



UNITED STATES DEPARTMENT OF EDUCATION
OFFICE OF POSTSECONDARY EDUCATION

May 9, 2018

Marcie Mack
State Director
Oklahoma Board of Career and Technology Education
Oklahoma Department of Career and Technology Education
1500 West Seventh Avenue
Stillwater, OK 74074-4364

Dear Dr. Mack:

I am writing to inform you of my decision on the renewal of recognition of the Oklahoma Board of Career and Technology Education (OBCTE). U.S. Department of Education (Department) staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) have each made recommendations to me. These recommendations were made under Sections 114 and 496 of the Higher Education Act of 1965, as amended, and pursuant to relevant statutory and regulatory provisions.

Both the Department staff and the NACIQI recommended I grant the agency an extension of its recognition, for good cause, and require the agency to submit a report demonstrating its compliance with the cited criteria. Staff and NACIQI recommendations differed in that staff recommended providing OBCTE a good cause extension for one year and NACIQI recommended an extension for six months, with OBCTE responsible for submitting the report demonstrating compliance within 30 days of the one year or six month extension period, as applicable.

I concur with the recommendation of NACIQI and staff to provide OBCTE a good cause extension for one year and for it to provide evidence of compliance within 30 days of the one year period; however, I disagree with some of the specific elements of the findings and what is required by the regulations for OBCTE to come into full compliance.

First, while Department regulations require students (and others) to be a part of the self-assessment of programs, the regulations do not specify how many students need to participate in this process or through what mechanisms they must be involved. *See* 34 C.F.R. § 603.24(a)(3)(ii)(A). The staff analysis suggests an interpretation of the regulation that requires the inclusion of one or more students on the self-study committee or to be involved in the development of the self-study document. While these may be common practices for engaging students, the regulation does not require it and it is up to the agency to determine how student input will be integrated into the self-assessment process. For example, the agency could require the self-analysis to include a review and summary of student end-of-course survey results, or to seek student input in other ways. Therefore, in order to come into full compliance, the agency must develop criteria for engaging students in the self-assessment process. If such engagement does take place, and we simply missed this in our evaluation of OBCTE, we request that the agency provide staff with information on how this is accomplished. Otherwise, OBCTE needs

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to develop an appropriate policy and at the time of its next renewal of recognition review, demonstrate that it has been implemented fully.

Second, I believe OBCTE has met the minimum requirements of 34 C.F.R. § 603.24(b)(2)(iii) (Response to Report), to the best of its ability. OBCTE's Accreditation Guidelines state:

The accreditation coordinator will submit the feedback report to the educational institution and solicit feedback prior to the State Board accreditation decision. The chief executive officer of the institution will have the opportunity to comment upon the written report and file supplemental material pertinent to the facts and conclusions in the written report of the visiting team before action is taken.

Accreditation Guidelines for Oklahoma Public Postsecondary Career and Technology Education, Last Update June 2017, Oklahoma Department of Career and Technology Education, pages 8-9.

This provision of OBCTE's guidelines practically mirrors the text of the applicable regulation that the agency "[p]rovides the chief executive officer of the institution or program with opportunity to comment upon the written report and to file supplemental materials pertinent to the facts and conclusions in the written report of the visiting team before the agency takes action on the report." 34 C.F.R. § 603.24(b)(2)(iii). If, during the review period, OBCTE conducted an accreditation review and, in return, either solicited or received comments back from a chief executive officer, we ask that the agency provide staff with a copy of those comments and an explanation of how they were incorporated into the final agency review. However, if it is the case that, to date, no chief executive officer has exercised the right to submit comments, then OBCTE has done all it can to demonstrate compliance. Certainly there is no evidence to suggest that a chief executive officer was prevented from submitting comments or supplemental materials, or that such materials were ignored during a final review, and the opportunity to provide such comments is made abundantly clear in the agency's standards.

I do concur with the finding that OBCTE must expand its ethics policy to address the particular issues listed in the Department's guidelines. I understand that OBCTE references the standard ethics requirements for government agencies and employees in Oklahoma, but there are some additional requirements related directly to the provision of higher education that must be addressed as well. I ask that OBCTE add these additional elements to its ethics standards, and provide staff with evidence of those updates when available. The Department will expect to see evidence that the accreditation reviews they perform include these standards when OBCTE undergoes its next regularly scheduled recognition review.

Please convey my best wishes to the members of the OBCTE. OBCTE has done an excellent job of modifying their standards to conform with the Department's regulations and I am confident that these final adjustments will be accomplished by OBCTE in a timely manner.

Sincerely,



Diane Auer Jones
Senior Policy Advisor
Office of Postsecondary Education