

ON-SITE EVALUATION **GUIDELINES FOR RESPONDING TO LIMITATIONS**

The first opportunity an institution has to show compliance with NACCAS *Standards and Criteria* is its Institutional Self-Study. The on-site evaluation is the second major phase of the accreditation process. At the end of the on-site evaluation, the team will review a report of its findings as they relate to the *Standards and Criteria* with institution representatives. When no limitations are cited under a Standard and Criteria, the report will be marked indicating that the institution is “in compliance.”

In cases where an institution is not in compliance with all elements of a Standard, a “limitation” will be listed in the Visit Report. The limitation will identify the Standard and/or Criterion in question, and will explain why the team found the institution to be out of compliance or only in partial compliance. The exit interview provides an opportunity for institution representatives to ask question and seek clarification. The institution will also be provided the location of this document on the NACCAS website and a copy of these guidelines with the Team Report to assist in preparing a response.

The institution is afforded the opportunity to respond to limitations within forty-five (45) days of receiving the report. The response to a visit report is the institution’s opportunity to show that deficiencies have been corrected or that the institution has always been in compliance. The following are steps suggestions for actions that can be taken as a way of responding to a limitation. The Team Report and your response are reviewed by the Commission. If the Commission does not find the institution in full compliance with all *Standards and Criteria*, it may defer action, or take an action with stipulations, reporting requirements, or other special conditions as described in Part 8 of the NACCAS *Rules of Practice and Procedure*. On occasion the Commission takes an adverse action which the institution may appeal. The institution has another opportunity to respond if any of these actions is taken. In any case, the institution must prove its compliance. So, when preparing the response, be sure to:

1. **Read directions.** Read and follow the directions outlined in the cover letter received with the Team Report or Commission Action Letter. Check for the deadline for responding, and the number of copies that must be submitted of the response, report or appeal. The response must be submitted in a timely manner.
2. **Read limitations.** Read the limitation¹ carefully and understand the violation. Read the Criterion under which the limitation is cited. What is required? If the limitation is not understood, contact the institution’s designated NACCAS Specialist.
3. **Describe compliance.** Describe how the institution is in compliance with the requirement. Clearly describe in written form how the institution has corrected the area of non-compliance. Or, if it is believed the limitation was incorrect, explain why and how the institution is in compliance.
4. **Provide evidence.** Submit evidence to support statements: For either of the two possible approaches to responding (correction or disagreement), submit relevant documentation that clearly supports your narrative explanation. An assurance of compliance which is unsupported by evidence will not show compliance. For example, do not reply by simply saying that the issue is understood and the institution promises to perform differently in the future.
5. **Prepare effective exhibits.** Make sure that the exhibits and documentation:
 - a. Do not consist of blank forms (except in the case of release of information authorizations or forms that, due to special reasons, are to be used at a later date),
 - b. Correlate to the statements in the narrative,
 - c. Support the statements in narrative, and
 - d. Are correct and complete.

¹ The term “limitation” refers as well to stipulations, reasons for deferral, reasons for withdrawal or denial, and reporting requirements.

6. **Prepare the response.** The following are several critical elements of a proper response:
 - a. Address each limitation separately and individually.
 - b. Include three required parts:
 - Re-state exactly the limitation narrative, stipulations, reason for deferral, etc.”
 - A narrative explanation of how the area of non-compliance has been correct or a narrative and rationale for why it is believed that the institution has been in compliance all along;
 - Documentation to support the narrative explanation.
 - c. Prepare the response in accordance with Section 1.6 of NACCAS’ *Rules of Practice and Procedure*. Neatly prepare the response in an organized manner for easy review with:
 - tabs
 - exhibit numbers
 - table of contents, and so forth

Remember, Commissioners will be reviewing the response. They have not actually been at the institution. Therefore, a clear explanation, supported by numerous, relevant documents, will help to paint a clearer picture for the Commission when making accreditation decisions.
 - d. Never respond to a limitation with an “assurance”, (i.e., a statement which promises that the institution is now in compliance, but which is not supported by any documentation to prove that corrective measures have in fact been taken). Always support your statements with documentation.
 - e. When submitting copies of documents, remember the following:
 - i. Make sure the copies are clear and legible;
 - ii. Make sure documents are relevant to the underlying cause of the limitation;
 - iii. Do not submit blank forms; submit copies of actual completed forms (i.e., practical grade sheets, progress reports, contracts, advisement records, etc.);
 - iv. When responding to limitations that list specific names of students, ensure each student listed is addressed.
 - v. Do not insert pages of the response in plastic sleeves (sheet protectors).
 - g. Keep the master copy of the response document at the institution.
7. **Mail the required number of copies** of the complete response document to the NACCAS office via a traceable carrier (UPS, Federal Express, U.S. Post Office – certified mail, etc.).
8. **If there are questions** when preparing a response, call the NACCAS office and speak to the Specialist assigned to your school before submitting the response.

RESPONDING TO COMMON LIMITATIONS²

The following is a guide designed both to assist institutions in correcting the deficiencies most frequently cited during on-site evaluations and to demonstrate compliance with NACCAS' accreditation requirements. This is only a guide. The comments and suggestions do not represent the only way to demonstrate compliance, and do not guarantee that, if followed, will demonstrate the institution's compliance. Please note that this document does not bind the institution or the Commission in any way. There are numerous ways in which to respond that are not described here. Further, there will be situations or circumstances that require that the Commission request more information than is suggested in the following pages. Please remember, the burden of demonstrating compliance rests with the institution and the information submitted in the response must conclusively show that the institution complies with NACCAS' accreditation requirements.

Standard I Educational Objectives and Institutional Evaluation

Criteria 3, 4 & 5. The data contained in the institution's most recent NACCAS Annual Report are accurate. The institution maintains documentation that can be verified and supports the rates of completion, licensure/certification, and employment.

The institution meets or exceeds the following outcomes (D).

- a. Completion rate – 50%
- b. Pass rate on certification or state licensing or certification examination, if required – 70%
- c. Placement rate of eligible graduates – 60%

The institution should provide NACCAS with corrected single cohort grid (or equivalent alternatives) and appropriate backup documentation supporting the information in the cohort grid. (Examples of backup documentation should be provided for a sample of the students listed: every other student, every fourth student on the cohort grid, etc.) Appropriate backup documentation includes (refer to the most recent Annual Report instructions for complete details):

Suggestions:

Grid Graduation Documentation:

- A list of students whose enrollment agreements (or contract addendums) have a calculated scheduled graduation date which falls in the annual report year.
- Identify graduates and their actual graduation dates.
- Identify withdrawn students and their last day of attendance/drop dates.
- Documentation showing the student's original contract end date (i.e., an enrollment agreement)
- Documentation showing any addenda made to the original contract (e.g., leave of absence request, schedule change, etc.)
- Documentation showing the student's graduation information for the program, if applicable (e.g., a copy of an official transcript, a diploma, a report to the state oversight agency of a completer's hours, etc.)

² The term "limitation" refers as well to stipulations, reasons for deferral, reasons for withdrawal or denial, and reporting requirements.

Grid Placement Documentation:

- Of the students scheduled to graduate and actually graduated on the list, in the report year, no matter when they were scheduled to graduate and where they are working (name, address, and telephone number of employer)
- Documentation showing the student's actual graduation date from the program (e.g., a copy of an official transcript, a diploma, a report to the state oversight agency, etc.)
- Documentation showing why a student is declared ineligible for employment based on the Annual Report instructions (e.g., records of military service for someone who is deployed in the military, etc.)
- Documentation showing the employment of each graduate that is listed as employed. Some ways an institution may document employment include (but are not limited to) employer or student surveys, self-certifications from students, printouts from email or social networking websites, etc.

Grid Licensure Documentation:

- Of the students scheduled to graduate and actually graduated on the list, indicate who took the final part of the licensing or certification exam for the first time in the annual report year, along with an indication of whether the student passed or failed the exam.
- Licensure exam reports provided by testing service or state regulatory agency.
- (If no report from state or testing agency) Log of completers (verified via phone, email, Facebook, mail, survey, etc.) who first sat for the exam in the applicable year. Online license verifications may be used as a supplemental resource in order to confirm licensure passes.
- Copies of professional licenses.

- Criterion 7.** The advisory committee shall provide annual feedback in the areas relevant to their experience and/or background. The feedback from the advisory committee must include, but does not have to be limited to, information about the institution's (D)
- a. Curriculum,
 - b. Facilities, supplies, and equipment,
 - c. Completion, licensure or certification, and placement rates, and
 - d. Student support services.
- The institution must maintain the feedback received.

Suggestions:

- Describe how feedback is obtained from the Advisory Board (e.g. meetings, phone surveys, written surveys, etc.)
- Provide a list of members that provided feedback and what position they fill (Employer, instructor etc.)
- Provide a sample questionnaire used to solicit feedback from the Advisory Board members
- Include a copy of the meeting minutes from a meeting or a summary of feedback received by other means
- Submit evidence of the review of the information and the assessment of the institution based on this information (e.g., staff meeting minutes, minutes of a self-assessment session, institutional evaluation record, evidence of action taken as a result of the feedback, etc.).

Criteria 8 & 9. The institution must solicit feedback from current students based on its mission statement and educational objectives. The institution must solicit feedback from graduates based on its mission statement and educational objectives at least annually. (D)

Suggestions:

- Describe how the institution solicits feedback from students and graduates.
- Provide a sample form used to solicit feedback from current students and graduates students, if a form is used.
- Provide a sample of completed surveys from the current students and graduate students.
- Provide a summary of feedback received by way of counseling sessions or general assemblies during which students or graduates provide feedback.

Criterion 10. The institution must maintain a summary of feedback received from the advisory committee members, students and graduates. (D)

Suggestions:

- Describe how the feedback is collected and how often it is collected from the advisory committee, graduate and current students
- Explain how the information and feedback received is used.
- Provide a summary of the feedback collected from the advisory committee, graduate and current students.

Standard II Instructional Staff

Criterion 8. Continuing education completed in person or online, includes a minimum of 4 hours in teaching methodology. This is required for all instructors with the exception of substitutes. (D)

Suggestions:

- List all instructors cited in the limitation with his/her date of hire. For each instructor:
- Provide copies of the continuing education for each instructor listed in the limitation and ensure that the continuing education includes at least 4 hours of teaching methodology.
- Examples of continuing education documentation include, but are not limited to, the following:
 - Transcript or certificate from a college course or program,
 - Distance learning course, or adult education course, that indicates the number of credits or hours obtained,
 - Certificate of attendance from an educational provider that indicates the date and number of hours completed,
 - Letters from manufacturers, who provide product knowledge classes, indicating the subject matter taught, the number of hours of the training, and a list of instructors who attended,
 - Tickets for trade shows, including a copy of the program or flyer that describes the event attended,
 - Course outline, date, name of instructor, instructor's qualifications, and a list of attendees for in-house training,

- Letters from guest speakers indicating the length of the presentation, date, and subject matter presented,
- Sign In Sheets listing the name of the presenter, length of the presentation, date, and title of the continuing education
- Copy of a NACCAS Workshop Attendance Certificate.
- Examples of teaching methodology include topics such as: classroom management, lesson plan development, course development, delivery methods, presentation skills, development and use of teaching aids, student motivation and learning, evaluation and assessment of student progress, qualities of an effective educator, managing the learning environment, basic learning styles and principles, student counseling/advising, career and employment preparation, teaching in the student salon, teaching learning-disabled students, developing effective educational relationships, teaching study and testing skills, teamwork, communications, professional development of the instructor, student retention, etc.

Standard III Administrative Services

Criterion 3. The institution complies with applicable federal, state, and local statutes and regulations governing the operations of the institution including the NACCAS *Rules of Practice and Procedures*. (D/O/A)

Example: Per Section 1.3 of the *Rules of Practice and Procedure*, any program exceeding 150 hours in length or its equivalent in credit competencies and/or leading to initial state license or certification must be approved by the Commission. (D)

Suggestions for if an institution were to be cited for the above example under Section 1.3 of the Rules:

- Submit nine (2) copies of an Application for a New or Change in Program with all required attachments.
- Submit nine (9) copies of a Program Self Study for that program.
- Submit evidence that the program is no longer being offered until the institution has gained approval.

Standard IV Admissions Policies and Procedures

Criterion 4. Before accepting an applicant for admission, the institution provides the applicant access to the institution catalog. (D)

Suggestions:

- Submit an explanation of how you ensure that each student has access to it (internet, printed copy, etc.)
- Submit a list of all students who enrolled since the date of the on-site evaluation with date of enrollment and start date
- Submit signed statements from a sample of the students enrolled since the on-site evaluation certifying that they have been given access to the catalog prior to enrollment.
- Submit copies of checklist showing prospective student provided access to the catalog

Criterion 5. Before enrollment each applicant is provided access to written information that accurately reflects the most recent annual report year statistics. (D)

Suggestions:

- Describe the procedure for providing this information to students including when it is provided and who provides it.
- Submit a list of all students who enrolled since the date of the on-site evaluation with date of enrollment and start date
- Submit copies of checklist showing prospective student provided access to the most recent Annual Report statistics
- Submit signed statements from all students enrolled since the on-site evaluation showing that they received this information prior to enrollment.

Criterion 8. The enrollment agreement must be fully executed prior to the enrollee starting classes. (D)

Suggestions:

- Describe the institution's procedures for enrollment and completing the enrollment agreement;
- Correct any cases cited by the team and submit evidence showing the correction;
- Submit an alphabetical roster of all students enrolled since the on-site evaluation and submit copies of the completed enrollment agreements for a sample of the students on the list (e.g., every other student on the list, every third student on the list, depending on the number of students listed);
- Submit fully-executed enrollment agreements for all students enrolled since the on-site evaluation;
- If there have been no new enrollments since the on-site evaluation, submit an example of a fully-executed enrollment agreement.

Criterion 15. The institution's practices are consistent with its admissions policies and requirements. (D)

Suggestions:

- Submit a detailed description of the institution's admission procedure.
- Provide a copy of the institution's published admission criteria.
- Explain how the institution will ensure going forward that its admissions policy is being followed and correctly implemented.
- Submit documentation to show that cases cited by the team have been corrected.
- Show that the institution's practices are consistent with the policies by submitting an alphabetical roster of the students enrolled since the on-site evaluation and submitting evidence that all students or a relevant sample (every other student, every third, etc.) of these students have met the admission requirements.

Standard V Student Support Services

Criterion 1. The institution provides access to orientation programs, whether verbal, printed, web-based, or other media format on or before the first day of class. (A)

Suggestions:

- Submit a description of the institution's orientation program. State when orientation occurs, who conducts it and list the information covered.
- To show its implementation, submit a lesson plan or agenda for the session and signed statements from all students newly enrolled since the on-site evaluation that they participated in the orientation on or before the first day of class.

Criterion 8. The institution implements the Internal Grievance Procedure Policy, as applicable. (A)

Suggestions:

- Describe the institution's grievance procedure; explain where it is published and how students are made aware of the procedure.
- Submit recent examples of complaints filed with the institution, if applicable. The documentation should show that the institution's procedure was followed and also must show how the complaints were resolved.

Standard VII Financial Practices and Management

Criterion 1. Note: Every institution is required to submit financial statement to the Commission each year within six months following the end of the fiscal year. Statements are analyzed by a CPA, not a visit team, so there will be no limitation under Standard VII Criterion 1 on a visit team report. However, the Commission will consider the analysis of the financial statement when taking action on your institution.

Criterion 6. The institution applies the applicable refund policy to all terminations for any reason, by either party, including student decision, course and/or program cancellation, or institution closure.

and

Criterion 7. The institution maintains evidence that institutional refunds are received by the recipient in a timely manner, such as, but not limited to, cancelled check, bank reconciliation, signed receipt of delivery, or documentation that funds were disposed of in accordance with applicable federal or state regulations.

and

Criterion 8. The institution accurately implements the applicable refund policy. (D)

Suggestions:

- Submit a copy of the institution's refund policy.
- Identify the staff responsible for calculating and providing refunds.
- Correct any cases cited by the team and submit evidence showing the correction;
- Submit an alphabetical roster of all students terminated since the on-site evaluation and submit copies of the enrollment agreement, attendance records, account records or ledger cards, receipts, refund calculations, and evidence of refunds paid timely (if applicable) for a sample of the students on the list (every other student, every third student, etc.).

Standard IX Evaluation of Students

Criterion 2. Practical learning is evaluated using written criteria, such as rubrics or similar means. (D)

Suggestions:

- Submit an example of the institution's grading criteria. More examples are available in the NACCAS Samples and Guidelines Booklet. Two examples of criteria for practical operations are listed below:

Performance of Sterilization and Sanitation Methods

Completely Cleaned combs and brushes free of hair
Washed implements completely in soap solution and rinsed
Placed Combs and brushes in wet sanitizer for correct time
Stored implements in cabinet sanitizer/ultra violet sanitizer
Performed correct sanitation of sink and work area
Performed correct sanitation of fine cutting implements
Performed proper draping of client, cape not touching skin

Drying and Thermal Waving

Dried hair thoroughly
Tested temperature of iron
Subsections curled not wider than barrel
Smoothly rotated iron to catch ends
Used quick snapping movement to release hair
Competent use of iron and comb
Comb used at scalp to protect client while curling
Curl not disturbed when released
Curled complete head according to style
Hair not fish-hooked
Did not burn client or self

- Submit the written performance criteria used to grade student practical work
- Submit an alphabetical roster of all students enrolled, and a sample of practical evaluations based on the written criteria or a sampling of these students (e.g., every other student on the list, every third student on the list, etc.).

Criterion 4. The institution documents that each student who graduates or is otherwise awarded a certificate of completion has fully met the institution's published graduation requirements. (D)

Suggestions:

- Provide a copy of the graduation or completion requirements.
- Explain how the institution determines whether or not a student is eligible to graduate.
- Correct any cases cited by the team and submit evidence showing the correction
- Submit an alphabetical roster of all students who have completed the program since the on-site evaluation, along with evidence showing that each of the requirements had been met by the student prior to her/his being considered a graduate or completer.

Criterion 6. The institution accurately evaluates student progress according to the requirements of the NACCAS *Satisfactory Academic Progress Policy and Checklist*, for *Programs Measured in Clock Hours or Competencies* or for *Programs Measured in Credit Hours*, if applicable. (D)

Suggestions:

- Submit a copy of the institution's Satisfactory Academic Progress policy.
- Submit Corrected cases cited by the team showing how each student should have been evaluated.
- Submit an alphabetical roster of all students currently enrolled, along with each student's start date and current amount of hours, and submit copies of the Satisfactory Academic Progress evaluations scheduled and conducted since the on-site evaluation for a sample of the students on the list (every other student, every third student, etc.).