



ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS  
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## MEMORANDUM

To: ABHES-Accredited Institutions and Programs  
Kay Gilcher, U.S. Department of Education

From: Carol Money maker, Executive Director

Date: September 27, 2011

Subject: Call for Comment - Proposed Revisions to *Accreditation Manual* and Bylaws

The Accrediting Bureau of Health Education Schools (ABHES or Commission) regularly reviews its accreditation policies, procedures and standards and by this notice seeks your input on proposed revisions to the *Accreditation Manual* and to ABHES Bylaws.

I. Creation of a subcommittee of the full Commission empowered to act on applications for substantive changes made by member institutions and programs.

U.S. Department of Education recognition criteria require that decisions to approve or deny substantive changes listed in Chapter III.B.2 of the *Accreditation Manual* be made by an authority that is properly constituted to make accreditation decisions. The amendments proposed create a Substantive Change Committee made up of five members of the ABHES Commission and give this committee the power to act on substantive change applications. The proposed amendments assure that the Substantive Change Committee will be properly constituted to make the accreditation decisions assigned to it. Nothing in these amendments limits the power of the Commission as a whole to act on substantive change decisions.

II. Re-designation of qualifications for specific Commission seats and reduction of total Commission seats from fourteen to thirteen.

Following a previous comment period, the Commission acted earlier this year to expand from eleven members to fourteen, in part in response to concerns for managing Commission business given growth in membership in recent years and in part to assure the Commission maintained the diversity of knowledge and experience needed. Subsequently the Commission determined that the addition of three seats is not needed at this time and that two additional seats will address the needs of the Commission. Furthermore, the Commission is recommending the adjustments in the required qualifications shown in the proposed amendments in order to assure that the Commission has knowledge and experience in distance education. The specific seat definitions set forth in the attached, proposed amendments continue to provide for all required representation of background, knowledge and skills.

Comments must be provided on the attached Call for Comment form to [cmoney maker@abhes.org](mailto:cmoney maker@abhes.org), or by mail or facsimile to ABHES (see letterhead), by no later than **Friday, October 28, 2011**. New language is underlined and deleted language is ~~struck~~.

Attachments (Proposed Amendments and Call for Comment form)

## I. SUBSTANTIVE CHANGE COMMITTEE

## Amendments to Accreditation Manual

### CHAPTER III, SECTION B – Institutional Changes

#### 1. Changes Requiring Approval

The following changes must be submitted to ABHES for approval prior to implementation on the appropriate applications ([www.abhes.org](http://www.abhes.org)) for consideration by staff. The Commission may become involved in the consideration if necessary.

(\* denotes a site visit required)

- i. \*Change of location;
- ii. Change of name of controlling institution;
- iii. Addition of new program that does not represent a significant departure from the existing offering of educational programs or method of delivery;
- iv. \*Change from non-main to main campus;

#### 2. Approval of Substantive Change

(\* denotes a site visit required)

An accredited institution or program must notify ABHES of every substantive change as defined by this section using by completing the appropriate substantive change application and must obtain ABHES approval before that change may be included within the institution's grant of accreditation.

No substantive change as defined by this section will be included within an existing grant of accreditation to an institution or program until the effective date of approval of that the specific change by the ABHES Commission. The effective date of approval will not be retroactive, but rather will be the date of the letter from ABHES to the institution or program notifying it that Commission has met and has acted to approve the substantive change. As is set forth below, the only exception to this policy is that ABHES may designate the date of a change in ownership as the effective date of its approval of that substantive change if the Commission action is made within 30 days of the change in ownership.

Approval will not be granted to any substantive change that adversely affects the capacity of the institution to continue to meet accreditation requirements. The ABHES **Executive Substantive Change** Committee acts on applications for substantive change that occur within a grant of accreditation and grants approval for inclusion of the change into an existing grant of accreditation when it determines that the institution or program continues to meet all accreditation requirements.

In order for a substantive change to be considered for approval and inclusion in a grant of accreditation, ABHES requires submission of an application and fee. Visit [www.abhes.org](http://www.abhes.org) and link to “Applications.” Each application identifies the application requirements and fee.

~~Approvals of substantive changes are effective as of the date of the letter from ABHES unless the approval letter specifies a different effective date.~~

**Substantive changes that must be approved prior to inclusion in a grant of accreditation are the following:**

. . . (continue with Subsection 2 list of substantive changes as set forth in present language)

### **Amendments to Bylaws**

*Add the following:*

**Section 6.2.3. Substantive Change Committee.** The Substantive Change Committee may approve substantive changes but otherwise shall not have the authority to grant, deny, rescind, or withdraw accreditation. The Substantive Change Committee shall keep the Commission apprised of its activities on a regular basis.

The Substantive Change Committee shall consist of the Vice Chair, and four other Commissioners appointed by the Chair for one year terms to begin July 1. One of these four must occupy a Public Member seat, one must occupy an Academician or Educator seat, one must occupy a Practitioner seat, and one must occupy an Administrator seat. If the Vice Chair occupies one of these Commission seats, the Chair may fill the remaining seat with any Commissioner so long as the four, separate designations are represented. The Vice Chair of the Commission shall serve as the Chair of the Substantive Change Committee.

Action by the Substantive Change Committee to approve a substantive change is based on review of all required application materials and any other information available to the Committee, including any information in addition to the application required by the Committee in the particular case. Approval of a substantive change requires the agreement of no less than three of the five members of the Committee. Approval may be indicated by affirmative vote taken at an in person or telephonic meeting or by written affirmation delivered by regular or electronic mail.

Nothing in this section regarding the powers of the Substantive Change Committee shall limit the authority or oversight of the Commission, which includes the approval of substantive changes.

## II. COMMISSION COMPOSITION

### Amendments to Bylaws

**Section 4.4. Composition.** The Commission shall be composed of ~~fourteen (14)~~ thirteen (13) individuals. Seven (7) of the individuals shall be nominated and elected by the members in accordance with Section 4.5.3 of these Bylaws (hereinafter referred to as “Elected Commissioners”). ~~Seven (7)~~ Six (6) individuals shall be appointed in accordance with Sections 4.6.2 of these Bylaws (hereinafter referred to as “Appointed Commissioners”). In order to assure that the Commission maintains an appropriate ~~blend~~ balance of qualifications, each commissioner, whether elected or appointed, shall occupy a particular seat on the Commission that has specific eligibility criteria. Only an individual meeting the criteria for a specific seat may be nominated for or appointed to that seat. The specific seats on the Commission and their associated criteria are set forth in Section 4.5.1 for elected seats and in Section 4.6.1 for appointed seats. The number of commissioners may be increased or decreased by amendment to these Bylaws. No decrease in the number of commissioners shall have the effect of shortening the term of any incumbent commissioner.

No more than one sitting commissioner may be employed by or otherwise closely connected to any institution, or group of institutions commonly owned. Such relationship with a sitting commissioner shall disqualify an individual for nomination for an elected or appointed position on the Commission. The Commissioner Nominating Committee shall not nominate two individuals having such relationship for consideration at the same election.

### **Section 4.5. Elected Commissioners.**

#### **Section 4.5.1. Specific Elected Seats and Qualifications.**

- (a) **Elected Seat 1 - Academician in a Healthcare related area.** Requires at least five (5) years of academic experience in a member institution or program, including active participation in an academic capacity in the day-to-day operations of a member institution or program during the three (3) years immediately preceding election (those three (3) years may count toward the five-year experience requirement).
- (b) **Elected Seat 2 - Administrator in a Healthcare related area.** Requires at least five (5) years of administrative experience in a member institution or program, including active participation in an administrative capacity in the day-to-day operations of a member institution or program during the three (3) years immediately preceding election (those three (3) years may count toward the five-year experience requirement).

- (c) **Elected Seats 3 and 4 - Ownership Representative.** Requires current status as: (i) a sole or majority owner of a member institution holding institutional accreditation, (ii) a member of the board of directors, a trustee, or an officer of a member institution or sponsoring institution holding programmatic accreditation owned or operated by a nonprofit entity; (iii) a person who owns a sufficient interest in a member institution or sponsoring institution holding programmatic accreditation that functions as a partnership or privately held corporation and who, therefore, has a direct and abiding interest in its performance and the quality of education it offers; OR (iv) an officer of a publicly held corporation that owns a member institution holding institutional accreditation.
- (c) **Elected Seat 5 —~~Programmatic Representative. Requires at least five (5) years of academic experience in a member institution holding programmatic accreditation.~~ Educator in Specialty Area.** Must be currently and primarily employed in an academic position at a postsecondary institution accredited by an agency recognized by the Secretary of the U.S. Department of Education in a health-care related field for which ABHES is recognized as a programmatic accreditor by the Secretary of the U.S. Department of Education.
- (d) **Elected Seats 6 and 7 - Commissioner-at-large.** Requires at least five (5) years of administrative or academic experience or a combination of administrative and academic experience in a member institution or program, including active participation in day-to-day operations of a member institution or program during the three (3) years immediately preceding election (those three (3) years may count toward the five year experience requirement).

**Section 4.5.2. Eligibility to Vote.** Only institutions and programs accredited by ABHES are eligible to vote for elected commissioners. The number of votes that may be cast is as follows:

- (a) **Accredited Institutions.** Each main campus or non-main campus receives two (2) votes.
- (b) **Accredited Programs.** Each address identified on records as having one or more accredited programs receives one (1) vote.

**Section 4.5.3. Procedures for Election by the Members.** When the term of one or more elected commissioners is set to expire, the Commission will set the time, date, and place for an election. At least thirty (30) days before the date of election, the Executive Director shall provide to all members a notice of election, which shall state: (a) the date, time, place and method of election; (b) the number of commissioners to be elected; (c) the specific seat or seats to be filled and the qualifications required for nomination and election for each seat; and (d) who is eligible to vote.

Upon receipt of the notice of election, members may submit nominations to the Executive Director, for the consideration of the Commissioner Nominating Committee, established in accordance with Section 6.2.2 of these Bylaws. Nominations must be in writing and must state the individual's name, employment, and qualifications for office. The Commissioner Nominating Committee shall determine whether each nominee meets the requirements for the seat to which he or she is nominated. For each seat to be filled, the Commissioner Nominating Committee shall prepare a list of qualified nominees with a brief biographical sketch for each, provided that the nominee has consented in writing to the nomination. An individual may nominate him or herself.

At least ten (10) days before the date of election, the Executive Director shall provide notice of this list to each member. At the same time, the Executive Director will notify any nominee who was deemed by the Commissioner Nominating Committee not to meet the requirements to serve as commissioner. Notice, including provision of the list of nominee may be made in accordance with Article IX of these Bylaws or by posting on the ABHES website and shall be deemed as delivered when posted.

**Section 4.6. Appointed Commissioners.** Following the procedures set forth in Section 4.6.2, The Commission shall appoint seven (7) commissioners, each of whom must meet the specific criteria for the specific seat to which he or she is appointed.

**Section 4.6.1. Specific Appointed Seats and Qualifications.**

- (a) **Appointed Seat 1 ~~and 2~~ - Practitioner in Specialty Area.** Must be currently and primarily employed as a health-care related specialist in a field for which ABHES is recognized as a programmatic accreditor by the Secretary of the U.S. Department of Education.
- (b) **Appointed Seat 2 Baccalaureate Degree Representative.** Must have at least seven (7) years employed by an institution of higher education that awards the baccalaureate degree and is accredited by an agency recognized by the United States Secretary of Education. This employment must be as (i) an instructor of courses that apply toward the baccalaureate degree or higher credential, (ii) an administrator whose responsibilities include one or more academic programs that offer the baccalaureate degree or

higher credential or (iii) a combination of such teaching and administrative work.

- (c) **Appointed Seat 3—Educator in Specialty Area.** ~~Must be currently and primarily employed in an academic position at a postsecondary institution accredited by an agency recognized by the Secretary of the U.S. Department of Education in a health care related field for which ABHES is recognized as a programmatic accreditor by the Secretary of the U.S. Department of Education.~~ **Distance Education Specialist.** Requires at least three (3) years of experience in an academic position designing or developing, teaching and/or evaluating distance education courses at a postsecondary institution accredited by an agency recognized by the Secretary of the U.S. Department of Education.
- (d) **Appointed Seat 4— Commissioner-At-Large.**
- (e) **Appointed Seats 5 and 6 – Public Member.** As provided for in the United State’s Secretary of Education’s Recognition Regulations for Accrediting Agencies, a Public Member is defined by ABHES as an individual who is not (1) An employee, member of the governing board, owner, or shareholder of, or consultant to, an institution or program that is accredited by ABHES or has applied for accreditation, (2) a member of any trade association or membership organization related to, affiliated with, or associated with ABHES, or (3) a spouse, parent, child, or sibling of an individual identified in paragraph (1) or (2) of this definition.
- ~~(e) **Appointed Seat 7— Baccalaureate Degree Representative.** Must have at least seven (7) years employed by an institution of higher education that awards the baccalaureate degree and is accredited by an agency recognized by the United States Secretary of Education. This employment must be as (i) an instructor of courses that apply toward the baccalaureate degree or higher credential, (ii) an administrator whose responsibilities include one or more academic programs that offer the baccalaureate degree or higher credential or (iii) a combination of such teaching and administrative work.~~

**Section 4.9. Removal.** Any Appointed Commissioner may be removed from such office by a majority vote of the Commissioners at a special meeting called expressly for that purpose, at which ~~six (6)~~ seven (7) Commissioners shall constitute a quorum as defined in Section 4.15 of these Bylaws. Any Elected Commissioner may be removed from such office by a majority vote of the members in accordance with Article III of these Bylaws. Any vote to remove an Appointed or Elected Commissioner shall be by secret ballot.

**Section 4.12. Special Meetings.** Special meetings may be called by the Chair; to be held at such time, day, and place, including by teleconference, as shall be designated in the notice of the meeting. A simple majority of the commissioners then in office shall constitute a quorum for the transaction of business at any meeting of the Commission, as described in 4.15, Quorum.

Attachment (Call for Comment Response form)

**CALL FOR COMMENT  
RESPONSE FORM  
September 26, 2011**

**I. SUBSTANTIVE CHANGE COMMITTEE**

**Amendments to Accreditation Manual**

- Agree with Amendments
- Do not agree with Amendments (please provide reason(s)):
- Other Comments:

**Amendments to Bylaws**

- Agree with Amendments
- Do not agree with Amendments (please provide reason(s)):
- Other Comments:

**II. COMMISSION COMPOSITION**

**Amendments to Bylaws**

- Agree with Amendments
- Do not agree with Amendments (please provide reason(s)):
- Other Comments:

.....  
Name and Title:

Institution Name, City, State:

Date:

**Please return by no later than Friday, October 28, 2011,  
to [cmoneymaker@abhes.org](mailto:cmoneymaker@abhes.org),  
or by mail or facsimile to ABHES.**