U.S. Department of Education Office of Postsecondary Education E-recognition System

e-Recognition System Administrator's User Guide Analyst/Reviewer User Guide

Contents

1 Access and Login

The e-Recognition system allows Department staff to review reports submitted by the accrediting agencies as assigned. You can review the agency responses and enter your remarks which will display for the agency when they respond. You can also generate a PDF version of the staff report and the agency report. Reviewers will use the system to review the analysts' remarks and set the report as a draft allowing agencies to make edits/corrections and resubmit for the analyst's final review.

1.1   Accessing the System

To access the system, enter the URL https://surveys.ope.ed.gov/erecognition in the address box of the browser. The e-Recognition landing screen will display. Click the Accept and Login button after reading the Privacy Act Notice and Security Warning message. Enter your User ID and Password and click the Log in button to log in to the system. All login attempts are logged. If you have three unsuccessful login attempts, your account will be locked. You will then need to contact the Help Desk to have your account unlocked. A link to the Contact the Help Desk is located on the Login page.
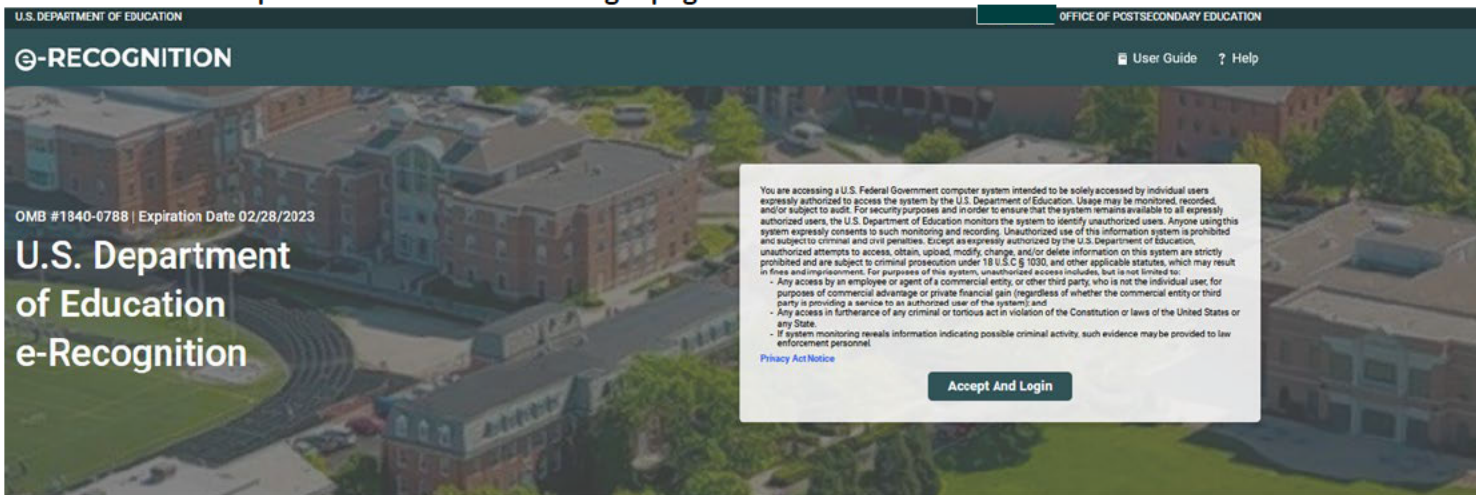
1.2   Forgot Password

If you forget your password, you can click on the 'Forgot Password?' link and enter then your email. The system will confirm your identity and email your password to you. After three failed login attempts, you will be locked out of the system and will need to contact the Help Desk to have your account unlocked.

e-RECOGNITION

User Guide   ? Help

Forgot Password

Please enter your username and email and click the "Send Password" button. Your password will be emailed to you shortly.

If you are unable to provide this information at this time please contact the Help Desk here for further assistance.

Username

Username

Email

Email Address

Cancel   Send Password

1.3   Change Password

You can change your password by clicking on the 'Change Password' link at the top of the screen. You are required to change your password after the first time you log in and every 90 days. This screen will display after you log in if your password has expired.

Enter your Current Password, New Password, and Verify the New Password in the appropriate text boxes, then click the **Submit** button.

e-RECOGNITION

User Guide   ? Help   IA INOVAS Admin Edit User ▾

🔍 Search   📁 e-Folder   💻 Meetings   👤 Users   ✉ Emails   📋 Criteria   📄 Documents   📦 Output Data   📄 Reports   ⚙ System

Change Password

Please create a new password.

Current Password

Password

Password Requirements

- Your new password cannot be the same as your previous 24 passwords.
- Your new password must be at least 12 characters, and include any combination of the following:

    passwords cannot contain your first or last name or the word 'password'

    at least one uppercase alphabetic character (A-Z)

    at least one lowercase alphabetic character (a-z)

    at least one number (0-9)

    at least one special character (#$^+=!*()@%&)

New Password

New Password

Confirm Password

Confirm Password

Back   Submit

1.4   Help

A Help Desk is supported in conjunction with technical support for the e-Recognition website. The role of the Help Desk is to respond to technical questions about the website. Click the '? Help' link to contact the help desk.

1.5   User Guides

Click the 'User Guides' link in the toolbar to view the *User Guides* screen. Click on a link to display any of the guides.

2   Analyst

This section describes the screens used by the analysts to review the agency reports.

2.1   Manage Agencies and Countries

When you log in, the Manage Agencies and Countries screen will display showing the agencies and countries assigned to you and information about the status of their reports. The agencies are in sections by agency type. Click directly on the name of the agency as listed to begin reviewing the report.

e-RECOGNITION

User Guide ? Help TA Testing Accred Edit User ▾

Manage Agencies ▪ e-Folder ▪ Output Data

Manage Agencies

ID	Name	Meeting Date	Type	Status
All ▾	Select ▾	All ▾	All ▾	All ▾

Submission Type	Meeting User		
All ▾	All ▾	Reset	Search

14 Rows

ID	Name	Type	Meeting Date	Status	Submission Type	Narrative Submit Date	Draft Clearance Date	Response Submit Date	Final Clearance Date	Analyst	Meeting User
NACCAS	National Accrediting Commission of Career Arts and Sciences	Accrediting	06/01/2001	Narrative in Process	N/A	----	----	----	----	Testing Accred	----
NACCAS	National Accrediting Commission of Career Arts and Sciences	Accrediting	12/01/2002	N/A	N/A	----	----	----	----	Testing Accred	----
NACCAS	National Accrediting Commission of Career Arts and Sciences	Accrediting	06/01/2004	N/A	N/A	----	----	----	----	Testing Accred	----
NACCAS	National Accrediting Commission of Career Arts and Sciences	Accrediting	06/01/2005	N/A	N/A	----	----	----	----	Testing Accred	----
NACCAS	National Accrediting Commission of Career Arts and Sciences	Accrediting	06/01/2006	Final Review	Other Report	05/08/2006	04/17/2006	----	05/24/2006	Testing Accred	----
	National										

- You can only work with one agency at a time. Click the 'Manage Agencies' link at the top of the page to return to this screen and select a different agency. You cannot have two sessions with two different agencies open at once and should not open the same agency in two different screens. The system will not accept changes made to a report when the same agency is open in two different screens.
- The number of narratives/responses only displays for agencies in a Narrative Submit status. It indicates the number of criteria or questions for which the agency/country has entered a response.

2.2   Introduction

Click the agency/country's name link to review the submission. The Introduction screen will display.

This screen has links to all of the screens needed to complete your review.

e-RECOGNITION   📘 User Guide   ? Help   TA   Testing Accred   Edit User ▾

🔍 Manage Agencies   📁 e-Folder   🗄 Output Data

Manage Agencies > Introduction

Introduction

Meeting Date: 07/15/2009   Name: National Accrediting Commission of Career Arts and Sciences   ID: NACCAS   Type of Submission: Compliance with HEOA   Report Status: Narrative Submit

Introduction   Table of Contents   Review   3rd Party Comments   Analysis Information   Historical Information   Submit

The staff analysis process has been divided into the following items.

Table of Contents

Display the table of contents with list of the responses entered and the files uploaded.

Review

Review narratives, complete the on-line compliance worksheets, and upload any relevant documents to support or detail your findings.

3rd Party Comments

View 3rd party comments and oral comment requests and enter your remarks. (0 oral requests and 0 written comments uploaded.)

Historical Information

View historical information. (0 documents uploaded.)

Analysis Information

Enter information for the staff report.

View Draft Staff Report: View a PDF or HTML version of the staff report.

View Draft Analysis: View a PDF or HTML narratives, responses, and the corresponding analyst worksheet.

Click on the relevant links to begin the staff analysis. Depending on the status and type of the submission, the following links are displayed:

2.3   Table of Contents

Displays each of the criteria/questions for which the agency/country entered a response with a link to the view the narrative. It also lists the files uploaded by the agency/country with a link to view the document.

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Manage Agencies > Table of Contents

Table of Contents

Meeting Date: 07/15/2009   Name: National Accrediting Commission of Career Arts and Sciences   ID: NACCAS   Type of Submission: Compliance with HEOA   Report Status: Narrative Submit

Introduction   **Table of Contents**   Review   3rd Party Comments   Analysis Information   Historical Information   Submit

A table of contents has been generated from the data entered by the agency.

Compliance with HEOA

Page 1 Religious Mission (HEOA section 495(1)(A))
Page 2a Distance Education and Correspondence Education
Page 2b Distance Education and Correspondence Education
Page 2c Distance Education and Correspondence Education
Page 3 Student Achievement Standard (HEOA section 495(1)(B) & (p)(2))
Page 4 Due Process and Appeals (HEOA section 495(1)(C))
Page 5 Accreditation Team Members (HEOA section 495(2)(A))
Page 6a Operating Procedures
Page 6b Operating Procedures
Page 6c Operating Procedures
Page 6d Operating Procedures

List of Exhibits uploaded by Agency   **Download All Agency Exhibits**

Id	Criteria	File Title	File Name	Action	
9184	Page 5	Appendix #3: Workshop Policy	NACCAS_1ts...vb_49.doc	Edit	Archive
9185	Page 1	Goals of Accreditation - 2009 Handbook -	NACCAS_cfu...wa_49.doc	Edit	Archive
9186	Page 2a, Page 2b, Page 2c, Page 4, Page 6a, Page 6b	HEOA Compliance Strategies Time Line Chart	NACCAS_mqz...in_49.DOC	Edit	Archive
9187	Page 6c	May 2009 DOE 30-Day E Notice	NACCAS_pl5...sm_49.doc	Edit	Archive
9188	Page 4	Part 2, Sub Part C - Handbook 2009	NACCAS_b6w...74_49.doc	Edit	Archive
9189	Page 4	Part 5, Sub-Part B of the Rules - Handbook 2009	NACCAS_tf4...5a_49.doc	Edit	Archive
9190	Page 4	Part 9, Sub-Part B of the Rules - Handbook 2009	NACCAS_ikg...y8_49.doc	Edit	Archive
9191	Page 1	Policy I.01	NACCAS_j6z...wh_49.doc	Edit	Archive

2.4   Review

Lists the criteria/questions for accrediting agencies and countries and the status of the analyst's review. From here you will have access to the *Narrative Review* screen to access the agency's

narrative and documentation, complete the review elements, and upload any relevant documents to support your findings.

The screen has two columns for the agency's Narrative submission, the Narrative and Response column.

The status column will contain the following values for agencies:
- Reviewed – This status only displays for the requested scope of recognition after the analyst has completed their review of it.
- Does not Meet – The analyst indicated on the compliance worksheet that the agency did not

meet the requirements for this criterion. The agency will need to enter a response for this criterion after the report is set for resubmissions

- Substantially Compliant – The analyst indicated on the compliance worksheet that the agency was substantially compliant for the requirements of this criterion.
- Meets – The analyst indicated on the compliance worksheet that the agency met the requirements for this criterion.
- N/N – The analyst indicated on the compliance worksheet that the agency did not need to respond to this criterion.
- N/R – The analyst has not begun their review.

The status column will contain the following values for countries and foreign veterinary agencies:
- OK – Comprehensive Response Provided
- Not OK – Additional information is requested
- N/R – The analyst has not begun their review.

- **3rd Party Comments** – View any 3rd party comments and oral comment requests and enter a staff analysis of the third party's written comments. The number of third-party comments is displayed on the *Introduction* screen. This link is not display for countries and foreign veterinary agencies. (See Section 2.7)

- **Historical Information** – View the Department's decision letters and transcripts from prior meetings. The number of historical documents is listed on the *Introduction* screen. (See Section 2.8)

- **Generate Draft/Final Staff Report** – Generate the draft or final staff report in PDF or HTML format. Once you submit and the status has been changed to Response in Process the report in PDF format, it will be saved in the e-folder. Any prior versions of the report will be deleted. (See Section 2.10)

- **Generate Draft/Final Agency/Country Report** –Generate the draft or final agency/country report in PDF, Word, or HTML format. If you generate the report in PDF format, it will be saved in the e-folder. Any prior versions of the report will be deleted. (See Section 2.11)

- **Set for Draft Clearance** – If the agency or country is in Narrative Submit status, this link will display. After you have finished reviewing the agency/country, click this link to notify the reviewers via email that that the draft staff analysis is ready for Draft Clearance.

- **Resubmit Agency –** If the agency or country is in Narrative Submit status, this link will display. After reviewing the agency/country, click this link to resubmit the agency/country petition for additional input.

- **Resend Email –** If the agency or country is in Response in Process status, this link will display. After reviewing the agency/country, click this link to resend the Draft Analysis Notification email to the agency/country.

- **Set for Final Review** – If the agency or country is in Response Submit status, this link will display. After you have finished reviewing the agency/country, click this link to notify the reviewers via email that the final staff analysis is ready for Final Review.

- **Resend Final Email –** If the agency or country is in Final Review status, this link will display. After you have finished reviewing the agency/country, click this link to resend the final review to the agency/country.

- **Meeting Date** – At the bottom of the screen, you can select a different meeting date for the agency from the dropdown menu. The *Introduction* screen will redisplay for the date selected to allow you to view the agency's report.

Click the 'Introduction' link in the top menu to return to the *Introduction* screen from any of the other review screens.

You can perform the following actions on this screen:

- Review the narrative or response.
- If the agency/country uploaded any supporting documents, they will display beneath the narrative. Click the document title to view the document. You may enter your comments about a document in the Analyst Comments text box.
- Indicate if the agency met the requirements for this criterion or not. For countries, indicate if a comprehensive response was provided or if additional information is needed.
- Enter your remarks in the Staff Analysis textbox. Your remarks are limited to 64,000 characters and spaces. A counter below the textbox tracks the number of remaining characters.
- Upload your supporting documents at the bottom of the page. Enter the title and click the **Choose File** button to select the file from your desktop. After you save, the uploaded file is displayed at the bottom of the screen. The document will be added to the e-folder also.
- To delete a document which you uploaded, click the **Delete** button next to it. The document will be deleted from the e-folder also.
- If you click 'Does not Meet' as the status of the criteria, a Staff Determination text box will display. The text you enter here must be added to the staff report by clicking the **Populate from Criteria** button on the 'Analysis Information' link located on the Introduction screen. This text box will also display for foreign veterinary agencies when you click the Additional Information Requested option. Click the **Save** button at the bottom of the Analysis Information screen.

Click the **Save** button to save your entry and perform one of the following actions:
- Save – Redisplay the screen to upload another supporting document.
- Save and Return – Return to the Review screen.
- Save and Display Next Criterion – Display the Compliance Worksheet screen for the next sequential criterion for which the agency entered a narrative or response.

If the agency is not in **Narrative Submit or Response Submit status, the Save** buttons are disabled.

If the report is in Narrative Submit or Response Submit status and you need the agency to enter additional information, contact the Department's Accreditation Group Records Manager to have the agency's report unsubmitted. NOTE: This action will save the draft staff analysis entered and will be viewable by the agency.

The Compliance Worksheet screen has the following additional links in the menu bar at the top which are not displayed on the other screens:

- Back to Review – Returns to the Review screen (see Section 2.4)

The following links will display in a separate window:
- Criteria – Displays the list of criteria page appropriate to the agency type on ED's web site.
- Contact Agency/Country – Pops up a new email window with the To: field pre-populated with the email for the agency/country's point of contact.
- ED Home – Displays ED's Accreditation home page.
- OPE ED Home – Displays the Office of Postsecondary Education home page.
- NACIQI –Displays ED's National Advisory Committee on Institutional Quality and Integrity home page and only displays for domestic agencies.
- NCFMEA –Displays ED's National Committee on Foreign Medical Education and Accreditation home page and only displays for countries.

2.5   3rd Party Comments

When you click the '3rd Party Comments' link on the screen, the *3rd Party Comments* screen will display.

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🔍 Manage Agencies   ▬ e-Folder   ✉ Emails   🗇 Output Data

Manage Agencies > 3rd Party Comments

3rd Party Comments

Meeting Date: 12/01/2006   Name: Accreditation Commission for Education in Nursing   ID: ACEN   Type of Submission: Renewal Petition   Report Status: Final Review

Introduction   Table of Contents   Review   **3rd Party Comments**   Analysis Information   Historical Information

> ⓘ **Warning**   You have read only access to the report.   Hide

3rd Party Written Comments

Document Title	Date	Pro/Con	Oral/Written
Linda Shanta	----	Con	Oral
Analysis of Third-Party Written Comments	----	Pro	Oral

Staff Analysis of 3rd Party Written Comments
Response (Limit 64,000 characters and spaces)

> The Department received one-third party comment regarding NLNAC's petition for renewal of recognition. The commenter outlined the concerns below. All comments are related to one distance education program that is fully accredited by NLNAC.
>
> The commenter alleges inconsistency in the application of NLNAC's curriculum standard (#12-14). The commenter states that the NLNAC accredited distance program relies only on testing to ascertain competence in acquisition of curriculum competencies. The commenter writes that the accredited program does not have a supervised practice in its curriculum plan, nor are practice learning environments selected and monitored by faculty, two required elements of NLNAC's curriculum standard.

2126/64000 characters

Agency Response to 3rd Party Comments

The 3rd Party Comment letter received by DOE expresses concerns related to NLNAC's accreditation of the Associate Degree Nursing Program at Excelsior College. This Program is a non-traditional nursing program established for adult learners who are unable to achieve their educational goals in a traditional program setting. The AD Program of Excelsior was visited in 1999; the program was granted continuing accreditation for 8 years by Commission decision. The program is due to be visited in the 2007 accrediting cycle. As with all programs, ongoing monitoring has been conducted throughout the review cycle. The writer of the letter has inadvertently included nomenclature that NLNAC does not use in labeling the items under 'Documentation Confirms' as "required elements." The items listed under each criterion are not prescribed program standards but are guidelines for elements that programs must discuss in their self-study report during their self-evaluation process as part of accreditation review. Unfortunately, the writer is presenting the argument that every accredited program must follow a traditional nursing model of structured classroom and clinical learning experiences. The Excelsior Program states in its self-study, on the website, and in program materials that the learning is self-paced. Students entering the program are expected to hold certain experience and knowledge related to healthcare. The program does not state in its presentation that students will be enrolled in structured supervised practice settings as in the better-known traditional model with a group of students and instructor. As the writer states, Excelsior demonstrates integrity in its documents by telling the students that self learning in this program will not be the same as a campus-based program. In the self-study materials, Excelsior describes specifically what students are expected to know and how they will be expected to demonstrate knowledge and/or skills. Tables are presented depicting the philosophy/mission as it relates to the program outcomes. The presentation of material is clear in terms of expectations for the students. The visit team verified that the curriculum was developed by the faculty, and all expected documentation was presented as specified under Criterion 13. This Program utilizes competency testing as described by the writer. The Program does not state that the testing is a supervised clinical experience; it is testing for verification of skills. This model is widely used by institutions of higher education to award proficiency credit in a variety of disciplines. The writer goes on to state that the testing contact time does not equal credit time; there is no intention stated by Excelsior College that the testing time will be calculated in the traditional model of contact time used by programs. NLNAC provided the guideline of lecture and clinical time for those programs who conduct class in a more traditional fashion to ensure consistency among programs in terms of contact time for class and clinicals. In Criterion 14, Excelsior discussed the clinical facilities used for performance testing in accordance with the design and delivery of their program. Visitors verified evidence that the agencies used were selected based on the program's criteria and evaluation processes were in place. The presentation offered was clear and concise and found to be in compliance with the standard by the visitors, evaluation review panel members, and the NLNAC Commission. Summary: The writer's comments are related to the areas of documentation that programs must speak to as they complete their self review and self-study report as "required elements" of the program. This is not consistent with NLNAC Standards. This Program was found to be in compliance with the Standards and awarded accreditation based on the self-study report, the visit team's findings, review by the evaluation review panel, and review by the full Commission.

Document(s) Uploaded in response to 3rd Party Comments
There are no documents.

Staff Analysis of Agency Response to 3rd Party Comments
Response (Limit 64,000 characters and spaces)

0/64000 characters

Back   Save

Any 3rd Party written comments and requests to make oral comments for this agency are displayed on this screen. The name of the person making the comment and an indication of whether the comment is pro or con is displayed.

- To view a document, click on the 'File Name' link.

- Enter comments on the 3rd party files or review of the agency's response to the third-party comments, in the text box and click the **Save** button.
- If the agency uploaded any files in response to the comments, they will display at the bottom of the screen.

2.6   Historical Information Documents

Click the 'Historical Information' link on the screen to display Department decision letters or transcripts from prior meetings for this agency/country. To view a document, click on the document name link.

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Manage Agencies > Historical Information

Historical Information

Meeting Date: 12/01/2006   Name: Accreditation Commission for Education in Nursing   ID: ACEN   Type of Submission: Renewal Petition   Report Status: **Final Review**

Introduction   Table of Contents   Review   3rd Party Comments   Analysis Information   **Historical Information**

⚠ **Warning**   You have read only access to the report.   **Hide**

Meeting Date	Document
02/07/2018	ACEN decision letteer 2-18
02/07/2018	ACEN transcript 2-2018
12/16/2015	ACEN F2015 Senior Department Official's (SDO) Decision Letter
12/16/2015	ACEN December 2015 Transcript
06/25/2015	ACEN S2015 Appeals Package
06/18/2014	ACEN June 2014 Transcript
06/18/2014	ACEN SP2014 Senior Department Official's (SDO) Decision Letter
06/25/2012	ACEN June 2012 Transcript
06/25/2012	NLNAC June 2012 Senior Department Official's Decision Ltr
06/01/2008	ACEN SP2008 Senior Department Official's (SDO) Decision Letter
06/01/2008	ACEN SP2008 Transcript
12/01/2006	NLNAC December 2006 Secy. decision letter
12/01/2006	NLNAC December 2006 transcript portion
12/01/2006	December 2006 Secretary's Letter
12/01/2006	December 2006 Transcript Portion
06/01/2003	NLNAC June 2003 transcript portion
06/01/2003	ACEN SP2003 Senior Department Official's (SDO) Decision Letter

Back

2.7   Analysis Information

Click the 'Analysis Information' link on the screen. The screen displays as follows for agencies:

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🔍 Manage Agencies   📖 e-Folder   ✉ Emails   📄 Output Data

Manage Agencies > Analysis Information

Analysis Information

Meeting Date: 10/25/2022   Name: ABCDE FM   ID: ABCDEFM   Type of Submission: Determination   Report Status: Narrative in Process

Introduction   Table of Contents   Review   3rd Party Comments   **Analysis Information**   Historical Information

⚠ **Warning**   **You have read only access to the report.**   Hide

Report Title

Prepared Month and Year:

Background (Limit 7,500 characters and spaces)

0/7500 characters

Recognition History (Limit 7,500 characters and spaces)

0/7500 characters

Back   Save

- Enter the analysis information and click the **Save** button.

2.8   Generate Staff Report

- When you click the 'Generate Draft/Final Staff Report PDF' link on the Introduction or the Analysis Information screen, the Staff Report PDF will display in a separate window. When in Narrative Submit status, the analyst will complete the review section for each criteria. Only when the analyst clicks on the analysis information link, populates the issues and problems and saves the updated information, will the draft staff report will be saved in the e-folder.
- Once in Response Submit, the same process occurs. When the updated information is saved, the staff report will be updated and that version will be uploaded to the e-folder. Any prior versions of the draft/final staff report will be deleted.

- When the agency's report is set for resubmission, the draft version of the PDF is available to them when they log into the e-recognition system.
- When the agency is placed in final review status, the final version of the staff report is available to them when they log into the e-recognition system.

U.S. Department of Education Staff Report to the Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** Accreditation Council for Pharmacy Education

   (1952 / 2012)

   (The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)

2. **Action Item:** Petition for Continued Recognition

3. **Current Scope of Recognition:** The accreditation and preaccreditation, within the United States, of professional degree programs in pharmacy leading to the degree of Doctor of Pharmacy, including those programs offered via distance education.

4. **Requested Scope of Recognition:** Same.

5. **Date of Advisory Committee Meeting:** 05/22/2018

6. **Staff Recommendation:** Continue the agency's current recognition and require the agency to come into compliance within 12 months, and submit a compliance report 30 days after the 12 month period that demonstrates the agency's compliance with the issue identified below.

7. **Issues or Problems:** Additional information is requested for the following questions. These issues are summarized below and discussed in detail under the Staff Analysis section. [undefined] --

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Accreditation Council for Pharmacy Education (ACPE) accredits and preaccredits professional degree programs in pharmacy leading to the Doctor of Pharmacy degree. Currently, the agency accredits approximately 114 programs, and preaccredits 16 programs, throughout the United States, Puerto Rico and the District of Columbia. Those programs are within institutions that are accredited by regional and national accrediting agencies recognized by the Secretary of Education. Since ACPE is not an institutional accreditor, and does not serve as a gatekeeper of Title IV funds, the agency is not required to meet the Secretary's separate and independent requirements.

Recognition History

The agency was on the first list of nationally recognized accrediting agencies published in 1952. Since that time, the Secretary has periodically reviewed the agency and granted continued recognition. Originally known as the American Council on Pharmaceutical Education, the agency was renamed the Accreditation Council on Pharmacy Education (ACPE) in 2003. The last full review of ACPE took place at the June 2012 meeting of the National Advisory Committee on Institutional Quality and Integrity (NACIQI). After that review, the Department extended the agency's previous grant of recognition and required a compliance report on the issues cited in the staff analysis. As part of its evaluation of the agency's current petition for continued recognition, Department staff reviewed the agency's narrative and supporting documentation. Furthermore, no third-party comments were received in connection with the agency's petition. The agency petition for continued recognition by the Secretary is the subject of this analysis and report hello

PART II: SUMMARY OF FINDINGS

602.15 Administrative and fiscal responsibilities

    (4) Educators and practitioners on its evaluation, policy, and decision-making bodies, if the agency accredits programs or single-purpose institutions that prepare students for a specific profession;

The agency provided its board appointment criteria, qualifications, and current board roster, which clearly indicates that there are both educators and practitioners included. The agency provided the policy relating to the appeals panel composition, which clearly requires both educator and practitioner representation. As the agency stated in Section 602.15(a)(2) that it has not convened an appeals panel, it therefore could not provide documentation to verify implementation of its policies and procedures. In regards to site visitors, the agency included its on-site evaluation policy, which requires representation by an educator and practitioner. The agency provided sample on-site evaluation teams as documentation, which include both practitioners and educators. However, the agency did not provide resumes or CV's for its Educator/Practitioner/ Representatives members (see Sec 602.15(a)(2)) to verify their qualifications. ACPE also failed to indicate (Exhibit 27) which board member are serving as educators or practitioners and or public members (which is required for Sec 602.15(a)(5)). The Department is also concerned that the agency indicates that a Board member serves as a site team member without providing any evidence of recusals of the Board member during decision meetings

The agency needs to provide resumes or CV's to verify the qualifications of its educator and practitioner representatives. The agency also needs to clarify the position of its board members on site evaluation teams and what if any procedure is put in place for recusals of those members during commission decision meetings.

Analyst Remarks to Response:
The Board of Directors is ACPE's policy and decision-making body. As described, the Board is composed of 10 members, three each appointed by three pharmacy organizations representing pharmacy educators, practitioners, and regulators and one public member appointed by the American Council on Education. Full qualifications for all board members are provided in EXHIBIT A, Full Board Qualifications. Furthermore, EXHIBIT B, Board Roles, lists the role served by each member of the current board (e.g., educator, practitioner, regulator or public member). Board member roles can also be found on ACPE's website at https://www.acpe-accredit.org/about/acpe-leadership/. The spring 2017 on-site evaluation cycle schedule also lists members of the evaluation team for each comprehensive on-site evaluation with the evaluation team member's role on the team (e.g., educator, practitioner) clearly indicated (EXHIBIT C, Comprehensive On-Site Evaluation Schedule). ACPE will henceforth add each team member's role on the evaluation team to the schedule to ensure each individual's role is clearly stated.   ACPE was established in 1932 and has been continuously recognized by the Secretary of Education since 1952. Throughout its history ACPE has included Board members as members of the on-site evaluation team and finds that this process has served ACPE well. Due to the sensitivity of its activities, ACPE employs a comprehensive process to avoid bias and protect against conflicts of interest. This process is applicable to ACPE Board members, evaluation team members, professional staff, consultants, and other representatives participating in or observing the program accreditation process. In accordance with this process, Conflict of Interest statements are signed annually by Board members and staff, as well as prior to each visit or meeting by evaluation team members, consultants, and other representatives participating in or observing the program accreditation process (EXHIBIT D, Conflict of Interest Template and EXHIBIT D2, Example Conflict of Interest Form). Evaluation teams are carefully created to ensure a balance of perspectives, evaluation by representative members and to protect against conflicts of interest. In addition, individual programs review the proposed site teams for potential conflicts of interest and provide verification regarding the absence of any conflicts of interest among the selected evaluation site team members. (EXHIBIT E, Program Review of Proposed Teams). Given ACPE's process to rigorously prevent Board members with potential conflicts from serving as an evaluation team member, ACPE does not recuse the Board member that served on the evaluation team from discussion or vote on the program's accreditation at the Board meetings. Each meeting of the ACPE Board opens with a briefing from legal counsel on the importance of declaring conflicts of interest and solicitation of recusals from discussion should any new conflict or matter that would prevent any Board member from being non-partial and unbiased in the discussion and vote on any program on the meeting agenda arise (EXHIBIT E2, Conflict of Interest Presentation at Board Meeting). Consequently, any Board or staff member with a potential conflict of interest for a particular program is recused from discussion and deliberation at the Board meeting (EXHIBIT F, Evidence of Recusal at Board meeting). Anyone recused departs the room until the discussion is concluded and the Board vote is taken. As an added precaution in response to the concern raised in the USDE staff analysis, ACPE has modified its Policy and Procedures Manual to include a template of the Conflict of Interest Form as Addendum 8 to support and provide greater clarity to Section 10: Conflicts of Interest Policy (EXHIBIT G, Conflict of Interest Policy).

PART III: THIRD PARTY COMMENTS

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

2.9   Generate Agency/Country Report

When you click the 'Generate Draft/Final Agency/Country Report PDF or Word' link on the Introduction screen, the report document will display in a separate window. If you display the HTML version, it will display in the same window. The draft report contains all of the narratives and analyst

remarks with a list of uploaded documents for each criterion/question. The final report includes the responses and the analyst remarks for the responses. A list of third-party documents is also included for agencies.

3   Reviewer

This section describes the screens used by the reviewers.

3.1   Manage Agencies and Countries

When a user is assigned access as a reviewer, the *Manage Agencies and Countries* screen will display a list of the agencies and countries with a current meeting date for the analysts assigned to the reviewer.

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🗐 User Guide   ? Help   CE   Creviewer E-C   Edit User ⌄

🔍 Manage Agencies   📖 e-Folder   ✉ Emails   🗐 Output Data

Manage Agencies

ID	Name	Meeting Date	Type	Status
All ⌄	Select ⌄	All ⌄	All ⌄	All ⌄

Submission Type	Meeting User		
All ⌄	All ⌄	Reset	Search

177 Rows

ID	Name	Type	Meeting Date	Status	Submission Type	Narrative Submit Date	Draft Clearance Date	Response Submit Date	Final Clearance Date	Analyst	Meeting User
ABCDEFM	ABCDE FM	Foreign Med	10/25/2022	Narrative in Process	Determination	----	----	----	----	Christian Alfaro	----
ABCDEFM	ABCDE FM	Foreign Med	10/25/2022	N/A	Update Report	----	----	----	----	Christian Alfaro	----
ACEN	Accreditation Commission for Education in Nursing	Accrediting	12/01/2001	Narrative in Process	N/A	----	----	----	----	Christian Alfaro	----
ACEN	Accreditation Commission for Education in Nursing	Accrediting	06/01/2003	Narrative in Process	N/A	----	----	----	----	Christian Alfaro	----
ACEN	Accreditation Commission for Education in Nursing	Accrediting	12/01/2006	Final Review	Renewal Petition	11/03/2006	10/12/2006	----	11/20/2006	Christian Alfaro	----

Click the 'Name' link to begin reviewing the agency or country. The *Introduction* screen will display

(see Section 2.2). Seven links display across the top for reviewers on this screen.

3.2   Introduction

Click the agency/country's name link to review the submission. The Introduction screen will display. This screen has links to all of the screens needed to complete your review.

3.3   Table of Contents

Displays each of the criteria/questions for which the agency/country entered a response with a link to the view the narrative. It also lists the files uploaded by the agency/country with a link to view the document.

⊖-RECOGNITION

🖥 User Guide   ? Help   (CE) Creviewer E-C   Edit User ▾

🔍 Search   📁 e-Folder   💻 Meetings   👤 Users   ✉ Emails   📋 Criteria   📗 Documents   📚 Output Data   📋 Reports   ⚙ System

Manage Agencies > Table of Contents

Table of Contents

Meeting Date: **05/22/2018**   Name: **American Bar Association**   ID: **ABA**   Type of Submission: **Compliance Report**   Report Status: **Narrative Analysis Complete**

View As   **Reviewer** ▾

Introduction   **Table of Contents**   Review   3rd Party Comments   Analysis Information   Historical Information   Submit

A table of contents has been generated from the data entered by the agency.

Organizational & Administrative Requirements
602.15(a)(1) Staffing/Financial Resources
602.15(a)(2) Competency of Representatives
602.15(a)(3) Academic/Administrator Representatives

Required Standards & Their Application
602.16(a)(1)(viii) Program Length
602.17(b) Self-Study

List of Exhibits uploaded by Agency

Download All Agency Exhibits

Id	Criteria	File Title	File Name	Action	
36898	602.15(a)(1)	Exhibit 1 Section of Legal Education Staff Listing 2017-18	Exhibit 1-...17-18.pdf	Edit	Archive
36899	602.15(a)(3)	Exhibit 10 Memo Notice and Comment Rules 35 37 38 August 2016	Exhibit 10... 2016.pdf	Edit	Archive
36900	602.15(a)(3)	Exhibit 11 Memo to Council from Staff Rules 35 37 to 38 October 2016	Exhibit 11... 2016.pdf	Edit	Archive
36901	602.15(a)(3), 602.16(a)(1)(viii), 602.17(b)	Exhibit 12 Council Meeting Minutes October 2016	Exhibit 12... 2016.pdf	Edit	Archive
36902	602.15(a)(3)	Exhibit 13 Revised ABA Rules of Procedure 35 37 to 41	Exhibit 13...7to41.pdf	Edit	Archive

3.4   Review

Lists the criteria/questions for accrediting agencies and countries and the status of the review. From here you will have access to the *Narrative Review* screen to access the agency's narrative and documentation, complete the review elements, and upload any relevant documents to support your findings.

3.5   3rd Party Comments

When you click the '3rd Party Comments' link on the screen, the *3rd Party Comments* screen will display.

⊖-RECOGNITION

📖 User Guide   ? Help   **CE**   Creviewer E-C   **Edit User ⌄**

🔍 Search   📁 e-Folder   🗓 Meetings   👤 Users   ✉ Emails   📄 Criteria   📄 Documents   📊 Output Data   📄 Reports   ⚙ System

Manage Agencies > 3rd Party Comments

3rd Party Comments

Meeting Date: 05/22/2018   Name: American Bar Association   ID: ABA   Type of Submission: Compliance Report   Report Status: Narrative Analysis Complete

View As   **Reviewer ⌄**

Introduction   Table of Contents   Review   **3rd Party Comments**   Analysis Information   Historical Information   Submit

3rd Party Written Comments

Document Title	Date		Pro/Con	Oral/Written
TCF-ABA comments	2018-03-05T19:05:53.583		Con	Oral

Staff Analysis of 3rd Party Written Comments
Response (Limit 64,000 characters and spaces)

There was one written comment regarding this agency, which acknowledged the efforts that the agency has made to become compliant with what they described as three personnel issues and two quality control issues; however, the commenter still has concerns.

As it relates to 602.15(a)(1), 602.15(a)(2), and 602.15(a)(3), the commenter pointed out that redactions in the resumes and biographical materials contained in Exhibits 4, 8, and 17 make it difficult for public assessment of staff qualifications. The commenter also had concerns about one specific employee (i.e., Barry Arthur Currier, Managing Director, Legal Education and Accreditation) who held various leadership roles at a non-ABA approved online law school affiliated with Kaplan Legal Education from 2004 to 2010. The commenter emphasized that during such time, a Senate investigation of Kaplan uncovered problematic practices, including Kaplan's provision of online programs. Further, the commenter pointed out that law enforcement actions suggest that Kaplan misrepresented the availability of

3211/64000 characters

Agency Response to 3rd Party Comments
The Council thanks the commenter for acknowledging its efforts to become compliant with the criteria. The Council agrees with the Department's comments that it is allowed to redact information under 34 CFR 602.31(f). In response to the comments on the self-study efforts, please note that the Council has implemented the revisions to Standard 204 for all site visits beginning in the fall of 2017. Moving forward, all schools are required to meet those requirements. In response to the comments on distance education, as the Department staff noted, distance education is not included in the Council's current scope of recognition.

Document(s) Uploaded in response to 3rd Party Comments
There are no documents.

Staff Analysis of Agency Response to 3rd Party Comments
Response (Limit 64,000 characters and spaces)

0/64000 characters

Back   **Save**

Any 3rd Party written comments and requests to make oral comments for this agency are displayed on this screen. The name of the person making the comment and an indication of whether the comment is pro or con is displayed.

- To view a document, click on the 'File Name' link.
- Enter comments on the 3rd party files or review of the agency's response to the third-party comments, in the text box and click the **Save** button.
- If the agency uploaded any files in response to the comments, they will display at the bottom of the screen.

3.6   Historical Information Documents

Click the 'Historical Information' link on the screen to display Department decision letters or transcripts from prior meetings for this agency/country. To view a document, click on the document name link.

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🔍 Search   📁 e-Folder   📅 Meetings   👤 Users   ✉ Emails   📋 Criteria   📄 Documents   ▤ Output Data   📄 Reports   ⚙ System

Manage Agencies > Historical Information

Historical Information

Meeting Date: 05/22/2018   Name: American Bar Association   ID: ABA   Type of Submission: Compliance Report   Report Status: Narrative Analysis Complete

View As   Reviewer ⌄

Introduction   Table of Contents   Review   3rd Party Comments   Analysis Information   **Historical Information**   Submit

Meeting Date	Document
05/22/2018	ABA May 2018
05/22/2018	ABA May 2018
05/22/2018	ABA transcript 5-2018
06/23/2016	ABA S2016 Senior Department Official's (SDO) Decision Letter
06/23/2016	ABA June 2016 Transcript
06/06/2013	ABA June 2013 Senior Department Official's (SDO) Decision Letter
06/06/2013	ABA June 2013 Transcript
06/01/2011	ABA June 2011 Senior Department Official's Decision Ltr
06/01/2011	ABA June 2011 Transcript Portion
12/01/2006	December 2006 Transcript
12/01/2006	December 2006 Sec Decision Ltr
06/01/2002	ABA June 2002 transcript portion

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3.7   Analysis Information

Click the 'Analysis Information' link on the screen. The screen displays as follows for agencies:

Analysis Information

- Enter the analysis information and click the **Save** button.

3.8   Submit Screen

When you click the 'Submit' link on the screen for an agency or country in Narrative Analysis Complete status, the S*ubmit* screen will display. The draft analysis notification email will display at the bottom of the page. The date the email was updated and the user ID of the user who updated it will also display.

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Q Search | 📁 e-Folder | 🖥 Meetings | 👤 Users | ✉ Emails | 🖉 Criteria | 📄 Documents | 🗐 Output Data | 📋 Reports | ⚙ System

Manage Agencies > Submit

Submit

Meeting Date: **05/22/2018**   Name: **American Bar Association**   ID: **ABA**   Type of Submission: **Compliance Report**   Report Status: **Narrative Analysis Complete**

View As | **Reviewer** ⌄

Introduction   Table of Contents   Review   3rd Party Comments   Analysis Information   Historical Information   **Submit**

The resubmit process will unlock the submission and allow the response to be entered.

Once you have reviewed the submission and the analysis, click on the Submit button. The Agency's administrator will be notified by email.

The draft analysis notification email which will be sent to the agency is displayed below.

Subject: Draft NACIQI Notification 3

Dear Christian Alfaro,

The purpose of this e-mail is to inform you that you may gain access to a copy of your agency's Draft Department staff report, third-party comments, and requests to make an oral presentation and your original submission at the E-Recognition Web site: https://surveys.ope.ed.gov/erecognition. Pursuant to the regulations change effective July 1, 2020 the Accreditation Group is beginning to lengthen the reviews of the draft staff analysis and as a result, the deadline for your submission is September 27th, 2021.

You may access a copy of your draft Department staff report and the detailed staff analysis and respond at the Accreditation Division e-Recognition Web site: https://surveys.ope.ed.gov/erecognition You may login with the same ID and Password provided to you during the initial submission process. For your convenience the login information is provided below: Once you have logged in, you may edit your contact information if you so choose at Step 1. The link to the draft staff analysis (Draft Analysis) is located in the blue box on the left side of the screen at Step 2. You will also see a table listing only "met" or "not met" criteria, titled "Analyst's Request for Agency's Response". Step 2. Enter your response and documentation for each finding, as you did for your original submission. Step 3. You can also view your original narrative, documentation, and the detailed staff analysis of your submission. Once you have submitted your response, Department staff will complete a written evaluation of each response. If your agency now meets a particular criterion that we cited, we will change the staff determination for that criterion and update the staff analysis. The revised staff analysis will become the official document. If you have any questions or need more information, please feel free to call me at (202) 453-7615.

Herman Bounds Jr., Ed.S. Director, Accreditation Group

☐ Please confirm this is ready for submission. Please note, the document will be set to Read Only once submit has been pressed.

Back | **Submit**

3.9   Finalize Submission

When you click the 'Finalize Submission' link at the *Introduction* screen for an agency or country in Response Analysis Complete status, the *Finalize Submission* screen will display. The final analysis notification email will display at the bottom of the page. The date the email was updated and the user ID of the user who updated it will also display.

When you click the **Finalize Submission** button, the status is set to Final Review. No further updates will be allowed. The agency's administrator and point of contact will be notified by email.

4   e-Folder

This section describes *e-Folder* screens used by the administrator.

4.1   e-Folder

The e-Folder contains all of the documents added to the system by agencies, countries, analysts, or administrators. You can view the documents from this screen. The *e-Folder* link at the top of the screen will display by default.

- Click the document title to view the document.
- By default, all documents for current meetings are displayed.
- To filter the list of documents displayed, select a value from the Agency Type, Agency, Meeting Date, or Current/Archived dropdowns and click the **search** button.

4.2   Advanced Search

To do an advanced search, click on the 'Advanced Search' link on the screen. When the *e-Folder* screen displays.

To search for documents in the e-folder:
- Enter your search criteria.

- By default, only Current meetings will be searched. To search archived meetings, select archived from the Archived/Current Meetings dropdown.
- If you select an agency from the dropdown, the meeting date dropdown will populate with meeting dates for that agency.
- To search document titles or comments, enter the word or words you wish to search for in the Search For text field. By default, the document or narrative must contain all of the words you enter. If you want to search for any of the words or an exact phrase, select that option from the dropdown.
- Click the **Search** button.
- The *e-Folder Search Results* screen will display with a list of the documents that match your search criteria.
- Your search criteria will be displayed at the top of the screen.