

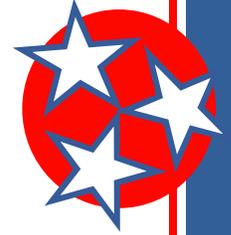
**Division of Postsecondary School Authorization
Tennessee Higher Education Commission**

2013 Workshop and Roundtable Discussion

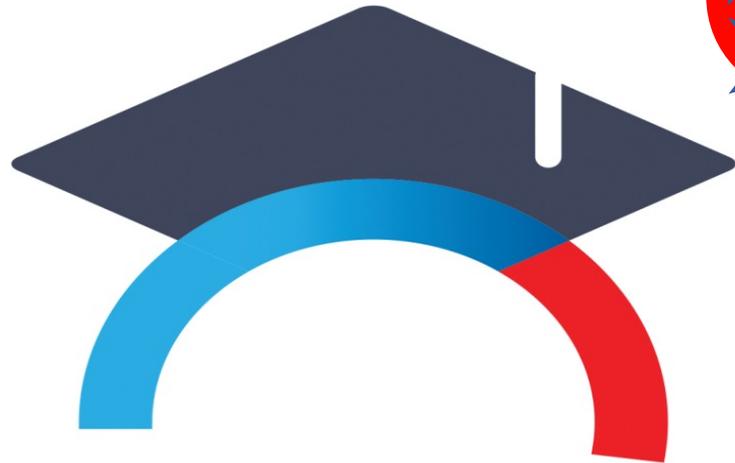
**September 17 and 18, 2013
10:00am – 4:00pm**



Agenda

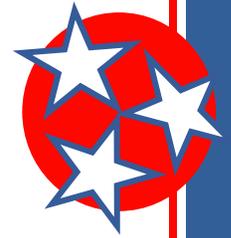


- 9:00 – 10:00 Registration (Continental Breakfast Provided)
- 10:00 – 10:30 Welcome and Drive to 55 Information
- 10:30 – 11:15 Reauthorization
- 11:15 – 12:00 Audits
- 12:00 – 1:30 Lunch (Provided)
- 1:30 – 2:45 Complaints
- 2:45 – 3:30 Rules
- 3:30 – 4:00 Questions and Answers



Drive **to 55**
Mission:
Workforce
Ready.

www.driveto55.org



Reauthorization



Reauthorization - Important Dates



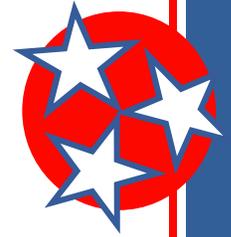
- If your institution intends to seek a waiver of the financial audit requirement in 1540-01-02-.14, the request must be submitted by October 1, 2013.
- If your institution needs to request an extension to file the application, the request must be submitted by October 1, 2013 and must include:
 - The reason for the request,
 - A requested due date, and
 - The \$500 extension fee.
- The Reauthorization Application must be postmarked by October 15, 2013.
 - The application is for authorization to operate from July 1, 2014 thru June 30, 2015.
 - The reporting year is July 1, 2012 thru June 30, 2013.

Receipt of the Reauthorization Application



- Application Distribution:
 - DPSA emailed the application to the Institutional Directors on August 16, 2013.
 - If your institution had students who carried over to this reporting period, your institution also received a prepopulated Appendix 3. The prepopulated document was sent via secure mail to protect student information.
 - Secure emails are not accessible after 14 days.
 - Secure email attachments are accessible only by the original recipient.
 - If you have not seen the application, please check the director's email address and the spam or junk mail to ensure receipt of the application.
 - If you received a secure email and did not save the attached documents within 14 days, contact Diby Kouadio at diby.kouadio@tn.gov.

Changes to the Reauthorization Application



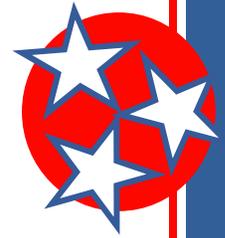
- Changes have been made to the 2014-2015 Reauthorization Application. Please review the application and appendix instructions carefully. For example:
 - Some appendices have been renumbered, such as the Master Student Registration List which is now Appendix 11.
 - Institutions that provide 100% distance education are required to provide a data protection plan rather than a fire inspection.
 - Some appendices have been removed. Specifically, agent and bond information will no longer be collected as part of reauthorization, but will be reviewed and information requested as needed on an on-going basis.
 - For institutions that receive Title IV funds, the application specifies that the institution must provide the 2-year cohort default rate.

Reauthorization - Collected Data



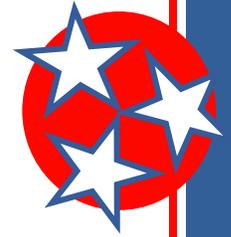
- Withdrawal, Placement, and Completion Information
- Board/Licensure Passage Rates – This applies to any program leading to employment in a field where licensure/certification is required, such as, certified nursing assistant.
- Student Demographic Information (race, gender and date of birth)
- Student Employment Information
 - On the Master Student Registration List (Appendix 11), the spreadsheet contains columns for employment information at the time of enrollment, if collected.
 - On Appendix 3, the spreadsheet contains columns for current employment information for any student marked placed.
 - The information provided for the appendices could be the same or different.
- Gross Tuition
 - Amount of Tuition Received from All Students for In-State Institutions
 - Amount of Tuition Received from Tennessee Students for Out-of-State Institutions
- 2-Year Cohort Default Rate of Title IV Institutions

Reauthorization - Collected Documents



- Catalog
- Enrollment Agreement
- Pre-Enrollment Checklist
- Transcripts
- Financial Statements
 - Statements may be audited, compiled, reviewed, or prepared by the institution depending on the institution's gross tuition collected.
- Student Funding Sources
 - Examples include federal loans, in-house funding, Workforce Investment Act funds, veterans' benefits, scholarships, etc.
- In-House Funding Documentation
- Data Protection Plan (for 100% distance education providers) or Fire Inspection
- Website Compliance Statement
- Lease for Institution and Student Housing
- Organizational Chart, if applicable
- Annual Report Filed with the Tennessee Department of State

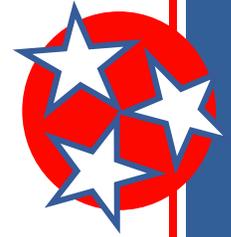
Reauthorization Tips



- If you have not acknowledged that you received the application, please do so immediately following this training.
- Be sure to sign and notarize all documents as requested.
- Regardless of the form of your financial statements (audited, compiled, reviewed, or self-prepared), you must complete the Financial Cover Page.
- For institutions submitting actual transcripts, be sure to black out protected information and provide a separate transcript for a student who is currently enrolled, has withdrawn, and has graduated.
- Verify that all CD's are labeled and that files have been properly saved to the CD and can be opened without failure.



Reauthorization Tips

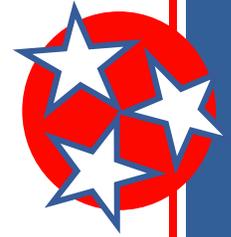


- Ensure what you represent in your application is actually used in practice. For example, a provided enrollment agreement should be utilized by the institution.
- As to the Website Compliance Statement, be sure to review your website before completing either the Director's Statement of Compliance or Director's Statement of Intent to Achieve Compliance.
- The institution must provide the names of two individuals - Institutional Director and an alternate on-site contact. The institution may also provide a corporate contact. If the corporate contact is on-site, then the corporate contact and alternate on-site contact may be the same person.
- If an appendix is not applicable to your institution, include on a separate sheet a statement that the appendix is not applicable and explain why.
- Do not submit excel spreadsheets in PDF.



Reauthorization – Appendix 3

- DPSA monitors the withdrawal and placement rates collected from institutions during the annual reauthorization period.
- Any program offered by an institution that does not maintain one of the following rates will be monitored to determine whether any deficient rate is an indicator of poor educational quality:
 - Withdrawal rates in excess of 33%
 - Placement rates less than 75%



Appendix 3 Tips

- What Records to Include?
 - Completions occurring at anytime during the reporting year.
 - Withdrawals occurring at anytime during the reporting year.
 - Students who enrolled during the reporting year.
 - Students who enrolled earlier than the beginning of the reporting year, but who are still enrolled, completed, or withdrew during the reporting year.
- What Records to Exclude?
 - Exclude students who completed or withdrew prior to the beginning of the reporting year.
 - Exclude records of students whose entry dates occurred after the end of the reporting year.
 - Keep these records for the next fiscal year reporting.
- If in doubt, please call us, and DPSA research staff will be glad to assist you.



Reporting Year: July 1, 2012 - June 30, 2013

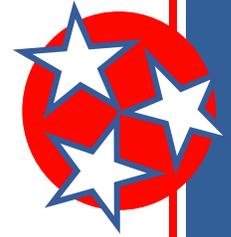


Appendix 3 Tips



- Student ID Number: Please use the same identification number maintained in your institution's records. This number should be used consistently on Appendices 3 and 11. The number may be a social security number or unique student ID generated by the institution.
- Race and Gender: This information is required. You should request this information from your students.
- Gender: The accepted codes are M for Male, F for Female. Please do not use W for Women.
- Date of Birth: Please check that DOB is within an acceptable range. Do not use a default date such as 1/1/1900.
- Program Code: Use the program codes assigned by DPSA.
- Date Entered: Double-check for accuracy and make sure that the entry date does not fall after the completion or withdrawal dates or after June 30, 2013.
- Date Completed or Withdrawn: Please double-check for accuracy, and ensure that the date is not earlier than the entry date, before July 1, 2012, or after June 30, 2013.

Appendix 3 Tips

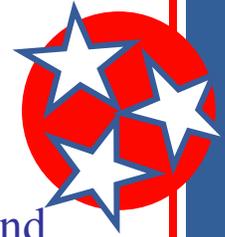


- Special Circumstance Withdrew (#): This does not apply if the student completed the program.
- Placed (Y/N): Please document if the student is employed. Make sure that you have documentation verifying the placement status of your withdrawals.
- Placed In Field (Y/N): Please document if the student is employed in the field. Make sure that you have documentation verifying the placement status of your withdrawals. If a student is placed in field, then the student is also placed.
- Special Circumstance Non-Placement (#): This is only applicable to non-placed students, but make sure you have documentation verifying the special circumstance.

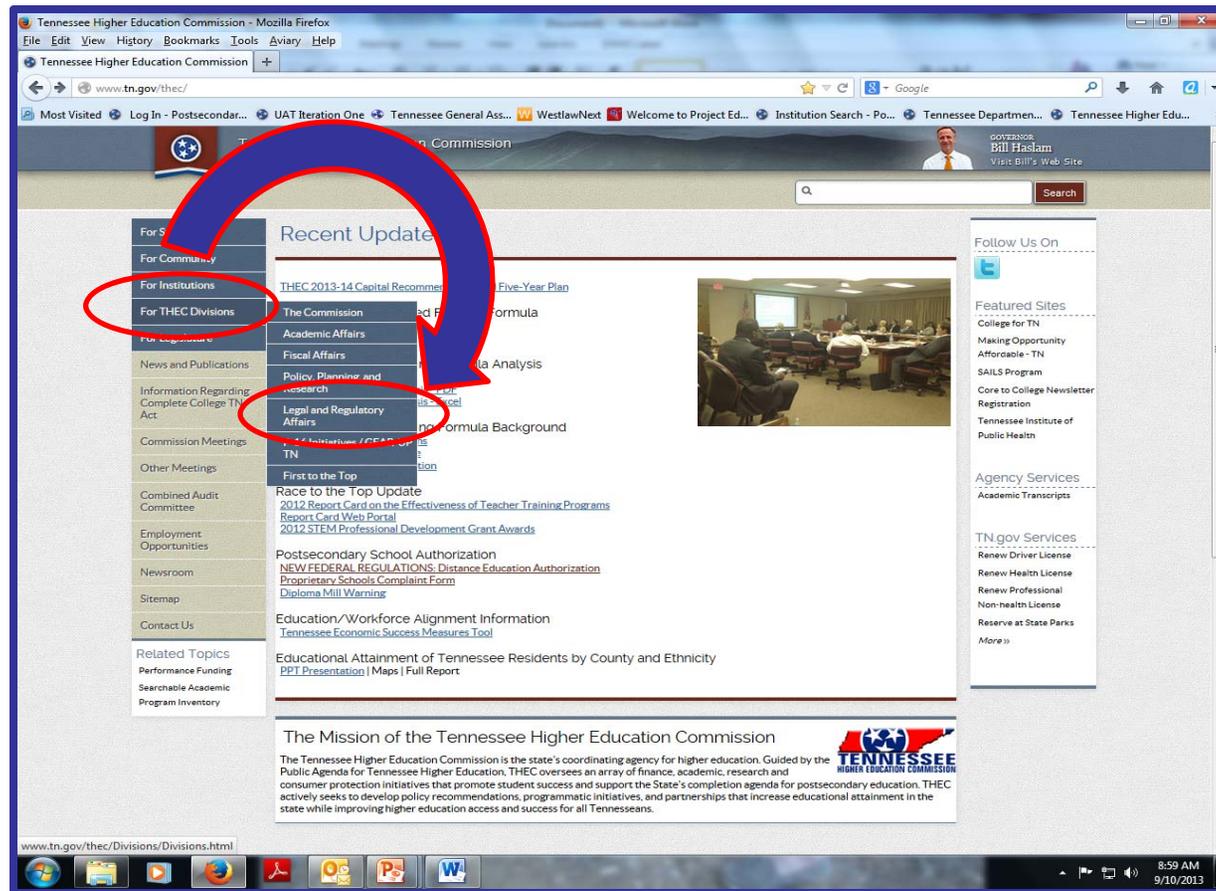


Institutions can update placement records based on information obtained up to the date the Reauthorization Application is completed.

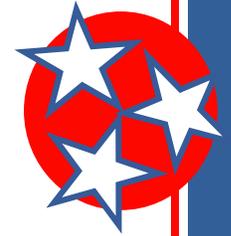
Reauthorization Codes



In various places throughout the application, you are asked to use the institution and program codes. If you do not know your institution code or program codes, go to www.tn.gov/thecc, click on “For THEC Divisions, then click on “Legal and Regulatory Affairs.”

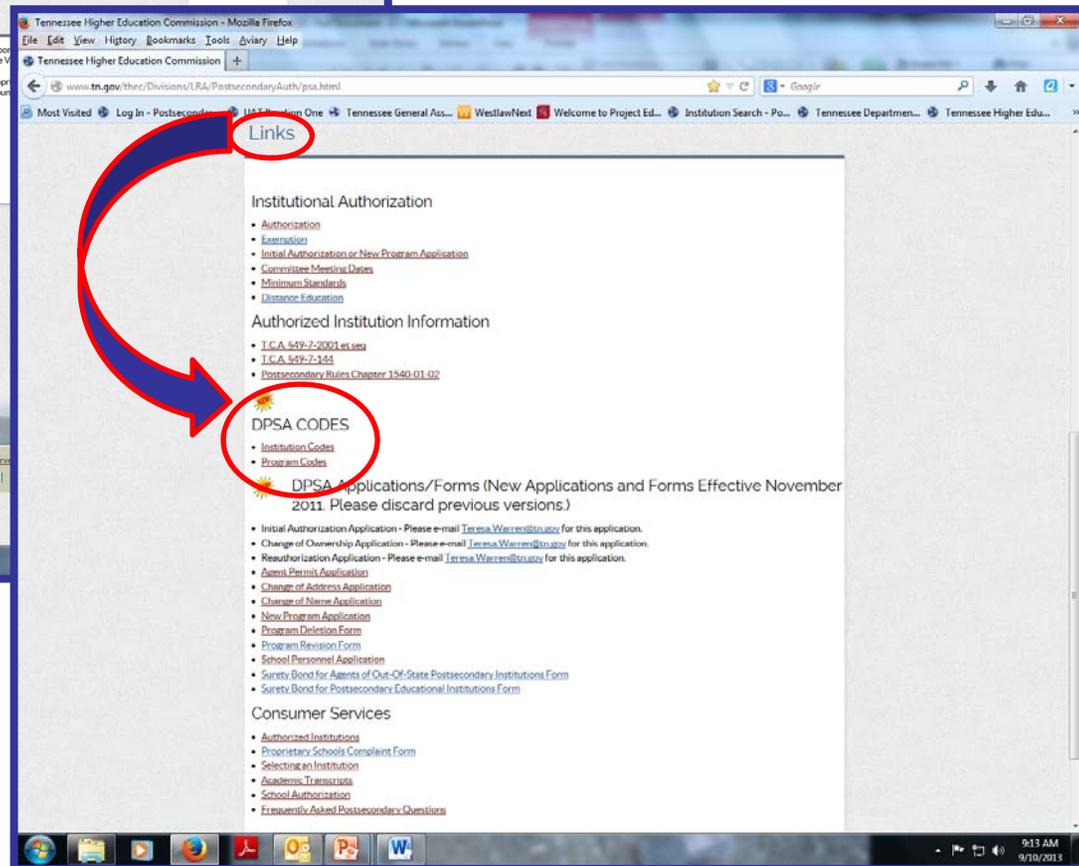
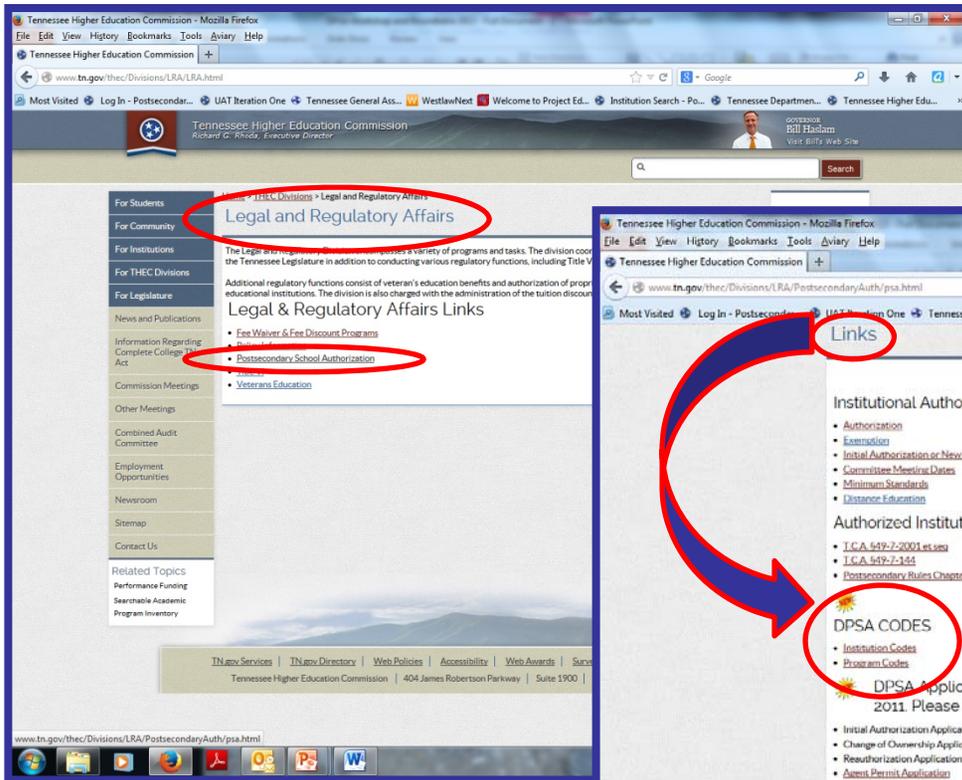


Reauthorization Codes

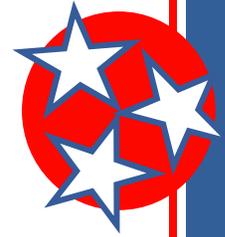


At the Legal and Regulatory Affairs screen, click “Postsecondary School Authorization” and scroll to the Links section of the page that comes up.

Choose either Institution Codes or Program Codes.



Reauthorization Codes



INSTITUTION CODES

(Effective as of 8/16/2013)

<u>CODE</u>	<u>INSTITUTION NAME</u>	<u>STREET ADDRESS</u>	<u>CITY</u>
1614	A+ Nurse Aide Training	108 East McLean Street	Manchester
1206	Academy of Allied Health Careers	5600 Brainerd Road	Chattanooga
1558	Academy of Make-Up Arts, LLC	1321 Murfreesboro Road	Memphis
1577	Advanced Nurse Assistant LLC	1135 Bell Rd	Memphis
1208	All Saints Bible College	930 Mason St.	Memphis
1210	Allied Health Careers Institute	1800 S. Rutherford Blvd	Memphis
1212	American Home Inspectors Training Institute, LTD	2814 Stage Center Blvd	Memphis
1213	American Red Cross	6921 Middlebrook Pkwy	Memphis



Program Codes by Institution

(All Data Current as of 8/27/2013)

A+ Nurse Aide Training (Institution Code: 1614)

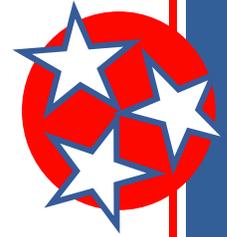
<u>Program Code</u>	<u>Program Name</u>	<u>Credential Offered</u>	<u>Program Status</u>
4455-12	Nurse Aide Training	Certificate of Completion	Active

Total Number of Programs for This Institution: 1

Academy of Allied Health Careers (Institution Code: 1206)

<u>Program Code</u>	<u>Program Name</u>	<u>Credential Offered</u>	<u>Program Status</u>
621-97	Cardiac Monitor Technician (EKG)	Certificate	Active
619-97	Clinical Medical Assistant	Certificate	Active
625-10	Clinical Medical Assistant/Billing & Coding Specialist	Certificate	Active
623-08	Medical Billing & Coding	Certificate	Active

Reauthorization Withdrawal Rate Calculations



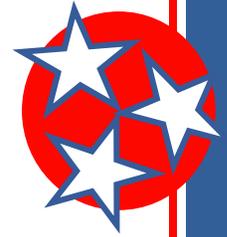
	Institution Total
Student Population	185
Still Enrolled	9
Percent Still Enrolled	4.9%
WITHDRAWAL SUMMARY	
Total Withdrawals	18
Special Circumstance Withdrawals	9
Withdrawal Rate	4.9%

Special Circumstances for Withdrawals:

- Health related situation
- Family emergency
- Death
- Incarceration
- Full-Time military service
- Job relocated/transferred
- Transferred to a different program at your institution



Reauthorization Withdrawal Rate Calculations



	Institution Total
Student Population	185
Still Enrolled	9
Percent Still Enrolled	4.9%
WITHDRAWAL SUMMARY	
Total Withdrawals	18
Special Circumstance Withdrawals	9
Withdrawal Rate	4.9%

Calculation of Withdrawal Rate:

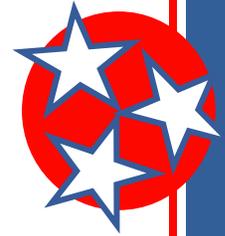
Step 1: Total Withdrawals Minus Special Circumstances Equals Actionable Withdrawals

$$18 - 9 = 9$$

Step 2: Actionable Withdrawals Divided by Student Population Multiplied by 100 Equals the Withdrawal Rate

$$9 / 185 * 100 = 4.9\%$$

Reauthorization Placement Rate Calculations



	Institution Total
--	-------------------

PLACEMENT SUMMARY

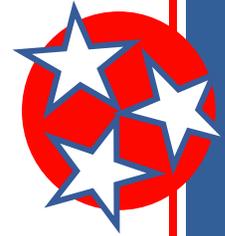
Total Placeable	145
Special Circumstance Non-Placements	13
Placed Withdrawals	0
Total Placed In-Field	138
In-Field Placement Rate	95.2%
Total Placed	142
Placement Rate	97.9%

Special Circumstances for Non-Placements:

- Health related situation
- Family emergency
- Death
- Incarceration
- Full-Time military service
- Job relocated/transferred
- Continuing education at your institution
- Continuing education at a different institution
- Pending fulfillment of licensure requirements
- International students - unable by law to work
- Student could not be contacted/Refused employment



Reauthorization Placement Rate Calculations



	Institution Total
--	-------------------

COMPLETION SUMMARY

Total Exiters (Not Currently Enrolled)	176
Total Completions	158
Completion Rate	94.6%

PLACEMENT SUMMARY

Total Placeable	145
Special Circumstance Non-Placements	13
Placed Withdrawals	0
Total Placed In-Field	138
In-Field Placement Rate	95.2%
Total Placed	142
Placement Rate	97.9%

Calculation of Placement Rates:

Step 1: Total Completions Minus Special Circumstances Equals Total Placeable

$$158 - 13 = 145$$

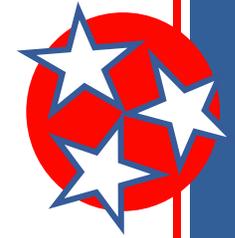
Step 2: Total Placed In-Field Divided by Total Placeable Multiplied by 100 Equals the In-Field Placement Rate

$$138 / 145 * 100 = 95.2\%$$

Step 3: Total Placed Divided by Total Placeable Multiplied by 100 Equals the Placement Rate

$$142 / 145 * 100 = 97.9\%$$





Audits



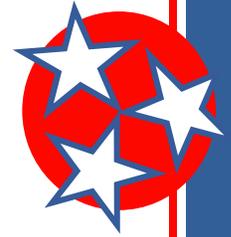
Site Audit Procedures



- Each institution is subject to random audits to verify information submitted in its annual reauthorization application and compliance with THEC's regulations.
- Selection of Institutions:
 - Audits conducted on randomly selected authorized institutions each year; and/or
 - Institutions with five or more student complaints
- Notification:
 - In-state institutions will be given 3 business days advance notice.
 - Out-of-state institutions will be given 10 business days to submit the requested documentation.
 - The Institutional Director will be the primary contact. An email will be sent to Institutional Director with a message asking the director to confirm receipt and verify the attachment can be opened.

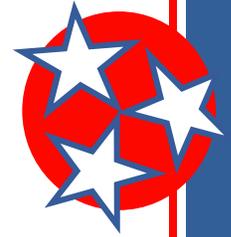


Site Audit Procedures



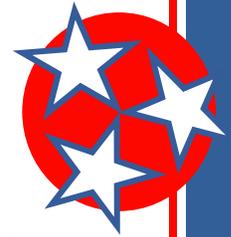
- Audit Sample:
 - 30 random files
 - If less than 30 students, 100% of files
 - 100% of placement and withdrawal exceptions
- Students' files must be ready for inspection upon the audit teams arrival.
- If the required records for the 30 random files are kept in multiple files, then all files must be presented at the beginning of the audit.
 - Example: If transcripts are in academic files and the enrollment agreements are in the financial aid files, both files must be presented to the audit team at the beginning of the audit.
 - Example: If transcripts are stored electronically, then they should be printed off prior to the audit team arrival.

Record Keeping Requirements



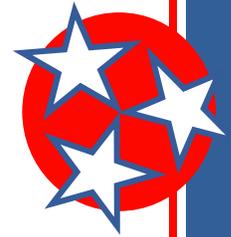
- Institutional files shall be maintained according to Rule 1540-01-02-.15, and the audit team will be checking for the following items:
 - Documentation for the basis of admission
 - Pre-enrollment checklist (required if the checklist items are not in the enrollment agreement)
 - Enrollment agreement
 - Transferability of credits disclosure statement (T.C.A. § 49-7-144)
 - Copy of student transcript or certificate of completion from your institution.
 - Documentation of all special circumstances placement and withdrawal exceptions

Most Common Site Audit Findings



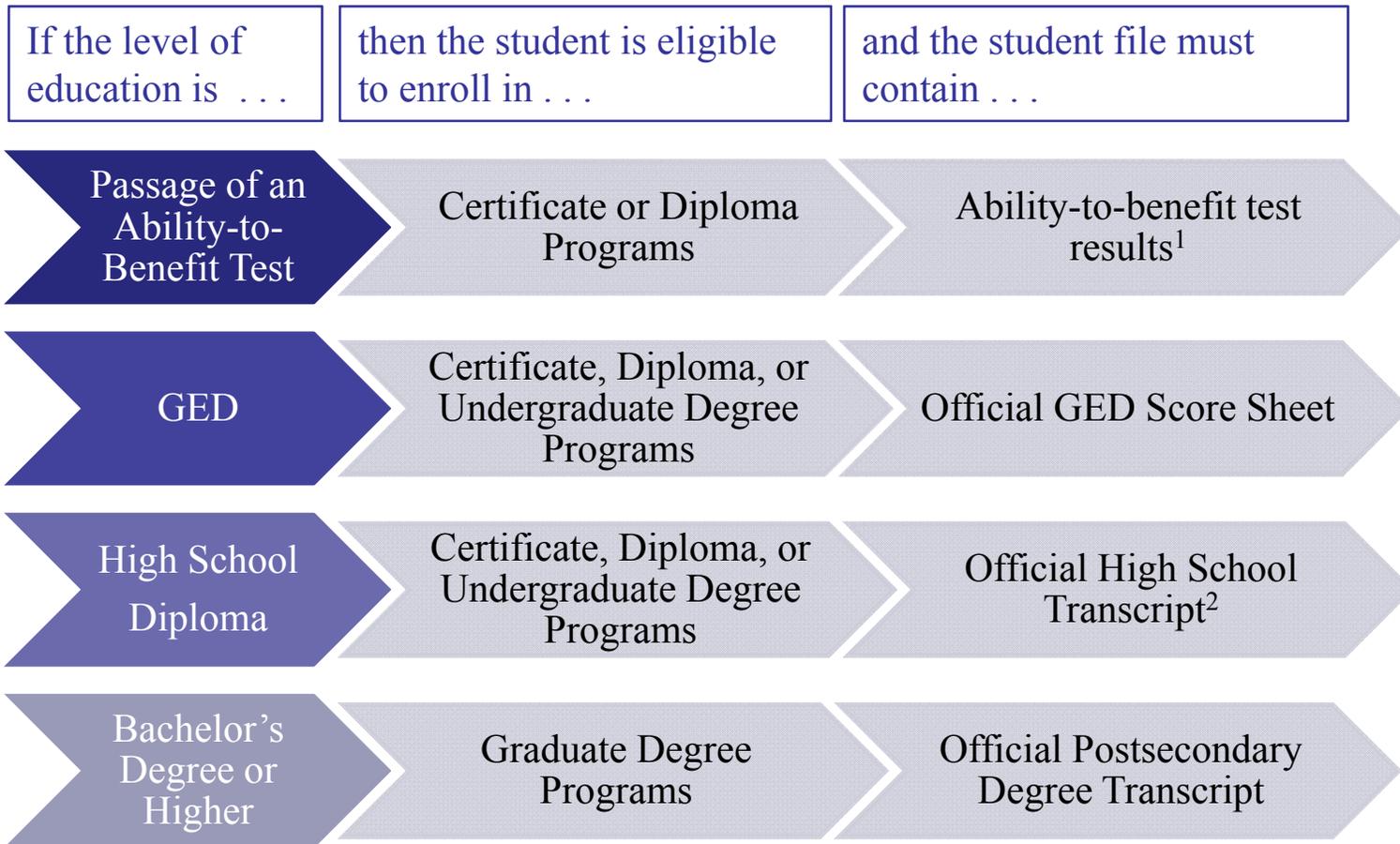
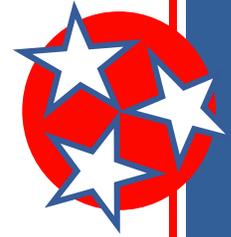
- There is no documentation for the basis of admission. (Rule 1540-1-2-.15(6)(b))
- There is no pre-enrollment checklist or unsigned pre-enrollment checklist. (Rule 1540-1-2-.15(6)(c))
- There is no enrollment agreement or unsigned enrollment agreement. (Rule 1540-1-2-.15(6)(d))
- The transfer of credit disclosure is missing, not compliant or not executed by the student. (T.C.A. § 49-7-144)
- There is no institution transcript or certificate of completion for your institution in the file. (Rule 1540-1-2-.15(6)(e) & (8))
- No documentation for a special circumstance withdrawal or placement exception.
- Miscoded withdrawal or placement exception.

Best Practices for Basis of Admission



- An official high school transcript or GED score sheet shall be maintained in the student's file, not a copy of the high school diploma or GED certificate. An official high school transcript or GED score sheet must be:
 - Signed by institutional official or have an official seal or
 - If faxed or emailed, the transcript or GED score sheet should include a cover letter or cover sheet from issuing institution/agency attesting that the email or fax copy is an official transcript or GED score sheet.
- High school transcripts and GED score sheets that are stored electronically must be accompanied by documentation that verifies the transcript was received directly from the issuing institution/agency.

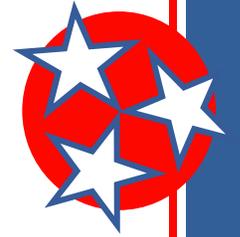
Best Practices for Basis of Admission



¹ The test should be one previously approved by the U.S. Department of Education or DPSA.

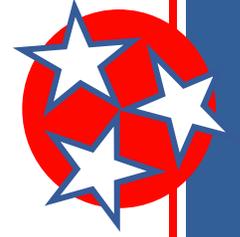
² Other evidence of receipt of a high school diploma is a postsecondary transcript indicating the student graduated from high school or official military papers such as the Enlisted Record Brief (ERB).

Best Practices for Special Circumstance Exceptions



- Ensure that the code reported in Appendix 3 matches the documentation in the student's file.
- Make sure the file contains documentation that supports the exception.
 - If the reported exception is not supported by appropriate documentation, it will be converted to a “0” and excluded from the institution's exceptions.

Withdrawal Exception Categories



1. Health Related Situation
2. Family Emergency
3. Death
4. Incarceration
5. Full-Time Military Service
6. Job Relocated/Transferred
7. Transferred to a Different Program at Your Institution

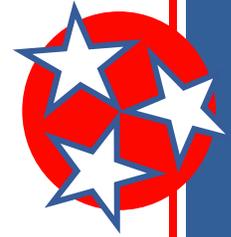
Placement Exception Categories



1. Health Related Situation
2. Family Emergency
3. Death
4. Incarceration – For example, four days of booking information for the Montgomery County Sheriffs Department is available at <http://www.mcgtn.org/sheriff/booking>.
5. Full-Time Military Service
6. Job Relocated/Transferred
7. Continuing Education at Your Institution
8. Continuing Education at a Different Institution
9. Pending Fulfillment of Licensure Requirements
10. International Student – Unable by Law to Work
11. Student Could not be Contacted/Refused Employment



Sample Form



WITHDRAWAL FORM

Today's Date: _____
Name: _____ S.S. #: _____
Address: _____
City, State and Zip: _____ Phone #: _____
Last Date of Attendance : _____
Reason for withdrawal: _____

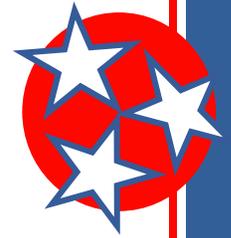
(mark one of the below options and explain on the above line)

- No special reason
- Health Related Situation
- Family Emergency
- Death
- Incarceration
- Full-time Military Service
- Job Relocated / Transferred
- Transferred to a Different Program at

Interviewer's Signature

Student's Signature

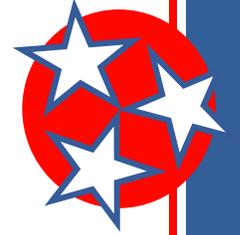
Who completed this form if not filled out by the student? Why? _____



Complaints

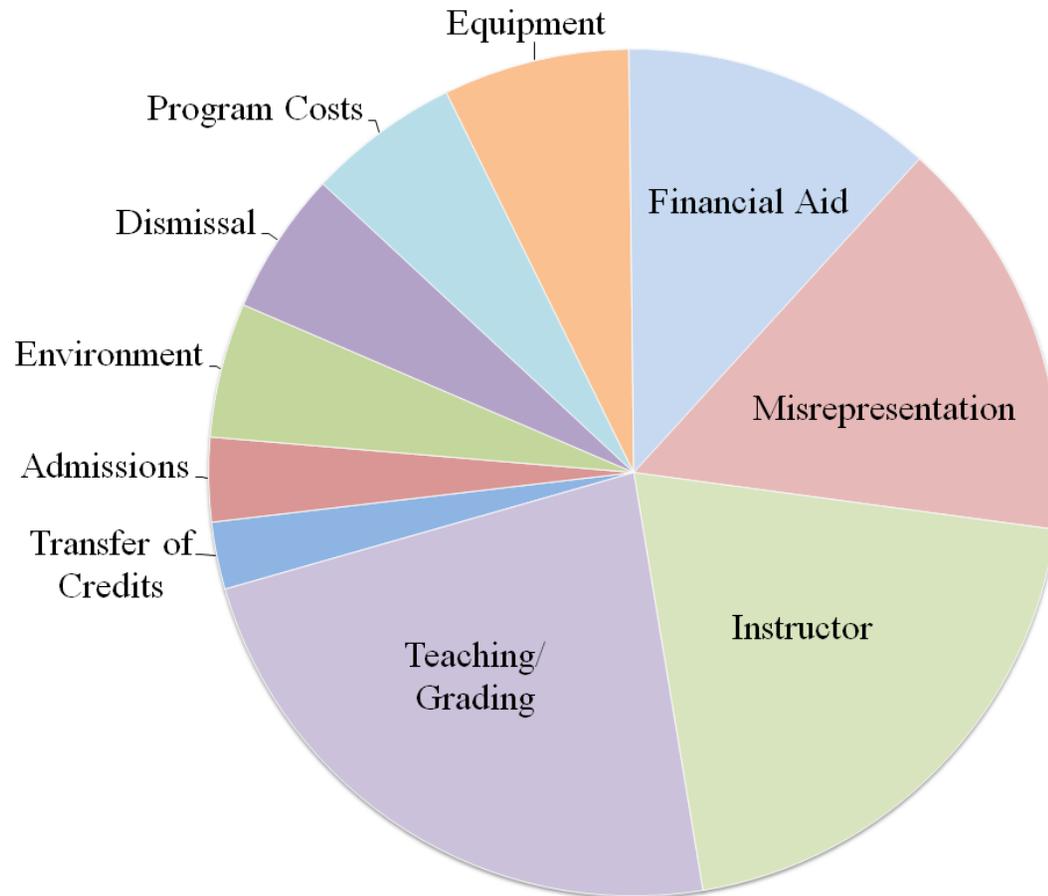
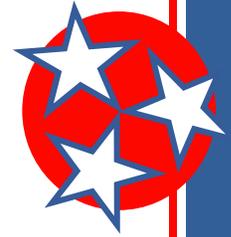


Complaints



- The investigation of complaints against institutions is one of the most important functions performed by this agency.
- Sources of complaints:
 - Student
 - Concerned Parents
 - Elected Officials
 - Better Business Bureau
 - Other State Agencies
 - Employees of an Institution

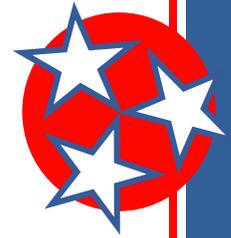
Complaints



Formal Complaint Issues Since 2011

- Financial Aid (11.9%)
- Improper Dismissal (5.5%)
- Instructor Concerns (20.3%)
- Teaching and Grading (23.2%)
- Misrepresentation (15.4%)
- Admissions (3.2%)
- Equipment or Instructional Supplies (7.1%)
- Program Cost (5.8%)
- Poor or Hostile Learning Environment (5.1%)
- Transfer of Credits (2.6%)

The Complaint Process

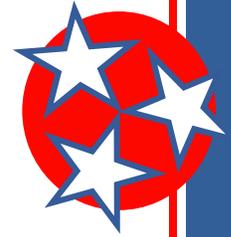


During initial contact with a complainant, DPSA will suggest that the complainant contact the Institutional Director in an effort to resolve the complaint. DPSA then sends a follow-up email to the complainant confirming the conversation, restating the suggestion to contact the Institutional Director (including contact information), and providing an explanation of the complaint process. As a courtesy, the Institutional Director is copied on this email.

In the event the complaint is not resolved at the institutional level, DPSA requires the complaint be submitted in writing. When DPSA receives a written statement the following process is initiated.



The Complaint Process

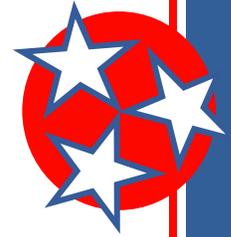


After receiving a written statement, DPSA reviews the complaint and sends the institution a copy of the complaint and a letter listing the allegations raised in the complaint and requesting a response to the allegations and specific documents.

The institution's response to DPSA should fully address DPSA's requests and include any additional documentation needed to support the institution's position. The response needs to be received no later than the date specified in DPSA's initial request.



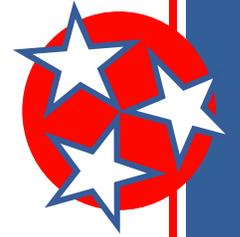
The Complaint Process



Additional requests for information or documents may be requested and site visit(s) may be used as part of the investigation process for determining the outcome of a complaint.

DPSA will review all information and determine if there have been any violations of Tennessee statutes, rules or institutional policies. Every attempt is made to resolve the dispute between the parties. If no resolution is reached, DPSA will then issue its findings and conclusions in writing to all parties.

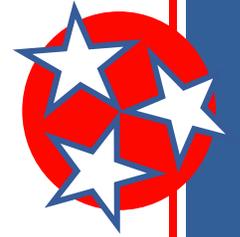
The Complaint Process



In the event that an institution or complainant is not satisfied with the determination made by DPSA, the party may seek further review by the Executive Director.



Complaints



How can my institution reduce or eliminate complaints filed with DPSA?

Resolve Within

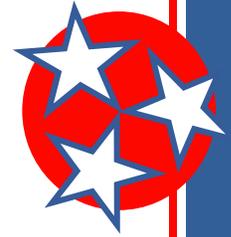
Write with Ink

Arm with Information



Complaints

Hypotheticals



Number 1:

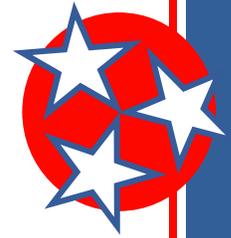
Due to a family emergency a student leaves town during the externship portion of the Medical Assistant Program. Five years later the student contacts the school requesting to complete the externship. The admissions employee explains the student must retake the entire program and pay the full tuition cost. The student expected to incur some cost to complete the externship and receive a diploma, but had not expected to be required to retake the entire program and pay the full tuition cost.

Number 2:

Student is struggling academically. The institution informs the student that to successfully complete the program the student needs additional training which will result in additional tuition cost. The student is unable to pay the additional cost and files a complaint with DPSA. During the investigation process, DPSA learns that the institution did not follow its attendance policy or satisfactory performance policy and does not have a policy regarding additional training or the cost of additional training.

Complaints

Hypotheticals



Number 3:

Student is enrolled in the student's last course to complete the required credit hours toward an MBA degree program; however, the institution informs the student that one additional class is required in order to graduate. The student believes this to be incorrect and contacts DPSA.

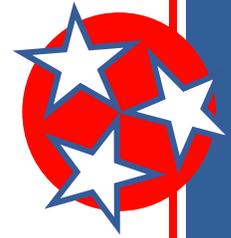
During the investigation process, DPSA learns that after completing part of the program the student received a certificate and that this may have changed his enrollment. However, it is unclear whether the institution informed the student of this change at the time the student elected to receive the certificate.

Number 4:

Student enrolls in a residential program; however, a few months into the program the institution notifies the student that the student must now complete the program course work online or as an independent study course. Student specifically enrolled with the understanding that all the instruction would be conducted in a classroom with an instructor.

Complaints

Hypotheticals



Number 5:

Student alleges improper dismissal and contends the institution failed to follow its grievance policy. Upon investigation, DPSA learned that the student was properly dismissed; however, not all persons involved with the incident were present at the grievance committee meeting.

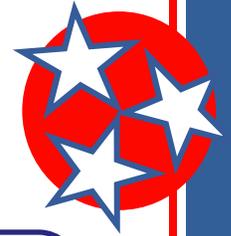
The institution's grievance policy states that the grievance committee will be composed of the Campus President, appropriate department heads, and any other individuals whose participation is warranted by the circumstances of the particular concern. The policy further states that all persons involved with the incident must be present at the time of the meeting.



Rulemaking



Review of Past Rulemaking Proceedings



2008

- A new set of revisions were created and became effective (2008 Rules).

2011

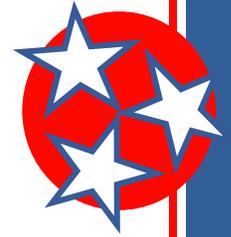
- The Commission started a rulemaking proceeding to revise the 2008 Rules (2011 Revisions).
- The 2008 Rules were declared void by a court for procedural reasons.

2012

- The Commission voted to withdraw the 2011 Revisions because those revisions revised the 2008 Rules that the court declared void.
- The Commission began a new rulemaking proceeding (2012 Rulemaking Proceeding).



2012 Rulemaking Proceeding



In early 2012, DPSA met with institutions and received comments from 19 entities –most were institutions, but some were organizations. Thereafter, DPSA proposed revisions to the Committee and Commission.

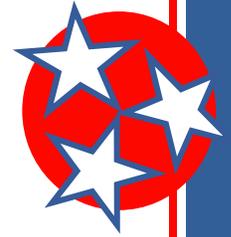
In April, the Commission voted to adopt rule revisions. THEC submitted the revisions to the Attorney General; who signed off on the rules. The revisions were submitted to the Governor's office.

After receiving notice from the Governor's office, DPSA sent the revisions to the Secretary of State. The Secretary listed June 29, 2013 as the deadline for requesting a rulemaking hearing and September 28, 2013 as the effective date of rules.

In June 2013, the Government Operations Committees gave the rules a favorable recommendation. Thereafter, National College of Business & Technology and several other interested parties filed a Petition for a Public Hearing.

In July 2013, the Commission voted unanimously to withdraw the rules and begin a new process using the rulemaking hearing process. Notice of the withdrawal was sent to all petitioners and authorized institutions.

Where Do We Go From Here?



DPSA encourages institutions to offer constructive comments as to how the rules may be revised to better serve the purpose of the 1974 Postsecondary Education Authorization Act to provide for the protection, education and welfare of the citizens of this state, its postsecondary educational institutions and its students. Comments should be mailed to the attention of Julie Woodruff or emailed to julie.woodruff@tn.gov.

