

## **POLICY AND PROCEDURE FOR PROCESSING COMPLAINTS INITIATED AGAINST ACCET ACCREDITED INSTITUTIONS**

**PURPOSE:** The purpose of this policy document is to establish a standard method for processing complaints involving ACCET standards, policies, and procedures about a member institution or an institution whose submitted application for initial accreditation remains active.

**POLICY REQUIREMENTS:** Accreditation is a partnership for quality in which an institution must meet established standards of educational quality. Toward that end, ACCET accredited institutions are responsible for maintaining ongoing compliance with the ACCET Standards for Accreditation and must inform participants of their right to communicate with ACCET regarding complaints relative to noncompliance with those standards. Accordingly, accredited institutions will:

1. Maintain a reasonable internal grievance policy to receive and resolve complaints, and disclose said policy in written form to all students at the time of enrollment.
2. Notify ACCET in writing within ten (10) days of any action or complaint filed against it by a governmental agency having regulatory authority over it, furnishing with the notification a copy of the items filed against it. (Refer to ACCET Document 48 - Policy on Adverse Actions by Other Agencies.)
3. Inform participants of their right to contact ACCET with a complaint; make available ACCET Document 49.1 - Notice to Students: Complaint Procedure in a readily accessible, prominent location at the school; and furnish participants the email, telephone number, and address of ACCET.

### **PROCEDURES FOR PROCESSING A COMPLAINT:**

An accreditation staff member is designated as the Chair of the Complaint Review Committee, who is responsible for processing complaints. The Complaint Review Committee is comprised of the Executive Director and accreditation staff. This body may collectively resolve complaints by vote, as authorized by the Executive Director. Copies of complaints and all related documents will be placed in the institution's file upon resolution.

Complaints must relate to ACCET standards, policies, and/or procedures. Complaints may be written or oral and initiated by an identifiable or anonymous source, participant or non-participant, and/or ACCET.

Oral complaints will be routed to the Chair of the Complaint Review Committee, or other designated member of the accreditation staff, who will attempt to obtain the following: 1) name, email, telephone number, and address of the person calling; 2) name and location of the institution concerned; 3) caller's status with the institution; 4) names of individuals at the institution involved in the complaint; 5) details of the complaint; and 6) what was done to resolve the complaint prior to

calling. This information will be logged and dated. The complainant will be directed to furnish a written complaint within ten (10) days and will be informed that failure to do so may result in the determination that the complaint is not actionable and, therefore, will not be processed further. A verbal complaint may be processed without subsequent written notification if it is determined to be one with urgency, as defined below, upon conferral with the Executive Director. Anonymity will be honored for callers who do not wish to be identified; however, they must still furnish a complaint in writing per the above policy.

Complaints received in writing will be date stamped and routed to the Chair of the Complaint Review Committee for an initial determination of both relevance to ACCET standards, policies and procedures and may subsequently be reviewed with the Executive Director and/or the Complaint Review Committee for further consideration.

Anonymous complaints will be processed according to the policy and procedures outlined herein, and specific requests for anonymity by an identifiable source will be honored by all reasonable means. Complaints submitted anonymously must include substantive representation of all allegations relating to ACCET standards, policies, and procedures; otherwise, such complaints lacking sufficient detail may lead to a preliminary determination by ACCET staff that the complaint be dismissed. In such cases, a copy of the complaint will be forwarded to the institution along with a letter of notification indicating that the complaint was determined to be without merit.

Information received by ACCET not as a complaint, but which indicates that the accredited institution may be in violation of ACCET standards, policies, or procedures, will require ACCET to initiate a formal complaint based on that information. These complaints will be processed according to this policy.

A complaint analysis will be provided to the ACCET Accrediting Commission at each regularly scheduled Commission meeting to include complaints processed and/or received since the previous Commission meeting, as well as other such information the Commission may request.

#### **INITIAL DETERMINATIONS ABOUT A COMPLAINT:**

1. Upon receipt of a complaint, the Chair of the Complaint Review Committee will first determine if the matter involves ACCET standards, policies, and practices. If it does not, a written report will be made of such decision and the matter closed. The complainant(s) will be notified accordingly.
2. A further consideration in determining whether to process a complaint is the length of time since the alleged incident in the complaint occurred. Unless there are extenuating circumstances, a complaint from a former student or employee will not be processed, if the complainant has been separated from the institution for more than six months.

3. If the complaint relates to ACCET standards or policies, it will be determined to be a complaint with urgency or a complaint without urgency. A complaint will be deemed one with urgency if upon an initial review:
  - The basis of the complaint appears to be well founded;
  - The seriousness of the issues, degree of potential or actual harm, the number of individuals impacted, the past history of the institution, and/or the time-sensitivity of the allegations warrant an expedited resolution of the complaint.

### **COMPLAINTS WITHOUT URGENCY:**

Unless there are mitigating circumstances, complaints without urgency will be processed within the time frames identified below:

1. Within seven (7) calendar days of receipt of the complaint letter, ACCET will provide written notification to the institution summarizing the allegations contained therein as related to specific ACCET standards, policies, and procedures. A copy of the complaint letter will be included in the notification unless the complainant specifically requests anonymity. The notification letter will direct the institution to submit a written response addressing the allegations and, if appropriate, demonstrating its efforts to resolve the complaint. Any written notice from ACCET to an institution will be made by email or by other means from which the exact date of delivery can be proved. The institution's response will be due within ten (10) calendar days from the date the institution receives official notification from ACCET.
2. Following receipt by ACCET, the institution's response will be reviewed by the Complaint Review Committee to determine that:
  - a. The complaint was resolved by the institution, and the complaint will be closed in accordance with the policy described below;
  - b. The complaint is being resolved by the institution, in which case the matter will be regularly monitored by ACCET to conclusion;
  - c. Additional specific action or information is required of the institution, in which case ACCET will so notify the institution and continue to monitor to conclusion; or
  - d. The matter is of sufficient seriousness to require processing as a complaint with urgency.
3. If the institution fails to respond as directed, the complaint may be treated as one with urgency and processed accordingly.
4. Any complaint under this procedure not resolved within 90 days from its receipt by ACCET may be deemed a complaint with urgency and processed accordingly.

### **COMPLAINTS WITH URGENCY:**

1. If, upon conferral with the Executive Director and/or Complaint Review Committee, a complaint is deemed to be one with urgency, the processing of the complaint will be expedited.
2. Additional action may be required, in which case the Executive Director, or designee, will confer with the Chair of the Accrediting Commission to determine appropriate action, which may include:
  - a. Further reducing the notice and response periods and proceeding as in other cases;
  - b. Initiating an announced or unannounced on-site visit by a team of the number and composition appropriate to the circumstances, to be conducted under established procedures for such visits;
  - c. Issuing an Order for Show Cause under the procedures for show cause; and/or
  - d. Presenting the matter to the full Commission for review and action as it directs. Any complaint with urgency remaining unresolved 60 days after receipt by ACCET may be referred to the Commission.

In cases involving paragraphs (b) or (c) above, or where the institution has not demonstrated substantial progress leading to closure and/or resolution, the complaint will be forwarded to the Accrediting Commission at its next regularly scheduled meeting for further review and action.

### **COMPLAINTS INITIATED BY ACCET:**

1. ACCET may initiate a complaint against an institution upon receipt from any source of adequate information from which one may reasonably believe that a violation of ACCET standards or policies exists.
2. Upon learning of such information, ACCET will conduct a due diligence investigation to determine the credibility of the source and the seriousness of the possible violation. A written report of the findings will be made.
3. If a determination is made that a complaint be initiated by ACCET, the notification will be in writing with sufficient pertinent information to allow the institution to respond accordingly.

### **CLOSURE OF A COMPLAINT:**

The determination to close a complaint will be made by vote of the Complaint Review Committee, or in such cases that are referred to the Accrediting Commission, by vote of that body. A complaint may be closed specifying that the original allegations were found to be with full merit, partial merit, or without merit. Following a thorough review, a complaint will be closed with partial merit if only some of the original allegations are found to have merit and/or the validated allegation(s) is

determined to be minor in nature and scope, with no documented evidence of significant negative impact on students or other interested parties. The complainant and the institution will be notified in writing of the Committee's decision, normally within thirteen (13) calendar days of receipt of institution's response to the complaint. If no new or additional information is submitted by the complainant within ten (10) calendar days of receipt of the notification letter, ACCET will consider the complaint to be officially closed. A complaint may be reopened if information warranting such action is received.

### **ON-SITE REVIEW OF COMPLAINTS FILED AGAINST ACCET INSTITUTIONS:**

During an on-site evaluation visit to an institution seeking initial accreditation and reaccreditation, the team will consider complaints filed against the institution and received by ACCET during the application period for initial applicants and during the most recent accreditation period for accredited institutions. Included will be: (1) complaints closed with merit and/or partial merit, (2) open complaints for which the institutions received notice and an opportunity to respond, and (3) any open complaints alleging fraud and/or falsification, if upon initial review the basis of the complaint appears to be well founded. Complaints filed since the last grant of accreditation will also be considered during Quality Assurance Visits (QAVs). The team will receive a summary complaint report identifying, at a minimum, the number of complaints filed against the institution, the names of the complainants, the dates of complaint submissions, the subject/nature of the complaints, the ACCET standards involved, and the complaint resolution (e.g. closed with merit, partial merit, no merit). In evaluating the institution's compliance with ACCET standards, the team will include an assessment as to whether the issues raised in the complaint(s) persist and whether there is any pattern(s) of complaints. If warranted, the team's review of any complaints will be addressed under the relevant ACCET standard(s) in the team report prepared by the team.