

Petition Submitted by the Pennsylvania State Board for Vocational Education

As required under CFR Title 34, Part 603, Subpart B for the US Department of Education Secretary's recognition of the Pennsylvania State Board for Vocational Education as a State agency that is a reliable authority as to the quality of public postsecondary vocational education in the State of Pennsylvania.

The Petition describes how the Pennsylvania State Board for Vocational Education meets the criteria set forth in CFR Title 34, Part 603.

Agency: Pennsylvania State Board For Vocational Education (PSBVE)

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Title 34 – Education

DEPARTMENT OF EDUCATION

PART 603 – SECRETARY'S RECOGNITION PROCEDURES FOR STATE AGENCIES

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Subpart B – Criteria for State Agencies Section

Section 603.24 Criteria for State Agencies.

(a) Functional aspects. The functional aspects of the State agency must be shown by:

(1) Its scope of operations. The agency:

(i) Is statewide in the scope of its operations and is legally authorized to approve public postsecondary vocational institutions or programs;

Pennsylvania has approximately 81 occupational or comprehensive institutions, which include 23 high schools and 58 other vocational-technical schools offering public postsecondary vocational education to approximately 18,229 participating adults enrolled in 552 non-degree programs across the state.

The Pennsylvania State Board for Vocational Education (PSBVE) and the Bureau of Career and Technical Education (BCTE) have their legal authorization established in the Pennsylvania Statutes under Title 24, Education, Chapter 1, Public School Code of 1949, Article 18, Vocational Education, (A) School Districts.

Collectively, these statutes give the PSBVE powers, duties and jurisdiction to supervise the public institutions that offer Public Postsecondary Vocational Education (PPVE) and to formulate and adopt curricula, courses of study and other instructional aids necessary for the adequate instruction of PPVE.

Additionally, these statutes give the PSBVE powers over the Bureau of Career and Technical Education which is designated as the Bureau for assuring federal and State standards are met. The PSBVE, through the PA Secretary of the Department of Education, authorizes the BCTE to manage the state's accreditation program.

The statutes also require the State Board for Vocational Education to report annually to the Governor and Legislature. These reports include data and information related to PPVE programs and institutions that are approved or in the process of being approved by the PSBVE. This information is used for the purpose of making allocation decisions, as well as the information required by the Secretary of the Pennsylvania Department of Education. The Adult Affidavit Program Registration Report (AAPR) and Consolidated Annual Report (CAR) are two key documents used during these reviews.

Documentation:

Attachment A	Pennsylvania Statutes – Title 24, Education, Chapter 1, Public School Code of 1949, Article 18, Vocational Education, (A) School Districts, 18-1803
Attachment B	List of Career and Technical Institutes in Pennsylvania

- (ii) **Clearly sets forth the scope of its objectives and activities, both as to kinds and levels of public postsecondary vocational institutions or programs covered, and the kinds of operations performed;**

Pennsylvania Career and Technical Institutes offer programs in the following cluster areas:

- Agriculture, Food and Natural Resources
- Architecture & Construction
- Arts, A/V Technology & Communications
- Business, Management & Administration
- Health Science
- Hospitality & Tourism
- Human Services
- Information Technology
- Law, Public Safety & Security
- Manufacturing
- Marketing, Sales & Service
- Science, Technology, Engineering & Mathematics
- Transportation, Distribution & Logistics

Pennsylvania vocational objectives include the following:

- All students who reach the state-defined threshold level of career and technical education will master the knowledge and skills that meet the program defined academic standards to complete an adult career and technical education program.
- All students who reach a state-defined threshold level of career and technical education to complete an adult program will attain the knowledge and skills that meet program defined and industry validated career and technical skill standards.
- All students who reach a state-defined threshold level of career and technical education will attain a diploma, certificate or other formal awards.
- All students who reach the state-defined threshold level of adult career and technical education to complete a program will successfully transition into employment, to further adult education or advanced training and/or military service.
- All students who reach the state-defined threshold level of career and technical education, who leave adult schooling and who are placed in employment will be retained in this activity.
- All adult career and technical education programs preparing students for further training and employment in careers or occupations with significant under representation of males or females will increase participation for under represented males or females.
- All career and technical education programs preparing students for further training and employment in careers or occupations with significant under

representation of males or females will increase program completion for under represented males and females.

The accreditation process for the State's career and technical centers is a voluntary process and is granted only after satisfactorily assuring the PSBVE, through the recommendations of BCTE, that the institution has met the requirements of the Accreditation System of Institutions for Adult Education (ASIAE) process.

Key reasons (as stated in the ASISE Guidelines) why the accreditation of public postsecondary vocational education is important to PA Education are:

- To expand training opportunities for adult students to meet the needs of individuals and the community
- To enhance opportunities for workforce and economic development to help the community reach its overall goals
- To benchmark quality standards for program development, instruction, equipment, processes and services for the purpose of making comparisons and improving the quality of adult education
- To increase enrollment opportunity for schools by being responsive to community needs and helping the school be successful
- To provide accreditation services not readily available to our schools at a cost saving for school systems and the state of Pennsylvania
- To offer a more efficient accreditation process using data and information that is already on file at the Pennsylvania Department of Education (PDE)
- To enhance collaboration between schools and PDE

The following is the role of the Pennsylvania State Board for Vocational Education (PSBVE) and Bureau of Career and Technical Education (BCTE):

1. The Pennsylvania State Board for Vocational Education (PSBVE) and the Bureau of Career and Technical Education (BCTE) have legal authorization and the responsibility for developing, administering and coordinating the evaluation and approval of PPVE programs and institutions in Pennsylvania.
2. They approve programs, facilities and general conduct of the adult education program. The advisory body, Institutional Accreditation Advisory Group (IAAG), provides counsel to the State agency, through BCTE, and makes a meaningful contribution to the Pennsylvania Postsecondary Vocational Education Accreditation process.
3. The BCTE administers the Accreditation System of Institutions for the PPVE. Accreditation status will be granted to an institution that has satisfactorily assured PSBVE, through the recommendations of BCTE, that it has met the published requirements.

Documentation:

Attachment C	ASIAE Guidelines -- Chapter 1 and 2
Attachment D	2007 Status of 2007-2008 Completers
Attachment E	Role of IAAG

- (iii) **Delineates the process by which it differentiates among and approves programs of varying levels.**

The postsecondary Career and Technical programs and institutes authorized by the agency are designed for the purpose of training an individual to effectively pursue employment in an occupational or technical career. The approval process is based on the validation of the programs' objectives of non-degree level programs no longer than 24 months in length.

The approval process requires an institution to submit the documentation that assures that each program is proven effective using the criteria below:

- **Occupationally-Based:** Each program must demonstrate labor market need and that the curriculum is developed through an occupational analysis using labor market data. Analysis can be created (1) locally through industry advisory boards, (2) regionally by developing a curriculum using incumbent workers or (3) using established national industry standards.
- **Performance Based:** Each occupational duty and task must be clearly stated within the program. Performance objectives must be linked to classroom knowledge and skill-based performance for each competency.
- **Assessment:** Each approved adult program must be aligned to a validated set of industry standards, and the assessment must be linked directly to industry validated performance measures and standards. Attainment of an industry-based credential is viewed as a key criteria indicator of successful program delivery.

Career and technical schools seeking PDE Accreditation must fill out a program approval form detailing the following information:

- Describe the current labor data which supports offering this program and how the school will work with local business and industry so that they may benefit from this program.
- Describe how the Local Advisory Committee is involved in this program. Provide examples of recommendations they have made and how this feedback was used to improve the program.
- Describe the local, regional or state need used to develop the program competencies and provide a list of technical tasks/competencies for this program.
- Justify the student to teacher ratio.
- Describe how materials are utilized in the program. i.e., textbooks, handouts, etc.
- Describe the equipment and supplies used in this program.
- Document safety practices utilized in the program and with the equipment.

- Provide a brief description of the end-of-program assessment given. Identify in the last year the number of adults in the program, the number who qualified as completers and the method used to gather information on their career after completion.
- List the professional certificates or licenses which can be achieved by completing this program. Also, list in the last year the number of adults who received these certificates.
- Describe the instructor's credentials for instructing this program.

Programs are then reviewed by the accreditation coordinator and program specialist. Programs must be approved before the career and technical center can be accredited.

Documentation:

Attachment F	ASIAE Guidelines – Chapter 5
Attachment G	Program Approval Form-Greater Johnstown CTC
	Program Approval Form-Indiana CTC
	Program Approval Form-Clearfield CTC

(2) Its organization. The State agency:

- (i) **Employs qualified personnel and uses sound procedures to carry out its operations in a timely and effective manner;**

BCTE is the designated body that has the responsibility for developing, administering and coordinating the evaluation and approval of public postsecondary career and technical education programs and institutions and administering the ASIAE process in Pennsylvania. BCTE Career and Technical Education Advisor serves as the State Accreditation Coordinator (SAC) and is responsible for implementing the agency's accrediting operations. The SAC leads the site-evaluation process, participates in the AISAE site-evaluation final review and, as the key technical support provider, serves as a liaison between the team and the institution's administration.

The SAC is assisted by two professional staff members who provide technical assistance to all programs and institutions, perform program and institutional monitoring, serve as site and/or team chairs, provide training to schools preparing a self-study and to site-visitors, as well as assist the schools in BCTE program delivery. The BCTE staffers are state civil servants and are required to have academic training and professional experience in career and technical education.

The Accreditation procedures are laid out in the Accreditation Guidelines for the Accreditation System of Institutions for Adult Education. Each chapter gives a step-by-step account of how the institutions are to proceed when seeking PPVE Accreditation.

Documentation:

Attachment H	SAC Resume
Attachment I	AISAE Guidelines (See attachment C)

- (ii) Receives adequate and timely financial support, as shown by its appropriations, to carry out its operations;**

BCTE receives its funding allocation from the Pennsylvania Secretary of Education's Legislative Budget. In January of each year, when the regular session of the legislature is held, the PSBVE presents an estimate of the amount of funds necessary to meet the expenditures for the fiscal year. Funding for accreditation activities is reviewed and allocated each year as part of that fiscal budgeting process. Specific funds for the ASIAE activities, such as site-evaluation team travel, overnight expenses, materials and special accreditation activities are included in the budget. BCTE's administration budget for 2009 is \$2,239,793. Of this total, BCTE anticipates that approximately \$150,000 will be absorbed for its ASIAE services and expense. Funding is based on the agency's on-going operating expenses and its projected accreditation expenses.

Documentation:

Attachment J

Pennsylvania Statutes – Title 24, Education, Chapter 1, Public School Code of 1949, Article 18, Vocational Education, (A) School Districts, 18-1811, Estimate of expenses and reimbursements; appropriations.

- (iii) Selects competent and knowledgeable persons, qualified by experience and training, and selects such persons in accordance with nondiscriminatory practices,**

(A) to participate on visiting teams,

The agency has policies and procedures for identifying and selecting its site evaluation team members. The agency's SAC is responsible for coordinating the selections. The agency's site evaluation team pool consists of personnel from BCTE, state certified career and technical instructor, state continuing education coordinators, career and technical institution administrators, persons from colleges and members of the public who are professionals experienced in the career and technical areas within the community.

Each site evaluation team member that is not an employee of BCTE must provide current resumes and evidence of their qualifications, which then are reviewed by the SAC.

Site team members are required to receive training, and additional periodic training on the agency's standards, the agency's Conflict-of-Interest policy, site evaluation procedures, the ASIAE Administration Guidelines and the agency's Self-Study Guidelines.

The agency is also required to comply with the State's non-discrimination policy that prevents discrimination in its employment practices.

Documentation:

Attachment K	ASIAE Administrative Guidelines (See Attachment C, Chapter 18)
Attachment L	Letter asking for site evaluation team members
Attachment M	Potential site evaluation team member resume (Klevis, Messick)
Attachment N	Conflict of Interest Form (Sitroom, Coakley)
Attachment O	Non-discrimination policy
Attachment P	ASIAE Administrative Guidelines (See Attachment C, Chapter 19)
Attachment Q	Training agenda

(B) to engage in consultative services for the evaluation and approval process, and

The Institution Accreditation Advisory Group (IAAG) serves as the agency's advisory board. The agency's policies and procedures for identifying and selecting IAAG members are established and approved by the PSBVE. The IAAG provides consultation and advisement to the agency on the development of standards, operating procedures, policy development and interpretation of educational needs and support projections of the PPVE system. It also provides the agency with current data and information about the job market, employer needs and community opportunities. The group regularly reviews the agency's Self-Study Guidelines and its Accreditation Standards.

Potential IAAG members are identified by the BCTE Director from various sources. The agency's SAC then reviews the qualifications, experience and educational background of each candidate and makes recommendations to the Director, who then selects the IAAG member.

Documentation:

Attachment R	ASIAE Administrative Guidelines – Appendix, Exhibit Q
Attachment S	IAAG Committee
Attachment T	IAAG meeting minutes

(C) to serve on decision-making bodies.

The agency's decision-making body is the Pennsylvania State Board for Vocational Technical Education whose membership is dictated and guided by the Pennsylvania Code. Its twenty-one members are selected by the Governor and confirmed by the Pennsylvania State Senate. Its membership includes senators, representatives, college presidents, local school board members, superintendents of career and technical schools, business leaders, private trade school presidents and a guidance counselor.

Documentation:

Attachment U	Pennsylvania State Board of Vocational Technical Education - Members
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(3) Its procedures. The State agency:

- (i) **Maintains clear definitions of approval status and has developed written procedures for granting, reaffirming, revoking, denying and reinstating approval status:**

The agency's definitions of the approval status and the procedures used to determine the various accrediting categories that an institution may receive are outlined in the ASIAE Administrative Guidelines. The agency's accreditation categories include Accreditation, Probationary Accreditation with Stipulations, Disapproval of Accreditation, Revoking Accreditation and Re-Affirming Accreditation.

The agency's Administration Guidelines outline its established procedures and methods for evaluating and reevaluating public institutions offering postsecondary career and technical education. Agency policy dictates that for accreditation and reaffirming accreditation, it will require a comprehensive evaluation of the institution for compliance with all of its standards. This process includes the submission of a self-study and completion of an on-site evaluation. A point system is used by the evaluators for each section of the self-study during the site review. Any institution that meets all or is only deficient in one category will be recommended for accreditation. An institution that has not more than two deficiencies will be recommended for probationary accreditation with stipulations and have one year to address corrective actions. An institution that has more than two deficiencies is recommended for disapproval of accreditation.

Institutions that meet the State's accreditation standards will be accredited for a period of five years and will be given a letter and certificate of accreditation. Institutions are required to submit an annual report August 31st of every year of accreditation. If the institution has not sustained the expected level of PPVE quality, BCTE works with the institution and provides the necessary technical assistance to help eliminate the need for revoking an accreditation. However, if the institution has not shown any progress in their first five years of accreditation towards bringing their institution up to the standards and quality initiatives, PPVE will revoke the institution's accreditation.

Documentation:

Attachment W	ASIAE Administrative Guidelines (See Attachment C, Chapter 9)
Attachment X	Letter denying Accreditation
Attachment Y	Indiana CTC letter and response to denial
Attachment Z	Minutes from meeting with Indiana regarding denial
Attachment Aa1	Letter granting Accreditation
Attachment Aa2	Re-Affirming Accreditation Letter
Attachment Aa3	CTC withdrawal from accreditation
	E-mail to Federal Financial Aid

- (ii) **Requires, as an integral part of the approval and re-approval process, institutional or program self-analysis and on-site reviews by visiting teams, and provides written and consultative guidance to institutions or programs and visiting teams.**
- (A) **Self-analysis shall be a qualitative assessment of the strengths and limitations of the instructional program, including the achievement of institutional or program objectives, and should involve a representative portion of the institution's administrative staff, teaching faculty, students, governing body and other appropriate constituencies.**

The agency policies require institutions to conduct a comprehensive self-assessment in accordance with the ASIAE Self-Study Guidelines. The agency requires that the self-assessment include a precise written description that identifies the strengths and limitations of the institutions, programs and includes the supporting documentation for the rating that the institution gives itself relative to each of the public postsecondary vocational standards.

Institutions are required to establish a committee (of administrators, instructors, counselors, support personnel and students) to participate in the self-study and to attend the agency's orientation and training on the self-study process.

The agency provides its institutions with instructions that emphasize the importance of the quality of the assessment and makes it clear that the evaluation ratings in the self-study are to be based on the materials and information presented as documentation. BCTE also provides written guidance to applicant institutions on the ASIAE standards and process and provides technical assistance to an applicant institution as specific needs and issues arise. The agency conducts an orientation with the institution's administration, faculty/staff and other key individuals involved in the self-study and the accreditation process. The orientation includes an explanation of the purposes of accreditation, instructions on completing and writing the self-study and the site-visit procedures.

The following areas are included in the self-study:

- Goals and objectives
- Strategic plan and outcomes
- Occupational needs assessments
- Program planning objectives, course outlines and competency lists
- Use of advisory committee input
- Instructor qualifications (degree level, trade experience, professional development, industry certification, etc.)
- Instructional training plans

- Course quality standards, results and grades
- Enrollment levels
- Student-teacher ratios
- Job placement assistance activities
- Placement rates and completion rates
- Safety training and practices
- Facilities, equipment and supplies
- Institution's vision and mission statements
- Student admissions policies
- Job descriptions
- Student follow-up studies
- Course descriptions
- Methods for keeping curriculum current
- Marketing and public relations activities
- Complaint procedures
- Nondiscrimination and educational equity policies
- Other factors that may impact program quality

Documentation:

Attachment Aa5	ASIAE Administration Guidelines (See Attachment C, Appendix L)
Attachment Aa6	Greater Johnstown CTC – Scoring and Self-Study
Attachment Aa7	Lehigh CTC – CTC constituents involved in Self-Study

- (B) The visiting team, which includes qualified examiners other than agency staff, reviews instructional content, methods and resources, administrative management, student services and facilities. It prepares written reports and recommendations for use by the State agency.**

The agency's on-site evaluation teams consist of seven to ten site reviewers and include personnel from the PDE, Continuing Education coordinators, adult vocational teachers, vocational administrators, postsecondary educators and individuals whose expertise, experience and education are related to the type of institution and programs being evaluated.

The agency sends the school's self-study and other documentation to the site team at least 30 days prior to the site review. Each team member reviews their assigned sections of the self-study and submits written comments regarding those sections to the State Accreditation Coordinator (SAC) who merges all of the reviewers' comments into the "Consensus of the Review" document.

The consensus of review document is then sent to all the evaluators and to the school seeking accreditation. The school will review this document, provide responses to the comments and provide this to the evaluation team upon arrival for the site review.

The team verifies the accuracy of the information in the applicant institution's self-study, assesses whether the institution complies with the agency standards and verifies/clarifies how the institution uses the data and information it gathered to make decisions and improve the overall quality of the institution. Areas such as program objectives, course outlines, instructor qualifications, facilities, equipment and supplies and other unique factors that impact program quality are reviewed. During the on-site evaluation, site evaluators interview school administrators, board members, instructors, counselors, students and participate in off-site visits to businesses which employ the CTC's adult students.

During the afternoon of the second day, the team discusses the issues and concerns, prepares a report identifying the strengths, weaknesses and areas needing improvement. Once a preliminary report is compiled, the SAC gives an oral report to the CTC highlighting recommendations and commendations. This is not a question and answer session nor is a decision given to the school at this time whether or not they will receive accreditation.

Documentation:

Attachment Aa8	Evaluator comments
Attachment Aa9	Team Review and Score
Attachment Aa10	Final Report to IAAG

- (iii) **Reevaluates, at reasonable and regularly scheduled intervals, institutions or programs which it has approved.**

The agency reevaluates accredited institutions every five years for reaffirmation of accreditation. The process is identical to the original accreditation process. Programs are reviewed every year for any new submissions, deletions or changes.

The agency also requires each accredited institution to submit an annual report that includes information on its adult vocational education programs to include, but not limited to: student placement data, the deletion or addition of any instructional programs, enrollment and completion data and any substantive changes that may effect its operations or accredited status.

Documentation:

Attachment Bb1	Program approval form
Attachment Bb2	Annual report – See attachment Aa4

(b) Responsibility and reliability. The responsibility and reliability of the State agency will be demonstrated by:

(1) Its responsiveness to the public interest. The State agency:

- (i) Has an advisory body which provides for representation from public employment services and employers, employees, postsecondary vocational educators, students and the general public, including minority groups. Among its functions, this structure provides counsel to the State agency relating to the development of standards, operating procedures and policy and interprets the educational needs and manpower projections of the State's public postsecondary vocational education system;**

PDE utilizes an advisory committee entitled the Institution Accreditation Advisory Group (IAAG). This group is comprised of administrators from career and technical schools, industry, vocational associations, among others. The purpose of the IAAG is to strengthen the Pennsylvania Postsecondary Vocational Educational (PPVE) system. The group provides valuable advice to the State agency, through the BCTE, related to the development of standards; operating procedures and policy and interprets the educational needs and support projections of the PPVE system.

Key goals include:

- Provide information to update, modify, expand and improve the quality of career and technical education programs related to PPVE
- Support and strengthen the relationship between business, industry, the community and education
- Make recommendations to strengthen and expand the curriculum and provide assistance in implementing these recommendations
- Assist in identifying needs, determining priorities and reviewing and evaluating programs and systems related to the PSBVE's Accreditation program.

IAAG members serve on accreditation teams including site-visits, as part of the training process. This allows the members to have hands-on knowledge of how the policies and procedures are implemented by the institutions and evaluated by the team.

Attachment Bb3	ASIAE Administration Guidelines (See Attachment C, Appendix Q)
Attachment Bb4	IAAG members (See Attachment S)
Attachment Bb5	IAAG committee minutes (See Attachment T)
Attachment Bb6	Conflict of Interest Form of IAAG Members on Site Visits

- (ii) **Demonstrates that the advisory body makes a real and meaningful contribution to the approval process;**

The main purpose of the Institutional Accreditation Advisory Group is to strengthen the PPVE system. The group provides valuable advice to the State agency, through the BCTE, related to the development of standards, operating procedures and policy and interprets the educational needs and support projections of the PPVE system. The IAAG reviews and revises the accreditation guidelines to ensure quality and integrity in the PPVE accreditation system. Members take into consideration comments and suggestions from institutions and, if applicable, these are integrated into the guidelines. Members of the IAAG serve on site review teams to get first hand knowledge of the accreditation process. Periodic training is done as new members join the IAAG.

Attachment Bb7 IAAG training
Attachment Bb8 IAAG meeting minutes (See Attachment T)

- (iii) **Provides advance public notice of proposed or revised standards or regulations through its regular channels of communications, supplemented, if necessary, with direct communication to inform interested members of the affected community. In addition, it provides such persons the opportunity to comment on the standards or regulations prior to their adoption;**

BCTE uses a variety of methods for communicating with the public on revisions to PPVE accreditation standards or regulations. The Pennsylvania Department of Education website lists all information regarding PPVE accreditation. This list includes a description of accreditation, PPVE accreditation guidelines, application form, program approval form, annual operational report form and a list of all Career and Technical schools that have PPVE accreditation (who is up for re-accreditation and who are seeking PPVE accreditation). If any changes are being proposed, they are listed on the site with contact information for any comments or questions. BCTE also attends Career and Technical workshops and symposiums and uses such events as a vehicle for disseminating information to the affected community. Another method is PENN*LINK, which is a system BCTE uses to communicate through an e-mail distribution list. Any comments or questions are compiled and reviewed by the IAAG Committee.

Attachment Bb9 Website
Attachment Bb10 Adult Education Workshop Agenda

- (iv) **Secures sufficient qualitative information regarding the applicant institution or program to enable the institution or program to demonstrate that it has an ongoing program of evaluation of outputs consistent with its educational goals.**

PPVE requires all accredited institutions to conduct surveys of their students, faculty and the industry. Student surveys ask questions in regards to the program delivery, content, facilities and equipment and overall satisfaction. Faculty surveys ask questions regarding preparedness, equipment, materials and any suggestions on improvements. The industry surveys ask questions in regards to the level of skill of the student and satisfaction of the employer who has hired the student. These surveys are then compiled by the institution and reviewed against their educational goals for each program and for the institution as a whole. These surveys are produced in the self-study and at the on-site visits where the site team reviews them for content and consistency. Institutions also must show completion rates, credentials earned placement rates, drop out ratios and how this information aligns with its educational goals.

Attachment Cc1 Institution Surveys
Attachment Cc2 ASIAE Administrative Guidelines Self-Study (See attachment C)

- (v) **Encourages experimental and innovative programs to the extent that these are conceived and implemented in a manner which ensures the quality and integrity of the institution or program;**

PPVE encourages all Career and Technical Centers to stay on top of new and emerging training and through their Occupational Advisory Committees, the Career and Technical Centers are able to offer such training to their communities. One Career and Technical Center, working with the Dental Assisting National Board, is able to offer students who enter into their program the chance to take the CDA/GC exam after only one year of work experience instead of the required two. Career and Technical Centers must have all programs approved by PDE through the program approval process to show quality and integrity.

Attachment Cc3 DANB Pathway Study Approval

- (vi) **Demonstrates that it approves only those institutions or programs which meet its published standards; that its standards, policies and procedures are fairly applied; and that its evaluations are conducted and decisions are rendered under conditions that assure an impartial and objective judgment;**

All persons serving on on-site reviews are trained in ASIAE standards, policies and procedures. Reviewers also sign a conflict of interest form showing they will be impartial and objective when reviewing the institution. They review the institution's self-study and are able to write down any comments or questions to the requesting institution before the site-visit. During the site-visit, the reviewers review sections of the self-study and use a scoring system provided by PDE as an evaluation mechanism. Scoring guidelines have been developed to:

- Help calibrate how the Applicant Institution is performing relative to the Standards and Quality Initiatives

- Identify the key areas for improvement focus and to help track improvement over time
- Identify successful role model practices for benchmarking and sharing with other schools in the adult learning system

Any institution scoring a "1" in one or more sections of the evaluation is denied accreditation by PDE. The SAC reviews the final scores of the sections with the reviewers to ensure consensus among the group.

Attachment Cc4 Scoring Guidelines
Attachment Cc5 ASIAE Administrative Guidelines (See Attachment C)

- (vii) **Regularly reviews its standards, policies and procedures in order that the evaluative process shall support constructive analysis, emphasize factors of critical importance and reflect the educational and training needs of the students;**

PDE formally reviews its standards, policies and procedures once per year. They are also reviewed during every site-visit. After every on-site visit to an institution, evaluations are given to the site reviewers and the participating staff at the institution asking for feedback on the visit and the accreditation process as a whole. These evaluations are compiled and reviewed by the IAAG. All comments are taken into consideration and when appropriate, changes are made to the accreditation process.

When reviewing institutions for PPVE accreditation, the IAAG looks to see if the institution is offering courses on the Pennsylvania High Priority Occupation (HPO) list. The Pennsylvania HPO list is a listing produced by Pennsylvania Labor and Industry naming all the occupations in Pennsylvania that are in high demand. By offering courses on this list, the institution is giving the student a better opportunity to enter the Pennsylvania workforce.

Attachment Cc6 Institution Evaluations
Attachment Cc7 Site Reviewers Evaluations
Attachment Cc8 IAAG Minutes reviewing evaluations
Attachment Cc9 IAAG Minutes reviewing petition
Attachment Cc10 IAAG Agenda reviewing guidelines

- (viii) **Performs no function that would be inconsistent with the formation of an independent judgment of the quality of an educational institution or program;**

All institutions follow the same self-study when applying for PPVE accreditation. The SAC works to make sure that the training and review done by the site evaluation team is consistent and follows the ASIAE guidelines. Team members also must sign a conflict of interest form which would exclude anyone who resides or previously worked in the institution's school district, which could in any way potentially prejudice the outcome of the site evaluation or is any way bias towards the institution, staff or its students.

Attachment Dd1 Site Evaluation training session
Attachment Dd2 Conflict of Interest Form (See Attachment N)

- (ix) **Has written procedures for the review of complaints pertaining to institutional or program quality as these relate to the agency's standards, and demonstrates that such procedures are adequate to provide timely treatment of such complaints in a manner fair and equitable to the complainant and to the institution or program.**

Any institution who wishes to file a complaint will follow the procedure as outlined in the Complaint Procedure in the ASIAE Guidelines. Any institution who wishes to file an appeal with the department will follow the Appeals Procedures in the ASIAE Administrative Guidelines which states: If an institute wishes to appeal the Bureau's final decision regarding the accreditation status, institutions may file a written appeal directly with the Secretary of Education in accordance with 1 Pa.Code § 35.20.

Attachment Dd3 ASIAE Administrative Guidelines (See Attachment C, Chapters 11 and 12)

- (x) **Annually makes available to the public (A) its policies for approval, (B) reports of its operations and (C) list of institutions or programs which it has approved;**

The public can find all information regarding PDE Accreditation on the PDE website – www.education.state.pa.us. Such information includes: the ASIAE Administrative Guidelines, Accreditation Application form, Program Approval form, Annual Report form and a list of all PDE Accredited Institutions including those institutions applying for accreditation and those coming up that year for re-accreditation. At any time, interested parties can make comments to PDE by phone, mail or e-mail using the contact information provided at the bottom of the webpage.

Attachment Dd4 Screen shot of PDE webpage

- (xi) **Requires each approved school or program to report on changes instituted to determine continue compliance with standards or regulations;**

PDE accredited institutions must submit an annual report to PDE by August 31st of every year. In this report the institution states any changes to their vision and/or mission statement and reports any changes to:

- Administrative/Staff Personnel
- Educational Programming
- Physical Facilities – per program
- Equipment – per program
- Policies/Procedures – per program

- Instructional Delivery
- Other

The SAC reviews all changes to determine if the institution remains in compliance with PDE Accreditation standards.

Attachment Dd5 Annual Report (See Attachment Aa4)

- (xii) **Confers regularly with counterpart agencies that have similar responsibilities in other and neighboring states about methods and techniques that may be used to meet those responsibilities.**

PDE maintains regular and ongoing contact with its public postsecondary vocational education counterparts in other states to exchange current information about accreditation review, methods, techniques and standards. Through calls and emails, PDE confers with other state agencies when considering major changes to the policies and standards.

Attachment Dd6 Emails to other accreditation agencies

- (2) **It assures that due process is accorded to institutions or programs seeking approval. The State agency:**

- (i) **Provides for adequate discussion during the on-site visit between the visiting team and the faculty, administrative staff, students and other appropriate persons;**

As part of the on-site review, each team is assigned to conduct interviews of specific members of the institution. These interviews include: board members, the administrative director, adult education instructors, adult students, counselors, Career Link staff and interviews with representatives from business and industry who hire the institution's adult education students. Each group is given a list of specific questions to ensure consistency from one institution to the next. These interviews give the site reviewers a chance to further validate evidence provided in the self-study through a consensus of the group.

Attachment Dd7 Accreditation interview forms

Attachment Dd8 Site reviewer's comments on interviews

- (ii) **Furnishes, as a result of the evaluation visit, a written report to the institution or program commenting on areas of strength, areas needing improvement and, when appropriate, suggesting means of improvement and including specific areas, if any, where the institution or program may not be in compliance with the agency's standards;**

After a site-visit, a final report is generated and presented to the IAAG for review and for a vote of accreditation or denial of accreditation. Once the IAAG has made its decision, the report is sent to the institution. In this report, the institution will see the score the reviewers gave to each section of the self-study and Strengths and Opportunities for

Improvement. Strengths are something the institution is doing extremely well and could be used as a best practice for other institutions. Opportunity for Improvement is an area where the institution needs to make changes to its operations or does not meet the standards of the PPVE Accreditation.

Attachment Dd9 Final Report (See Attachment Aa10)

- (iii) **Provides the chief executive officer of the institution 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;**

As per the ASIAE Administrative Guidelines – Report of Findings, if the institution is not granted accreditation by PDE, it will have thirty (30) calendar days to defend/correct the deficiencies stated in the written report. PDE will work with the institution in this endeavor. If there is no response in thirty (30) calendar days, PSBVE's decision is final. If there is a response from the institution, PSBVE will review the response and provide a final decision within thirty (30) calendar days of receiving the response.

Attachment Dd10 ASIAE Administrative Guidelines (See Attachment C)
Attachment Ee1 Indiana Response (See Attachment Y)
Attachment Ee2 PDE response to Indiana (See Attachment Z)

- (iv) **Provides the chief executive officer of the institution with a specific statement of reasons for any adverse action, and notice of the right to appeal such action before an appeal body designated for that purpose;**

In the letter of the final decision to the institution, all reasons are stated as to why the institution is being denied PDE Accreditation. The institution is also notified of the PDE appeal policy and given specific directions as to how to file that appeal. If after the appeal the denial stands, the institution will be able to reapply for accreditation with PDE one (1) year from the denial letter.

Attachment Ee3 ASIAE Administrative Guidelines (See Attachment C)
Attachment Ee4 Denial of Accreditation Letter – Indiana (See Attachment X)

- (v) **Publishes rules of procedure regarding appeals;**

All procedures regarding the appeal process for PPVE accreditation are published in the ASIAE Administrative Guidelines which are given out at Adult Education conferences and workshops. The guidelines are available on the PDE website for public viewing.

Attachment Ee5 ASIAE Administrative Guidelines (See Attachment C)
Attachment Ee6 Snap shot of PDE website

- (vi) Continues the approval status of the institution or program pending disposition of an appeal;**

Approval or approval with stipulations continues until the final decision is made by the appeals committee.

Attachment Ee7 ASIAE Administrative Guidelines (See Attachment C)

- (vii) Furnishes the chief executive officer of the institution or program with a written decision of the appeal body including a statement of its reasons therefore.**

When an appeal is filed by the institution, PDE has 30 days to respond to the appeal. This response is in letter form and will list a statement of reasons as to the granting or denying of PDE Accreditation.

Attachment Ee8 ASIAE Administrative Guidelines (See Attachment C)

- (c) Capacity to foster ethical practices. The State agency must demonstrate its capability and willingness to foster ethical practices by showing that it:**
 - (i) Promotes a well-defined set of ethical standards governing institutional or programmatic practices, including recruitment, advertising, transcripts, fair and equitable student tuition refunds and student placement services;**

As part of the on-site review of the institution, the reviewers evaluate the institutions' answers and evidence provided regarding its adult education practices including their marketing, grading policies, tuition refunds and grievance policies. Reviewers also look to make sure that the institution is following its school code and that the school policies are aligned with the state standards. These are reviewed to ensure consistency and align with the ASIAE Administrative Guidelines.

Attachment Ee9 ASIAE Self-Study Responses from Evaluators

- (ii) Maintains appropriate review in relation to the ethical practices of each approved institution or program.**

All ethical practices of institutions applying for PPVE Accreditation are reviewed on site and again in the annual report. Any concerns with the institution are addressed to the institution by letter with a time line of resolution. Results of concerns could result in placement of the institution on probationary status or revocation of its PDE accreditation.

Attachment Ee10 Annual Report

(Authority: 20 U.S.C. 1094(b)(3))