

U.S. Department of Education

**Staff Report
to the
Senior Department Official
on
Recognition Compliance Issues**

RECOMMENDATION PAGE

1. **Agency:** Midwifery Education Accreditation Council (2001/2003)
(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:** Compliance Report
3. **Current Scope of Recognition:** The accreditation and pre-accreditation throughout the United States of direct-entry midwifery educational institutions and programs conferring degrees and certificates, including the accreditation of such programs offered via distance education.
4. **Requested Scope of Recognition:** Same as above.
5. **Date of Advisory Committee Meeting:** December, 2012
6. **Staff Recommendation:** Accept the agency's report and renew its recognition for three years.
7. **Issues or Problems:** None.

EXECUTIVE SUMMARY

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Midwifery Education Accreditation Council (MEAC) is both a programmatic and an institutional accreditor. It accredits direct-entry midwifery educational programs and institutions awarding degrees and certificates throughout the United States. MEAC accredits or pre-accredits two programs and eight institutions located in nine states. Four of the institutions have components offered via distance education or correspondence education.

The agency's accreditation enables its accredited, certificate and degree-conferring institutions to establish eligibility to participate in Federal programs administered by the Department of Education under the Higher Education Act (HEA) of 1965, as amended. Currently, three institutions accredited by MEAC participate in the HEA Title IV programs.

Recognition History

MEAC developed its accreditation standards and administrative policies and procedures in 1991 using a national consensus-building process with input from representative midwifery educators and schools. The agency began conducting its accreditation activities in 1993-94 and accredited its first institution in 1995. The National Advisory Committee on Institutional Quality and Integrity (NACIQI) considered MEAC for initial recognition at its Fall 2000 meeting and the Secretary's letter officially conferring recognition was sent to the agency in 2001. The agency was granted continued recognition for a period of five years in 2003. The agency was again reviewed for continued recognition at the Fall 2007. At that time, the agency's recognition was deferred for one year and the agency was requested to provide a report to the Committee for review at the Spring 2009 meeting. Due to the passage of the HEOA, the NACIQI did not meet in Spring 2009.

In January 2010, as a result of new regulations effective July 1, 2010, the agency was requested to submit a new petition for consideration at the Fall 2010 NACIQI meeting. At that time, the MEAC's recognition was deferred for one year and the agency was requested to provide a report to the Committee on several outstanding issues. Those issues are the subject of the agency's current report.

PART II: SUMMARY OF FINDINGS

§602.15 Administrative and fiscal responsibilities

The agency must have the administrative and fiscal capability to carry out its accreditation activities in light of its requested scope of recognition.

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

(a) The agency has--

(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;

At the time of its last review, the agency was requested to provide documentation that its Board and ARC members are trained for reviews that include distance and correspondence education. In response, the agency developed specific training materials that address these areas.

A module on Reviewing Distance and Correspondence Education Programs was developed, and Board meeting minutes document that the members logged on to complete the training module online in February 2012. The agency notes that no distance/correspondence reviews have yet taken place, but states that on-site reviewers will also complete the online training module before visiting programs/institutions that have distance/correspondence education components.

The agency provided a copy of the module, which addresses topics related to distance/correspondence education using examples from the agency's accredited programs/institutions. The module notes that none of the agency's programs are offered entirely by distance/correspondence since all clinical experiences must take place under direct supervision. The module notes that the agency's review process will include examining specific evidence related to distance/correspondence courses, including course design and materials, faculty preparation, facilities and technology, support services, marketing materials, and admission criteria. It further notes that programs that offer distance/correspondence courses must meet all of the agency's benchmarks for accreditation.

The module provides specific instructions for reviewing the standards in relation to distance/correspondence education. For example, student/faculty interactions must be observed, technical support must be examined, student access to

learning resources must be verified, reviewers must be granted temporary access to on-line courses, etc. The module includes a sample site visit schedule and notes that interviews may be conducted by phone. The agency also updated its Accreditation Review Training Manual to include specific directions for the evaluation of distance/correspondence education.

The agency's report has satisfactorily addressed the findings identified in the staff analysis, and no additional information is requested.

§602.17 Application of standards in reaching an accrediting decision.

The agency must have effective mechanisms for evaluating an institution's or program's compliance with the agency's standards before reaching a decision to accredit or preaccredit the institution or program. The agency meets this requirement if the agency demonstrates that it--

(e) Conducts its own analysis of the self-study and supporting documentation furnished by the institution or program, the report of the on-site review, the institution's or program's response to the report, and any other appropriate information from other sources to determine whether the institution or program complies with the agency's standards; and

At the time of its last review, the agency was requested to demonstrate that all Board members have access to, and conduct their own analysis of, all documents provided by the institution and the site visit team related to the review. In response to the staff analysis, the agency revised its policies to more clearly specify that the Board conducts its own analysis of the materials related to the on-site review.

The agency provided a copy of Section G.III.D.6 of its Policies and Procedures from the agency's Accreditation Handbook, which staff verified is also posted on the agency's Web site, that specifies the decision-making responsibilities of the agency's Board members. It states that the Board will conduct its own analysis of the accreditation process materials, including the self-evaluation report, site visit report books, Accreditation Review Committee (ARC) reports, institution/program responses, and any other relevant materials. Two Board members will be assigned to conduct a review of those materials, present their findings, and make a recommendation to the Board. All Board members will be provided electronic access to the materials prior to the Board meeting, except for those recused from making a decision.

The agency also provided a statement of its "MEAC Board of Directors Access to Accreditation Review Materials" document, which specifies that "the expectation is that all board members will have read the accreditation review template and the ARC's final report in advance of the decision-making meeting." It also specifies that Board members will have access to all accreditation

materials related to an on-site review in order to prepare themselves for the decision-making meeting.

As documentation, the agency provided Board minutes and staff records related to Board decisions, including the date of the decision-making meeting, the name of program/institution being considered, the Board members who participated in the decision, the ARC members present for the discussion, the lead Board member presenting the findings, and the findings discussed.

The agency's report has satisfactorily addressed the findings identified in the staff analysis, and no additional information is requested.

§602.18 Ensuring consistency in decision-making

The agency must consistently apply and enforce standards that respect the stated mission of the institution, including religious mission, and that ensure that the education or training offered by an institution or program, including any offered through distance education or correspondence education, is of sufficient quality to achieve its stated objective for the duration of any accreditation or preaccreditation period granted by the agency. The agency meets this requirement if the agency--

(b) Has effective controls against the inconsistent application of the agency's standards;

At the time of its last review, the agency was requested to provide documentation that its Board and ARC members are trained for reviews that include distance and correspondence education. This finding was related to the finding under 602.15(a)(2). As noted in the current staff analysis of that section, the agency has developed specific training materials that address these areas, including a module on Reviewing Distance and Correspondence Education Programs. Board meeting minutes document that the members logged on to complete the training module online in February 2012. The agency notes that no distance/correspondence reviews have yet taken place, but states that on-site reviewers will also complete the online training module before visiting programs/institutions that have distance/correspondence education components.

The agency's report has satisfactorily addressed the findings identified in the staff analysis, and no additional information is requested.

§602.24 Additional procedures certain institutional accreditors must have.

If the agency is an institutional accrediting agency and its accreditation or preaccreditation enables those institutions to obtain eligibility to participate in Title IV, HEA programs, the agency must demonstrate that it has established and uses all of the following procedures:

(2) The agency must evaluate the teach-out plan to ensure it provides for the equitable treatment of students under criteria established by the agency, specifies additional charges, if any, and provides for notification to the students of any additional charges.

At the time of the last review, the agency was requested to provide evidence related to its process for determining that its teach-out plans provide for the equitable treatment of students and that additional charges are appropriate and reasonable. Although the agency had never had an occasion to implement a teach-out plan, the agency adopted new policies and procedures related to this area in response to the staff analysis.

The agency's revised policies related to teach-out plans are found in its Accreditation Handbook under Section G.III.N, Teach-out Plans and Teach-out Agreements, which staff verified is also available on the agency's Web site. The policy describes what a teach-out plan is, describes what the plan must include, specifies that the agency must approve the plan, and describes the agency's procedures for reviewing a plan. Section 1(c) of the policy requires that the plan must include a detailed listing of additional charges that will result from the implementation of a plan and how students will be informed of these charges. If the institution participates in Title IV programs, it must explain how it will arrange for the continuity of financial aid services, and if such services will no longer be available, how students will be informed of the cessation of financial aid. A school that is unable to fulfill its obligations to its students must enter into a teach-out agreement with institutions offering similar programs that are offered within reasonable geographic proximity in order that students will not have to move or travel substantial distances.

As stated previously, the agency has never had an occasion to implement a teach-out plan. However, as documentation the agency provided Board meeting minutes noting the discussion of the topic, background information that was considered by its Board, a copy of its newly-developed teach-out application, and the template that its Board would use to evaluate such a plan.

The agency's report has satisfactorily addressed the findings identified in the staff analysis, and no additional information is requested.

(5) The agency must require an institution it accredits or preaccredits that enters into a teach-out agreement, either on its own or at the request of the agency, with another institution to submit that teach-out agreement to the agency for approval. The agency may approve the teach-out agreement only if the agreement is between institutions that are accredited or preaccredited by a nationally recognized accrediting agency, is consistent with applicable standards and regulations, and provides for the equitable treatment of students by ensuring that--

(i) The teach-out institution has the necessary experience, resources, and support services to--

(A) Provide an educational program that is of acceptable quality and reasonably similar in content, structure, and scheduling to that provided by the institution that is ceasing operations either entirely or at one of its locations; and

(B) Remain stable, carry out its mission, and meet all obligations to existing students; and

(ii) The teach-out institution demonstrates that it can provide students access to the program and services without requiring them to move or travel substantial distances and that it will provide students with information about additional charges, if any.

At the time of its last review, the agency was requested to demonstrate that it has a process for approving teach-out agreements between institutions. As noted in the previous section, although the agency had never had an occasion to implement a teach-out agreement, the agency adopted new policies and procedures related to this area in response to the staff analysis.

The agency's revised policies related to teach-out agreements are found in its Accreditation Handbook under Section G.III.N., Teach-out Plans and Teach-out Agreements, which staff verified is also available on the agency's Web site. The policy describes a teach-out agreement and specifies that any institution that enters into a teach-out agreement must submit the agreement to the agency for approval. The policy specifies that the agency will approve the agreement only if it is between institutions that are pre-accredited/accredited by a nationally recognized accreditor, is consistent with applicable standards and regulations, and provides for the equitable treatment of students. The teach-out institution must have the necessary experience, resources, and support services to provide a reasonably similar educational program and remain stable, carry out its mission, and meet all of its obligations to its current students. The teach-out institution must also be able to demonstrate that it can provide access to its program and services without requiring the teach-out students to move or travel substantial distances and must also provide students information about any additional charges that they will incur.

The agency requires that teach-out agreements be submitted and approved prior to implementation. The program/institution must submit a Teach-out Plan and Agreement Application to the agency. The application form will be reviewed by an ARC, which will provide a report to the Board. The Board will approve or deny the application and notify the institution within 90 days.

As stated previously, the agency has never had an occasion to implement a teach-out agreement. However, as documentation the agency provided a copy of its newly-developed teach-out application and the template that its Board

would use to evaluate such an agreement.

The agency's report has satisfactorily addressed the findings identified in the staff analysis, and no additional information is requested.

PART III: THIRD PARTY COMMENTS

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