pennsylvania
DEPARTMENT OF EDUCATION

March 11, 2015

Ms. Karen Molchanow
Executive Director
Pennsylvania State Board for Vocational Education
333 Market Street, 1st Floor
Harrisburg, PA 17126

Dear Ms. Molchanow:

The Pennsylvania Department of Education, Bureau of Career and Technical Education (PDE) is presenting to the Pennsylvania State Board for Vocational Education (State Board) the draft petition that requests the U.S. Department of Education to consider renewing the State Board's recognition as a reliable accrediting authority. The scope of authority is limited to accrediting career and technical centers that offer PDE-approved non-degree granting career and technical education programs for adults that are 300 hours or longer in duration.

The petition provides a response to each of the criteria required of state agencies and as found in the Title 34: Education Part 603.24, Criteria for State agencies.

PDE will ask the State Board to consider approving the petition for submission to the U.S. Department of Education during its May 2015 Board meeting.

The benefits of seeking and retaining the recognition are:

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

If you have any questions regarding the petition or petition process, please contact me at (717) 783-6977 or lburket@pa.gov.

Sincerely,

Lee Burket

Lee Burket, Ed.D.
Director

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

Criteria: 603.24(a)(1)(i) Scope of Operations and Legal Authorization

Response:

Pennsylvania has 61 vocational-technical schools offering public postsecondary vocational education. In 2013-2014, approximately 16,218 adults were enrolled in 406 Career and Technical Centers (CTCs) 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 Pennsylvania Public Postsecondary Vocational Education (PPPVE) and to formulate and adopt curricula, courses of study and other instructional aids necessary for the adequate instruction of PPPVE.

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

Documentation:

Attachment A1 – Pennsylvania Statutes – Title 24, Education, Chapter 1, Public School Code of 1949
Attachment A2 – List of PPPVE Centers

Criteria: 603.24(a)(1)(ii) Scope of Objectives and Activities

Response:

Pennsylvania Career and Technical Centers offer programs in the following National 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 will reach the state-defined threshold level of career and technical education and master the knowledge and skills that meet the program defined academic standards to complete an adult career and technical education program.
•All students will reach a state-defined threshold level of career and technical education to complete an adult program and attain the knowledge and skills that meet program defined and industry validated career and technical skill standards.
•All students will reach a state-defined threshold level of career and technical education and attain a diploma, certificate or other formal awards.
•All students will reach the state-defined threshold level of adult career and technical education to complete a program and successfully transition into employment, to further adult education or advanced training and/or military service.
•All students will reach the state-defined threshold level of career and technical education and upon leaving adult schooling, be placed in employment reflective of the skills learned.
•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 underrepresented 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 underrepresented 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 ASIAE Guidelines) why the accreditation of Pennsylvania Public Postsecondary Vocational Education is important to Pennsylvania 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 Pennsylvania Public Postsecondary Vocational Education (PPPVE) programs and institutions in Pennsylvania.

2. The Pennsylvania State Board for Vocational Education, through the Pennsylvania Department of Education, approves programs, facilities and general conduct of the public postsecondary vocational education programs.

3. The Pennsylvania Department of Education has the responsibility to establish and coordinate an advisory body: Institutional Accreditation Advisory Group (IAAG). The IAAG provides counsel to Pennsylvania Department of Education and makes a meaningful contribution to the Pennsylvania State Board for Vocational Education process.

4. The Pennsylvania Department of Education administers the accreditation program for the Pennsylvania State Board for Vocational Education. Accreditation status will be granted to an institution that has satisfactorily assured the Pennsylvania State Board for Vocational Education, through the recommendation of the Pennsylvania Department of Education, that it has met the published requirements.

Documentation:

Attachment B1 – PPPVE ASIAE Guidelines (See Chapter 1 & 2)
Attachment B2 – Status of 2012-2013 Completers
Attachment B3 – PA Accreditation Policy and Procedure Handbook

Criteria: 603.24(a)(1)(iii) Approval of Varying Program Levels

Response:

The postsecondary Career and Technical Center 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 (at least 300 hours and no longer than 24 months in length).

Career and technical schools seeking PDE Accreditation must be approved through the Career and Technical Education Information System (CATS) detailing the following information:

- Labor Market Needs
- Planning
- Program Content and Industry Standards
- Student/Teacher Ratio
- Utilization of Materials
- Equipment and Supplies
- Safety Practices
- Accountability Standards
- Student and Teacher Industry Certifications

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 C1 – See Attachment B1 (PPPVE ASIAE Guidelines – Chapter 5)
Attachment C2 – Program Approval Form

Criteria: 603.24(a)(2)(i) Staffing and Operational Procedures

Response:

The Bureau of Career and Technical Education (BCTE) is the designated body that has the responsibility for developing, administering and coordinating the evaluation and approval of Pennsylvania public postsecondary career and technical education programs and institutions and administering the ASIAE process in Pennsylvania. BCTE's 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 ASIAE 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 seeking accreditation and to the on-site evaluation team, 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 Handbook for the approval of the Accreditation. Each chapter gives a step-by-step account of the PPPVE operations procedures.

Documentation:

Attachment D1 – SAC Resume, Staff Descriptions
Attachment D2 – See Attachment B3

Criteria: 603.24(a)(2)(ii) Fiscal Capacity

Response:

The Pennsylvania Department of Education receives funding from state allocations and federal grants. The FY2013 budget totals $3,707,750 and includes operational costs for the Bureau of Career and Technical Education. The accreditation activities are included in the Division of Adult and Postsecondary CTE budget. This budget allocation includes salary, travel, and other expenses and benefits for the staff, members assigned to accreditation activities. (See BCTE Position Descriptions in attachment D1) Travel and salary expenditures for all BCTE staff when they assist with accreditation activities, are reflected within their individual division budgets. Administrative functions of the accreditation process are fully funded through permanent sources. No curtailment of the accreditation process has occurred due to fiscal constraints.

Documentation:

Attachment E1 – Pennsylvania Statues – 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.

Attachment E2 - Budget

Criteria: 603.24(a)(2)(iii)(A) Site Team Representatives

Response:

The agency has policies and procedures for identifying and selecting 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 instructors, 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 who is not an employee of BCTE must provide a current resume 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, and complete 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 in its employment practices.

Documentation:

Attachment F1 – See Attachment B1 – Chapter 16 & 17
Attachment F2 – Letter asking for site evaluation team members
Attachment F3 – Potential site evaluation team member resume
Attachment F4 – Conflict of Interest Form
Attachment F5 – Non-Discrimination Policy
Attachment F6 – Training Agenda

Criteria: 603.24(a)(2)(iii)(B) Consultant Representative

Response:

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 PPPVE 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 G1 – See Attachment B1 – Exhibit Q
Attachment G2 – IAAG Committee
Attachment G3 – IAAG Committee Resumes
Attachment G4 – IAAG Meeting Minutes

Criteria: 603.24(a)(2)(iii)(C) Decision Making Representatives

Response:

The agency's decision-making body is the Pennsylvania State Board for Vocational Education (PSBVE) 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.

The State Board provides training to new members on an individual basis.

Documentation:

Attachment H1 – Regulations regarding Pennsylvania State Board for Vocational Education
Attachment H2 – Pennsylvania State Board for Vocational Education - Members
Attachment H3 – Pennsylvania State Board for Vocational Education - Minutes

Criteria: 603.24(a)(3)(i) Approval Status and Written Procedures

Response:

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 Accreditation System of Institutions for Adult Education (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 Administrative Guidelines outline its established procedures and methods for evaluating and re-evaluating public institutions offering postsecondary career and technical education. Agency policy dictates that for accreditation and re-affirming 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 will have one year to address corrective actions. An institution that has more than two deficiencies is recommended for disapproval of accreditation.

Documentation:

Attachment I1 – See Attachment B1 – Chapter 9 & 10
Attachment I2 – Re-Accreditation Letter

Criteria: 603.24(a)(3)(ii) Self-Analysis and On-Site Review Requirements

Response:

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 and evidence to support its responses. The agency provides its institutions with instructions that emphasize the importance of the quality of the assessment and provides technical assistance to an applicant institution as specific needs and issues arise. Site team members review the institution's self-study and provide comments. The comments are then given to the institution prior to the visit to help with the evaluation of documents when on site.

On-site visits are in accordance with the ASIAE Guidelines. Procedures for site visits are reviewed with the institution prior to the site visit. Site team members are given an agenda prior to the visit which is also reviewed on the first day of the site visit.

Documentation:

Attachment J1 – See Attachment B1 – Chapter 6, 7, 16 & 17
Attachment J2 – Site Team Comments Prior to On-Site Visit
Attachment J3 – On-Site Review Agenda

Criteria: 603.24(a)(3)(ii)(A) Self-Analysis Requirement

Response:

Institutions are required to establish a represented committee to help develop the institutions Self-Study and to ensure that all involved parties affected by the accreditation are informed of the processes.

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 K1 – Clearfield County CTC List of Constituents

Criteria: 603.24(a)(3)(ii)(B) On-Site Visit Requirement

Response:

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

The team verifies the accuracy of the information in the applicant institution's self-study to assess whether the institution complies with the agency standards: Organizational Leadership; Student, Stakeholder and Public/Community Focus; Administration, Staff, faculty and Support Service; Learning-Centered Program Design and Delivery; Learning-Centered Facilities and Equipment; Organizational Performance Results and verifies/clarifies how the institution uses the data and information 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, Careerlink, instructors, counselors, students and participate in off-site visits to businesses which employ the CTC's adult students.

At the end of the on-site visit, the team discusses the issues and concerns, prepares a Preliminary Draft Report identifying the strengths, opportunities for improvement and corrective action, and assigns scores to each section.

Documentation:

Attachment L1 – Preliminary Draft Report

Criteria: 603.24(a)(3)(iii) Reevaluation

Response:

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

The agency also requires each accredited institution to submit an annual report. In the annual report, the institution provides a written narrative and documentation to support how it continues to adhere to the six standards as outlined in the ASIAE Guidelines. The SAC reviews the annual reports and looks for any triggers leading to areas of deficiency. If any triggers are found, the institution will be required to provide additional information and/or a corrective action plan.

Documentation:

Attachment M1 – See Attachment B1 – Chapter 12
Attachment M2 – Approved Programs
Attachment M3 – Annual Report Review
Attachment M4 – Annual Report Letter to Institution

Criteria: 603.24(b)(1)(i) Has an Advisory Body

Response:

The Pennsylvania Department of Education (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 (PPPVE) 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 PPPVE system.

Key goals include:

- Provide information to update, modify, expand and improve the quality of career and technical education programs related to PPPVE
- 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 PASBVE'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.

Documentation:

Attachment N1 – See Attachment B1 – Exhibit Q
Attachment N2 – See Attachment G2 – IAAG Committee
Attachment N3 – See Attachment G4 – IAAG Meeting Minutes
Attachment N4 – Conflict of Interest Form – IAAG Member on Site Visit

Criteria: 603.24(b)(1)(ii) Demonstrate meaningful contribution by the advisory body

Response:

The main purpose of the Institutional Accreditation Advisory Group (IAAG) is to strengthen the PPPVE 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 PPPVE system. The IAAG reviews and makes recommendation to the accreditation guidelines to ensure quality and integrity in the PPPVE accreditation system. The IAAG reviews Preliminary Draft Reports and makes recommendations of accreditation status to PDE. Members of the IAAG serve on site review teams to gain knowledge of the accreditation process. Periodic training is done as new members join the IAAG.

Documentation:

Attachment O1 – IAAG Training
Attachment O2 – See Attachment G4 – IAAG Minutes

Criteria: 603.24(b)(1)(iii) Revision of Standards

Response:

The Bureau of Career and Technical Education uses a variety of methods for communicating with the public on revisions to PPPVE accreditation standards or regulations. The Pennsylvania Department of Education website lists all information regarding PPPVE accreditation. This list includes a description of accreditation, PPPVE accreditation guidelines, application form, program approval form, annual operational report form, and a list of all career and technical schools that have PPPVE accreditation to include original accreditation dates, expiration dates, etc. 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.

Documentation:

Attachment P1 – Email to CTCs regarding revisions to Guidelines and comment
Attachment P2 – PACTA Website requesting comment
Attachment P3 – Letter to CTC Extending Accreditation due to Guideline revision

Criteria: 603.24(b)(1)(iv) Program Evaluation

Response:

Pennsylvania Public Postsecondary Vocational Education requires all accredited institutions to conduct surveys of their students, faculty and the industry. Student surveys ask questions in regard to program delivery, content, facilities and equipment, and overall satisfaction. Faculty surveys ask questions in regard to preparedness, equipment, materials and any suggestions on improvements. The industry surveys ask questions in regard 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 used as evidence in the self-study and during 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.

Documentation:

Attachment Q1 – See Attachment B1 – Chapter 5
Attachment Q2 – Self-Study
Attachment Q3 – See Attachment L1 – Preliminary Draft Report
Attachment Q4 – See Attachment M3 – Annual Report Review
Attachment Q5 – Surveys

Criteria: 603.24(b)(1)(v) Experimental and Innovative Programming

Response:

Pennsylvania Public Postsecondary Vocational Education 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.

Central PA Institute of Science and Technology (CPI) started a new Energy Program. The need for this program was determined through contact and discussion with CPI's local employer/ manufacturers, data from local Workforce Investment Boards (WIBs) in Central PA (e.g. Renewable Energy Technicians is a High Priority Occupation within the region), job advertisement postings, Center for Workforce Information and Analysis (CWIA - paworkstats.state.pa.us) data, and national data regarding the need for Solar Photovoltaic and Solar Thermal Technicians and Installers as well as Wind Energy Technicians. The United States and Pennsylvania have invested significant resources in "green" technology and "green" employment. Growth in renewables both residential and commercial are in the double digits. Tax incentives are established to encourage users to convert to renewable energy and solar and wind are a big part of that equation. The Central PA WIBs have listed the occupation as high priority and CPI's Heating, Ventilation, and Air Conditioning and Emerging Energy & Infrastructure Occupational Advisory Committees have indicated that they are hiring trained technicians in solar.

Along with significant vendor input, numerous employer meetings were held by CPI to gather information related to curriculum and equipment. Prior to hiring the instructor, administration attended training sessions on advanced manufacturing at various statewide conferences (e.g. Pennsylvania Association of Career and Technical Administrators, Association of Career and Technical Education). After hiring the instructor/coordinator, teams from CPI visited schools that operate similar renewable energy programs. Curriculum teams met continuously throughout the design phase. Upon completion of the competency area and crosswalk, CPI offered its Solar and Wind Program to the public through its Emerging Energy & Infrastructure Program. The program's lead instructor/coordinator is pursuing North American Board of Certified Energy Practitioners (NABCEP) certification for the Solar and Wind Programs.

Documentation:

Attachment R1 – Energy Program
Attachment R2 – See Attachment Q2 – Self Study
Attachment R3 – See Attachment L1 – Preliminary Draft Report
Attachment R4 – See Attachment M3 – Annual Report Review

Criteria: 603.24(b)(1)(vi) Institutional/Program Approval

Response:

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 submit any comments or questions regarding the self-study to the SAC who will then submit them to the 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

Documentation:

Attachment S1 – See Attachment F6 – Training Agenda
Attachment S2 – See Attachment J2 – Site Team Comments
Attachment S3 – See Attachment B1 – Exhibit L, Chapter 16 & 17
Attachment S4 – See Attachment L1 – Preliminary Draft Report
Attachment S5 – See Attachment F4 – Conflict of Interest Form
Attachment S6 – Site Team Evaluation

Criteria: 603.24(b)(1)(vii) Review of Standards

Response:

The Pennsylvania Department of Education formally reviews its standards, policies and procedures once per year. They are also reviewed during every site visit. After every on-site visit, evaluations are given to the site reviewers and the participating staff at the institution requesting 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.

Changes to the standards, if minor, will be made during the spring and be released to career and technical centers for use during the following program year.

Once every four years, the SAC will distribute the accreditation standards to each of the career and technical centers located in Pennsylvania. Each career and technical center administrator will be asked to review the standards and provide input on not only the standards but the accreditation process and guidelines.

Changes to the standards will be reviewed by the IAAG. During the review of the results, the IAAG will also provide input into the standards and guidelines. The approved changes will be presented to the State Board for Vocational Education for their review and approval.

Documentation:

Attachment T1 – See Attachment B1 – Chapter 18
Attachment T2 – See Attachment S6 – Site Team Evaluations
Attachment T3 – Institution Evaluation
Attachment T4 – IAAG Minutes (Reviewing Guidelines)
Attachment T5 – BCTE Summary of Revised Guidelines to PSBVE
Attachment T6 – PSBVE Minutes Approving Guidelines

Criteria: 603.24(b)(1)(viii) Independent Judgment of Quality

Response:

All institutions follow the same self-study when applying for PPPVE accreditation. The SAC works to make sure that the training and review completed 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 in any way bias towards the institution, staff or its students.

Documentation:

Attachment U1 – See Attachment F6 – Training Agenda
Attachment U2 – See Attachment F4 – Conflict of Interest Form

Criteria: 603.24(b)(1)(ix) Complaint Procedures

Response:

Any institution who wishes to file a complaint regarding the PPPVE Accreditation process, must do so in writing and be directed to the Director of Career and Technical Education at the Pennsylvania Department of Education. Solutions will be executed as appropriate. If necessary, a disposition of the complaint will be provided in writing within 10 calendar days of the final decision.

Neither the PA State Board for Vocational Education nor the Pennsylvania Department of Education has had complaints submitted to them in regard to PPPVE Accreditation. A process is in place to discuss complaints in the ASIAE Guidelines.

Documentation:

Attachment V1 – See Attachment B1 – Chapter 11
Attachment V2 – IAAG Minutes (Complaints)

Criteria: 603.24(b)(1)(x) Publicly Available Information

Response:

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 make comments to PDE by phone, mail or e-mail using the contact information provided at the bottom of the webpage.

When policy changes are made, announcements are sent out to PPPVE centers and posted on PDE's website.

Documentation:

Attachment W1 – PDE Website

Criteria: 603.24(b)(1)(xi) School/Program Changes

Response:

Pennsylvania State Board for Vocational Education accredited institutions must submit an annual report to PDE by August 31 of each year. In the annual report, the institution reports any changes to their vision and/or mission statement and any changes to:

- Administrative/Staff Personnel
- Policies/Procedures – per program
- Instructional Delivery

Any changes to the programs are completed through the Career and Technical Information System (CATS) and approved by the SAC.

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

Documentation:

Attachment X1 – See Attachment M3 – Annual Report Review
Attachment X2 – See Attachment C2 – Program Approval Form

Criteria: 603.24(b)(1)(xii) Interagency Consultation

Response:

The Pennsylvania Department of Education 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.

Documentation:

Attachment Y1 – Email Correspondence with Oklahoma

Criteria: 603.24(b)(2)(i) Due Process – On-Site Visits

Response:

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, 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 site team 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.

Documentation:

Attachment Z1 – See Attachment B1 – Exhibit K & Chapter 9
Attachment Z2 – Evaluator notes from on-site interviews
Attachment Z3 – See Attachment J3 – On-Site Agenda
Attachment Z4 – See Attachment F6 – Training Agenda

Criteria: 603.24(b)(2)(ii) Report on Strengths, Weaknesses, and Compliance

Response:

After a site-visit, a Preliminary Draft Report is generated and sent back to the applicant institution for review. In the report is a written comment and if applicable - commendation, opportunity for improvement or corrective action. The institution will have 30 days from the date of the Preliminary Draft Report Cover letter to respond in writing to any items in the report and may submit supporting documentation. If the institution does respond to the Preliminary Draft Report, the response will be reviewed by the SAC and if necessary, the site team members. The Preliminary Draft Report will be amended to reflect any changes and before being given to the IAAG for their review and recommendation of accreditation status.

Documentation:

Attachment AA1 – Preliminary Draft Report Cover Letter
Attachment AA2 – See Attachment L1 – Preliminary Draft Report

Criteria: 603.24(b)(2)(iii) Response to Report

Response:

As stated in the previous criteria, the career and technology center has an opportunity to respond to the Preliminary Draft Report up to 30 days of the date of the Preliminary Draft Report cover letter. The SAC will then give the Preliminary Draft Report to the IAAG for review and they will make a recommendation of accreditation status to the SAC. The SAC will complete a Final Draft report with recommended accreditation status to the Director, Bureau of Career and Technical Education (BCTE). The Director will then present the Final Draft Report to the Pennsylvania State Board for Vocational Education for their review. The Pennsylvania State Board for Vocational Education will send the Final Draft Report with BCTE's accreditation status recommendation to the institution and provide an opportunity for the institution to appeal the recommendation within 30 days of the Final Draft report.

Documentation:

Attachment BB1 – See Attachment B1 – Chapter 9
Attachment BB2 – BCTE Preliminary Draft Letter to Center
Attachment BB3 – PSBVE Minutes – Presenting Preliminary Draft Report with Recommendation
Attachment BB4 – PSBVE Letter to Center with Recommendation
Attachment BB5 – PSBVE Minutes – Final Vote
Attachment BB6 – PSBVE Letter to Center with Final Decision

Criteria: 603.24(b)(2)(iv) Adverse Action and Right to Appeal Notice

Response:

The Accreditation System of Institutions for Adult Education Guidelines provides institutions with information regarding the right to appeal an adverse decision. When an appeal is filed by the institution within 30 days of receipt of the Final Draft Report, PSBVE will provide written notice to the parties of receiving the appeal, assign a hearing officer so that a hearing may be held to develop a full and accurate record for the Pennsylvania State Board for Vocational Education's consideration. The PSBVE will review the full record, discuss issues raised, and issue a written final decision including a statement of its reasons thereof. If, after the appeal the decision stands, the institution will be permitted to reapply for accreditation with PDE one (1) year from the denial letter.

PSBVE has had no institutions file an appeal to an adverse decision of an accreditation.

Documentation:

Attachment CC1 – See Attachment B1 – Chapter 9
Attachment CC2 – See Attachment BB4 – PSBVE Letter to Center with Recommendation

Criteria: 603.24(b)(2)(v) Published Appeals Procedures

Response:

All procedures regarding the appeal process for PPPVE accreditation are published in the ASIAE Administrative Guidelines which are distributed during adult education conferences and workshops. The guidelines are available on the PDE website for public viewing.

Documentation:

Attachment DD1 – See Attachment B1 – Chapter 9
Attachment DD2 – See Attachment W1 - Website

Criteria: 603.24(b)(2)(vi) Approval Status Pending Appeal

Response:

The Accreditation System of Institutions for Adult Education Guidelines clearly demonstrates the continuation of the approval status of an institution pending an appeal decision.

The Pennsylvania State Board for Vocational Education has had no institutions submit an appeal.

Documentation:

Attachment EE1 – See Attachment B1 – Chapter 9

Criteria: 603.24(b)(2)(vii) Notifications: Appeal Decisions

Response:

The Pennsylvania State Board for Vocational Education, at this time, has had no occasion to apply the appeal process. The Department is prepared to address appeals as stated in the PPPVE Guidelines.

Documentation:

Attachment FF1 – See Attachment B1 – Chapter 9

Criteria: 603.24(c)(1) Reviews Credit Hour Policies which conforms to accepted practice

Response:

The Pennsylvania State Board for Vocational Education has in place a procedure and policies regarding the review of an institution's credit hours policies and procedures.

The PSBVE has credit hour/clock hour conversion that is based on the credit hour definition found in section 602. Because the career and technical centers use clock hours, the SBVE has developed a conversion formula to align to the credit hour definition of 602. The conversion formula is:

10 theory hours = 1 credit hour
20 lab hours = 1 credit hour
30 internship/externship = 1 credit hour

The review of career and technical center policies include:

- Review of the academic calendar, course scheduling and syllabi
- Review of the institution's policy to determine that the instruction approximates the amount of work defined in paragraph (1) based on institutionally established learning outcomes and verifiable achievement
- Review of the institution's policy for the assignment of credit

The review of the policies will ensure that institutions demonstrate that clock hours, based on the credit hour conversion, assigned to courses for Federal programs adhere to the minimum standards of the credit hour definition in 600.2. During the accreditation on site review, the evaluation team:

- Review the academic calendar, course scheduling and syllabus
- Conduct student interviews to determine a student's completion of a specified number of hours of direct instruction and out-of-class work
- Ensure credits represent verifiable student achievement

PSBVE has reviewed existing State agency credit hour policies for both the noncredit and credit bearing courses. These existing regulations will serve as the basis to determine if the institution's assignment of credit hours conforms to commonly accepted practice in higher education.

Documentation:

Attachment GG1 – See Attachment B1 – Chapter 5 & 17
Attachment GG2 – See Attachment Z2 - Evaluator notes from on-site interviews
Attachment GG3 – PDE, Bureau of Higher Education – Credit Hour Policy
Attachment GG4 – PDE, Bureau of Private License Schools – Credit Hour Policy
Attachment GG5 – Sample Breakdown of PA Private License School Program

Criteria: 603.24 (c)(2) Credit Hour Review

Response:

The Pennsylvania State Board for Vocational Education does review all policies related to an institution's credit hours. A sampling of the center's credit hour break down is reviewed in the self-study and during the on-site visit.

Documentation:

Attachment HH1 – See Attachment B1 – Chapter 5
Attachment HH2 – See Attachment GG3 – GG5
Attachment HH3 – Career and Technical Center Credit Hour Breakdown

Criteria: 603.24(c)(3) Actions on Deficiencies

Response:

Career and Technical Centers are required to submit Annual Reports for every year they are accredited. Within the Annual Report, PDE will review the center's credit hours. As per the ASIAE Guidelines, if a center does not define/institute credit hours, it is considered a trigger in the area of a deficiency and would require the center to provide more information or a corrective action plan. If the center does not correct the deficiency, a letter will be sent to the Director of the center stating that the center is in non-compliance.

Documentation:

Attachment II1 – See Attachment B1 – Chapter 12 & Exhibit R
Attachment II2 – Communication with Center regarding Credit Hour Policy

Criteria: 603.24(c)(4) Credit Hour Notifications

Response:

If the center does not correct the deficiency through the corrective action plan, the center will be found noncompliant; the PSBVE will notify the Director of the center and the U.S. Secretary of Education of the noncompliance.

Documentation:

Attachment JJ1 – See Attachment B1 – Exhibit S

Criteria: 603.24(d)(1) Promote set of ethical standards

Response:

As part of the self-study and on site review, the site evaluation team reviews the policies and practices of the career and technical center to ensure the ethical value of its responsibilities to the students and stakeholders.

Documentation:

Attachment KK1 – See Attachment B1 – Exhibit C (Categories B & D)
Attachment KK2 – See Attachment L1 – Preliminary Draft Report

Criteria: 603.24(d)(2) Maintains review in relation to ethical practices

Response:

All ethical practices of institutions applying for PPPVE Accreditation are reviewed on site and again in the annual report. Any triggers of deficiencies in these areas will require the career and technical center to provide more information or a corrective action plan.

Documentation:

Attachment LL1 – See Attachment B1 – Chapter 12 and Exhibit C (Categories B & D)
Attachment LL2 – See Attachment Q2 – Self Study
Attachment LL3 – See Attachment M3 – Annual Report Review