**

The agency has provided documentation demonstrating that it is in the process of conducting a pilot project to accredit Master's degree level programs. Justification for the Master's degree (exhibit 1) explains the agency's rationale for requesting this expansion of scope. The agency has also provided correspondence between the institution and the agency. Meeting minutes and information about the Pilot Task Force, Standards Review Committee, Substantive Change committee, and Policy Committee were also provided.

Department Staff is planning to accompany the agency on a site visit in early November to observe the agency's review and evaluation of a Master's degree level program for compliance with its standards. At the time of the draft petition, this observation is still pending. Per the requirements of the Criteria in this section, a recognized agency seeking an expansion of its scope of recognition must demonstrate that it has granted accreditation to the program.

#### **Analyst Remarks to Response:**

The agency has provided the requested additional information and documentation demonstrating its review, evaluation, and decision to grant approval of a master's degree program. The agency has included the application (exhibit 13), a copy of the site visit report (exhibit 14), and the approval letter to the institution (exhibit 15). This change was approved by the substantive change committee for ABHES which is recognized in the agency's scope as a decision making body. Department staff was able to observe the review by the agency for a master's degree program.

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### **602.15 Administrative and fiscal responsibilities**

**The agency meets this requirement if the agency demonstrates that--**

**(a) The agency has--**

#### **(1) Adequate administrative staff and financial resources to carry out its accrediting responsibilities;**

The agency has policies in place that provide for adequate staffing and financial capacity planning within the agency. The agency maintains 16 employees. The agency has provided documentation that describes the functional job responsibilities for each staff member (Exhibit 26). However, the agency has not provided documentation in the job responsibilities that demonstrates who has the oversight for the new Master's degree programs. Additionally, no documentation was provided such as resumes for each staff member that will be performing / overseeing accreditation activities for the new Master's degree programs that demonstrates those individuals have the necessary qualifications for providing oversight of the Master's degree programs. Finally, there was also no documentation provided that demonstrates how staff members are trained for their roles in providing support for these programs.

The agency has also included documentation that demonstrates sound fiscal capacity for the agency. Audited income statements (exhibit 47) as well as a summary of reserved funds (exhibit 27) were provided.

**Analyst Remarks to Response:**

The agency has explained in their narrative how it has updated its job responsibilities to reflect oversight of the new Master's degree programs, as well as provided resumes (exhibit 4) and documentation of training (exhibit 5) that demonstrates staff who are responsible for performing and overseeing accreditation activities for the new master's degree programs are appropriately qualified.

**(2) Competent and knowledgeable individuals, qualified by education and experience in their own right and trained by the agency on their responsibilities, as appropriate for their roles, regarding the agency's standards, policies, and procedures, to conduct its on-site evaluations, apply or establish its policies, and make its accrediting and preaccrediting decisions, including, if applicable to the agency's scope, their responsibilities regarding distance education and correspondence education;**

The agency has provided the standards for evaluating master's degree programs in addition to documentation demonstrating that individuals it will utilize for conducting review of its Master's degree level programs are competent and well qualified.

The agency has provided a sample resume of an evaluator (exhibit 22), as well as resumes for members of its Preliminary Review Committee (PRC) (exhibit 29) that makes recommendation to the commission regarding analysis/evaluation of the program.

Additionally, the agency included documentation of training demonstrating how the master's degree level evaluators are trained for their role in evaluating the master's degree programs (exhibit 34) and documentation of how they are selected (exhibit 31). While the agency did include documentation stating qualifications for Master's degree reviewers (exhibit 30), this information should also be included in the updated evaluator qualification requirements document (exhibit 28) as well.

The agency is not clear in its documentation about how it determined that appeal panel members will have the appropriate level of qualifications or the selection process for convening an appeals panel.

**Analyst Remarks to Response:**

The agency has added the new master's degree review qualifications to the list for all qualified evaluators (exhibit 6). Additionally, the agency has explained the process it will follow for convening an appeal panels for master's degree level programs. The agency has included resumes and documentation (exhibit 7) providing details about members that will serve on the appeals panel. Finally, the agency has provided their policies from the Accreditation Manual (exhibit 8) that demonstrates how the agency will conduct training for the appeals panel role if and when warranted in the future.

**(3) Academic and administrative personnel on its evaluation, policy, and decision-making bodies, if the agency accredits institutions;**

The agency outlines its policies regarding Commission members in its Accreditation Manual, specifically subsection 3, article IV and VI. The agency's standards also require that academic and administrative representatives serve on its commission, substantive review committee, onsite evaluation teams, and appeals panel. The agency also provided documentation to demonstrate that its commission members, evaluation teams, and appeals panel include members from the appropriate categories. However, the agency has not provided documentation (such as an onsite visit report) to demonstrate that the onsite team that evaluated a master's degree program was of the proper composition.

**Analyst Remarks to Response:**

The agency has provided documentation that the onsite evaluation team (exhibit 5) included a site team member that has relevant experience and qualifications to evaluate a master's degree program. The review of the master's program was conducted in accord with the agency's Accreditation Manual (Exhibit 8), that requires the program to be evaluated on site by a program specialist accompanied by an ABHES staff member.

**(4) Educators and practitioners on its evaluation, policy, and decision-making bodies, if the agency accredits programs or single-purpose institutions that prepare students for a specific profession;**

The agency's standards require that educator and practitioner representatives serve on its commission, substantive review committee, onsite evaluation teams, and appeals panel. The agency also provided documentation to demonstrate that its commission members, evaluation teams, and appeals panel include members from the appropriate categories and provided resumes demonstrating their qualifications for holding these positions. However, the agency has not provided documentation (such as an onsite visit report) for the review of a new Master's degree program level demonstrating the onsite team is of the proper composition and members have the relevant experience to evaluate master's degree programs.

**Analyst Remarks to Response:**

The agency has provided documentation that the onsite evaluation team (exhibit 5) included a site team member that has relevant experience and qualifications to evaluate a master's degree program. The review of this program was conducted in accord with the agency's Accreditation Manual (Exhibit 8), that requires the program to be evaluated on site by a program specialist accompanied by an ABHES staff member.

**(5) Representatives of the public on all decision-making bodies; and**

The agency outlines its policies regarding Commission members in its Accreditation Manual, specifically subsection 3, article IV and VI.

Commissioners: The commission is comprised of a minimum of nine members and a maximum of 15. Per the agency's Accreditation Manual, seven of the commissioners are elected by institutional personnel representing institutions and programs accredited by the Commission and six of the commissioners are appointed by the Commission itself. At least two of the appointed commissioners are representatives of the public. The agency adheres to the Department's federal definition for public members and states that these individuals will also comprise at least 1/7th of the membership of the commission. The Commission membership is a combination of administrators, educators/practitioners, and public members which serves as the policy and decision making authority for the agency. The commission membership roles are outlined in the agency's bylaws.

The agency has provided documentation that lists the current Commission members, describes their roles, and included their resumes (exhibit 37). The agency has submitted copies of its public member's resumes (exhibit 42). The agency has also provided documentation that demonstrates its selections of commission members and the agency has included documentation that demonstrates the selection and vetting process to ensure that public members are competent and knowledgeable.

Appeals panel members: The agency outlines its standards regarding Appeals members in its Accreditation Manual, specifically subsection 2c. The standards explain that an appeals panel is comprised of three or four members (dependent on type of appeal), one of which is a public member, one is an administrator, one is a practitioner (as applicable), and one is an academician. The agency has provided documentation of its pool of appeals panel members (exhibit 42).

**(6) Clear and effective controls against conflicts of interest, or the appearance of conflicts of interest, by the agency's--**

**(i) Board members;**

**(ii) Commissioners;**

**(iii) Evaluation team members;**

**(iv) Consultants;**

**(v) Administrative staff; and**

**(vi) Other agency representatives; and**

The agency has standards in its Accreditation manual used to protect against conflict of interest, specifically those included in Chapter 1.A.4, subsections 4 and 5. The standards address specific examples of conflicts of interest that have been encountered by the agency before. The agency has included documentation (exhibit 34) of training for stakeholders (commission members, evaluators, appeals panels) for identifying conflict of interest. The agency has also provided resumes and signed conflict of interest forms (exhibit 31) demonstrating the application of its conflict of interest policy for the master's degree level reviewers.

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**602.16 Accreditation and preaccreditation standards**

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:**

**(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.**

With regards to outcomes data, the agency reviews information that is relative to the mission and purpose of institutions seeking accreditation. This requirement is documented in section VI.D.1. of the agency's Accreditation Manual which stipulates institutions must publish in its catalog a stated mission that encompasses achievement of master's degree program objectives (if the institution accredits such programs). Emphasis is placed on high levels of critical thinking, research, and analytical skills that are essential for problem solving in the discipline of study.

This language regarding an appropriate level of rigor for Master's degree level programs is common to the other agencies. Refer to the ANALYSIS OF STANDARDS REGARDING THE MASTER'S DEGREE ACROSS ACCREDITORS SAMPLE COMPARISON MATRIX exhibit uploaded by the analyst. While it appears that the standards are similar to those of other agencies, ABHES must provide documentation such as the self-study and on site team evaluation report to demonstrate the agency has reviewed and assessment of a master's degree program against its student achievement standards.

### **Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its student achievement standards.

The agency outlines its policies regarding Curricula in its Accreditation Manual, specifically for the Master's degree in section VI.D.6.a. ABHES requires a minimum of 30 semester units or 45 credit hours equivalent for the Master's Degree. An additional 3 to 6 semester or 4 to 8 quarter credit hours are required as a culminating assessment. Examples of a culminating assessment include comprehensive examination, capstone, research project or thesis. In addition, the student must achieve a cumulative grade point average of 3.0 (on a typical 4.0 scale) to be considered eligible for graduation. Only courses completed with a minimum grade point average of 2.0 may be applied toward program completion. This standard is comparable to other agencies for curricula standards for Master's degree programs.

The agency does not offer correspondence education, but does offer distance education. The application for the school in the pilot program for Master's degree states that the program will be offered entirely online. However, the agency has not provided information and documentation regarding the review of distance education programs at the Master's degree level. Additionally, the agency has not provided the self-study and on site team evaluations to demonstrate the review and assessment of curricula for master's degree programs.

### **Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its curricula standards. In addition, the agency has explained in its narrative and has policies (exhibit 8) demonstrating that it does not differentiate its 'degree standards' based on method of delivery addressing the previously mentioned concerns regarding distance education.

With regards to faculty qualifications, ABHES Standard V1.D.2.b requires that faculty consists of qualified individuals. A minimum of 50% of the faculty must have earned a doctorate, academic preparation in the discipline and three years of experience in the field. Faculty members without an earned doctorate must have an earned master's degree, academic preparation in the discipline and three years of experience in the field. Faculty members holding a terminal degree, i.e. professional degree such as J.D. or M.D., may meet the qualification requirement with justification.

This language regarding faculty qualifications for Master's degree level programs is common to the other agencies. Refer to the ANALYSIS OF STANDARDS REGARDING THE MASTER'S DEGREE ACROSS ACCREDITORS SAMPLE COMPARISON MATRIX exhibit uploaded by the analyst. While it appears that the standards are similar to those of other agencies, ABHES must provide a self-study and on site team evaluation report to demonstrate the agency's review and assessment of a master's degree program against its faculty standard.

Department staff was able to verify that the site team verified the qualifications of faculty members during the agency's visit.

### **Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its faculty standards. Department staff was able to observe a review conducted of the faculty to ensure that they met the agency's standards for appropriate qualifications.

With regards to facilities, equipment, and supplies, ABHES Standard VI.D.4. states that institutions offering master's degree programs must provide comprehensive services to support the number of programs, size and characteristics of the graduate

student body. Additionally, ABHES standards require that there shall be library resources that complement the program. In addition the budget for library services must be sufficient to support the size and scope of the institution and the level of programs offered. The allocated budget must be expended for the purchase of books, subscriptions to appropriate online databases, periodicals, library equipment, and other resource and reference material. ABHES protocol specifies that an individual who possesses professional academic education and experience supervises the library.

Finally, ABHES Standard V1.D.3.c specifies that the institution encourages student and faculty use of the library resources available. Graduate faculty and library staff are actively engaged in evaluation, selection, and acquisition of appropriate resources for the graduate program. The faculty requires and directs graduate student use of the library resources. The library's adequacy ultimately is determined by the extent to which its resources support all of the courses offered by the institution.

While it appears that the standards are similar to those of other agencies, ABHES must provide a self-study and on site team evaluation report to demonstrate the agency's review and assessment of a master's degree program against its facilities standards.

**Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its facilities, equipment, and supplies standards.

The agency outlines its standards for fiscal and administrative capacity in the Accreditation Manual, specifically section IV. Institutions or programs are reviewed to ensure that they operate effectively, operate in accordance to the institution or program mission, and are relative to the responsibilities of those students and employees. Further information included demonstrates the agency regularly reviews the fiscal status of each institution or program by its financial review committee. Documentation (exhibit 51) provides resumes for the financial review committee, their minutes (exhibit 17) and their operating procedures (exhibit 56). ABHES has provided several examples of its review for fiscal and administrative capacity from a variety of settings.

With regards to student services, ABHES Standard V1. D. 4 requires that institution's offering master's degree programs provide comprehensive services to support the number of programs and size and characteristics of the graduate student body.

This language regarding student services for Master's degree level programs is common to the other agencies. Refer to the ANALYSIS OF STANDARDS REGARDING THE MASTER'S DEGREE ACROSS ACCREDITORS SAMPLE COMPARISON MATRIX exhibit uploaded by the analyst. While it appears that the standards are similar to those of other agencies, ABHES must provide a self-study and on site team evaluation report to demonstrate the agency's review and assessment of a master's degree program against its student services standard.

Department staff was able to verify that the site team verified the type of student services offered at the institution during the agency's site visit.

**Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its student support standards.

With regards to advertising and recruiting, ABHES Standard VI.D.5. states that advertising and promotional materials contain clear and provable statements. The standards further require that advertising, promotional materials, and literature accurately describe the master's degree program(s).

This language regarding advertising and recruitment for Master's degree level programs is common to the other agencies. Refer to the ANALYSIS OF STANDARDS REGARDING THE MASTER'S DEGREE ACROSS ACCREDITORS SAMPLE COMPARISON MATRIX exhibit uploaded by the analyst. While it appears that the standards are similar to those of other agencies, ABHES must provide a self-study and on site team evaluation report to demonstrate the agency's review and assessment of a master's degree program against the agency's advertising and recruitment standards. In addition it is unclear to Department Staff why Exhibit 57 was included as in this section.

**Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its recruitment standards. Department staff was able to observe the site team verify information for the recruitment of this master's program. The team verified that the institution was forthcoming notifying students and the public that this master's program was a 'pilot program' and the program's participants are not (currently) eligible for federal student aid.

The agency outlines its policies regarding Curricula in its Accreditation Manual, specifically for the Master's degree in section

VI.D.6.a. ABHES requires a minimum of 30 semester units or 45 credit hours equivalent for the Master's Degree. An additional 3 to 6 semester or 4 to 8 quarter credit hours are required as a culminating assessment. Examples of a culminating assessment include comprehensive examination, capstone, research project or thesis. In addition, the student must achieve a cumulative grade point average of 3.0 (on a typical 4.0 scale) to be considered eligible for graduation. Only courses completed with a minimum grade point average of 2.0 may be applied toward program completion. This standard is comparable to other agencies for curricula standards for Master's degree programs. However, the agency must provide a self-study and onsite team evaluation report to demonstrate the agency's review and assessment of a master's degree program against the agency's faculty standard.

**Analyst Remarks to Response:**

The agency has provided documentation of the application from the institution (in lieu of the self-study, exhibit 13) and the onsite degree verification evaluation report (exhibit 1) that demonstrates the agency's review and assessment of a master's degree program against its program length standards.

The agency has provided its complaint policies outlined in Subsection 5 of the agency's Accreditation Manual (exhibit 36). The complaint processes are specific and require particular steps in order to allow the agency to review in a manner that is appropriate to the type of complaint. In accordance with sections IV.1.2 and IV.1.3 the agency indicates that the institution and/or program has the responsibility for ensuring that a student complaint process exists and for the maintenance of the records(including resolution) of complaints. Complaints are stored in an electronic folder by the agency as demonstrated by exhibit 6.

The agency has additionally provided an example of a complaint resolved by the agency (exhibit 48) demonstrating application of this standard.

**(a)(1)(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**

The agency has standards in its Accreditation Manual that outlines its expectations regarding Title IV responsibilities, specifically in Chapter IV. The standards require that the institution or program must notify ABHES regarding its student loan default rates and any findings from a Department of Education program review. The agency provided documentation (exhibit 33) demonstrating the application of its standard. In addition, the agency's financial review committee regularly conducts reviews for items that are pertinent to financial stability. The agency has previously explained their role, experience, and training (under competency of representatives) included documentation of the committees operating procedures (exhibit 56).

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**602.22 Substantive change.**

**The agency meets this requirement if--**

**(1) The agency requires the institution to obtain the agency's approval of the substantive change before the agency includes the change in the scope of accreditation or preaccreditation it previously granted to the institution; and**

The agency has standards in its Accreditation Manual that outlines its expectations regarding substantive change, specifically in Chapter III.B. The standards prescribe the procedures for requesting approvals based on the submission from an institution or program that outlines the change and explains how it does not adversely impact the current capacity.

The substantive change committee is recognized by the Department as a decision maker for the agency on substantive change. The committee is comprised of the Commission and the agency listed these individuals in its narrative. The composition of the substantive change committee meets the requirements of 34 CFR 602.15(a). The agency has provided documentation demonstrating the review processes for the Master's Expansion of Scope. Documentation (exhibits 36 and 8) included a completed substantive change application and petition from the institution requesting the expansion.

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**PART III: THIRD PARTY COMMENTS**

The Department did not receive any written third - party comments regarding this agency.