

Managing COVID-19 Disruption: Accrediting Agencies Adopt Temporary Measures to Address Challenges

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Following the US Department of Education's (ED) release of [guidance to accrediting agencies](#) on March 17, including the flexibility to bypass public comment periods and adoption by full agency membership, accreditors have been developing and adopting new (and notably temporary) policies to address COVID-19 challenges.

This post provides some key pointers to institutions as they consider the impact of these policies on their accreditation processes and statuses.

1. **Check the guidance provided by each relevant accrediting agency.** ED's guidance did not implement blanket flexibility provisions across accreditors, but rather allowed individual accreditors to adopt temporary policies through an abbreviated review process. As a result, it is important to check agency specific policies, including those issued by any programmatic accrediting agency (a collection of agency resources is available [here](#)). The new policies are very much a moving target, as the impact of the pandemic continue to develop, so keep a close watch on inboxes and check in regularly on relevant accreditors' websites for updates.
2. **Agency meeting dates are in flux, and accreditors will have limited discretion to extend terms of accreditation (including good cause extensions) and grant retroactive accreditation.** Accrediting organizations continue to operate (albeit virtually), but there are likely to be some delays in accreditation decisions, particularly for meetings scheduled for this spring and likely into the summer. For institutions or programs scheduled to receive an accreditation action in the coming months, it would be advisable to periodically check the relevant accreditor's meeting dates to ensure that the dates have not changed. The ED guidance permits an accreditor to extend a term of accreditation for a reasonable time and continue good cause extensions beyond the maximum allowable time frame to demonstrate compliance with agency standards. It also reminds accreditors that a grant of retroactive accreditation is allowable under certain circumstances to permit students to graduate from an accredited program even if a site visit is delayed. Adoption and implementation of these flexibilities are up to each individual accreditor.
3. **Virtual site visits might not be an option for all institutions, and even interactive virtual visits will be followed by on-site visits.** Institutions and/or programs should not assume that their accreditors will arrange a virtual site visit if scheduled spring/summer visits have been postponed. Some accreditors will consider the status of the institution or program before determining eligibility for a virtual visit. This topic is likely to be of particular importance for institutions or programs that have been placed on probation, are under a show cause order, or if the accreditor concerns require an on-site visit. ED is interpreting the statutory and regulatory language regarding performance of on-site inspections to require that virtual site visits be followed by in-person visits (even if such visits are not as robust as "full-peer review" visits) at a later date.
4. **Some agencies are requiring institutions to submit notice if it moves instruction online, even if on a temporary basis.** ED's earlier guidance on March 5 allowed accreditors to permit institutions to bypass usual substantive change requirements when moving courses online due to COVID-19 disruptions. Again, accreditors are issuing agency-specific guidance that varies substantially in terms of notification and approval requirements. For example, while some accreditors (such as MSCHE, HLC, ACICS and ACCSC, among others) require formal written notification, others (such as WSCUC) are not currently requiring notice or approval if the change in delivery modality is temporary and solely for the purpose of completing the term. Some accreditors also have clearly defined the "temporary" nature of online instruction. For instance, SACSCOC indicates that the grant of permission for the "temporary emergency relocation of instruction" to distance learning is for a maximum of 120 days. If your institution moved courses online, check with each relevant accreditor to determine if notification (and, in some cases, approval) is required, the nature and scope of the information required, and if the accreditor requires periodic updates or follow-up.
5. **The flexibilities permissible under the ED guidance are temporary.** It is unclear how long the temporary measures will remain in place, but ED reminds agencies that those seeking to extend beyond "the period of COVID-19 interruption" will need to follow the usual requirements for adoption of new policies, including public comment periods and full membership votes. In the meantime, institutions should keep a close eye on relevant agency expectations in the event that the use of distance learning technologies for instructional delivery need to extend beyond the current academic term.
6. **Remember to check guidance from state licensure and certification agencies.** Guidance issued by many

programmatic accreditors, especially those focused on accrediting healthcare programs, has emphasized the importance of contacting relevant state licensure and certification agencies to assess the impact any changes may have on local requirements. While programmatic accreditors can relax or waive certain standards relating to program modality or format, they do not have authority over components of a program that are tied directly to a student's eligibility for state licensure or certification in a particular field (e.g., the number of clinical hours). Rather, it is up to the relevant state agency to determine whether certain requirements to obtain a certain license or certification can be modified in light of the pandemic. While some agencies are beginning to address these important issues by changing their rules or issuing temporary guidance (see this [compilation](#) of guidance issued by state boards of nursing), many others have yet to take this step. Institutions therefore should closely monitor state developments and contact the relevant agencies with any questions.

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