

# **Guidance for Understanding Standards and Policies**

## **Standard I**

### **Criterion 1**

#### **Guidance**

- The scope is intended to be broad and to allow other than those working within the specific discipline for which they were training to be considered employed. See sample document in Samples and Guides booklet.

### **Criteria 6 & 7**

#### **Guidance**

- The advisory committee can be comprised of one employer and the school owner. One employer could be able to comment on all fields and whether the school's curriculum is effectively preparing graduates for employment. If the school has one advisory committee member who is not qualified to provide feedback in all areas, then the school must have another member. If the institution offers an instructor training program, it is not the intention of the commission for a NACCAS-accredited institution to have an instructor from a competing institution on the advisory committee. Other acceptable members could include: the institution's owner, an instructor for the instructor training program, a graduate of the instructor training program, a substitute instructor, an individual with expertise and teaching experience in post-secondary education, or an individual with knowledge in pedagogy and in the development of curriculum.
- It is the intention of the Commission that the term "annual" be interpreted to mean "every 12 months".

### **Criteria 7, 8 and 9**

#### **Guidance**

- Feedback is defined as the transmission of evaluative or corrective information about the institution's performance as provided by currently enrolled students, graduates of the institution, and the institution's advisory committee.
- Feedback may be collected in a number of formats including, but not limited to:
  - Individual paper surveys
  - Electronic surveys
  - Personal meetings with individual students
  - School assembly wherein feedback is obtained from students
- The institution must document that feedback is obtained at least annually. Such documentation could be provided through dated surveys, a summary of an electronic survey listing the date range of the survey, a dated agenda and report of a general assembly, etc.
- It is the intention of the Commission that the term "annually" be interpreted to mean anytime during the calendar year.

### **Criterion 10**

#### **Guidance**

- In order to comply with this criterion, the feedback must be summarized. Advisory committee meeting minutes, if one has been conducted, satisfy the requirement for a summary of feedback from the advisory committee members. If a school has obtained 50 student and 50 graduate student surveys as feedback, the school must summarize the results of those surveys. However, teams would not necessarily need to see written surveys for feedback. Feedback can be obtained through town meetings, conference calls, or surveys, etc. The school will only need to provide a summary of the feedback and how it was obtained.

**Criterion 11**

**Guidance**

- It is the Commission's objective that the school will no longer have to prepare a written plan; however, the school will need to document those changes which the school deems necessary to make or improve.
  - Example: The school has shampoo bowls that are falling off the wall. Is it documented that repairs have been made.

**Standard II**

**Criteria 1, 3 and 4**

**Guidance**

- It is the Commission's objective that "instructors" under Standard II constitute all regularly employed instructors. Substitute instructors will also need to have appropriate credentials.

**Criterion 2**

**Guidance**

- In the absence of state regulation, teachers must be actively involved in the students' education. The instructor must be located in the area of education they have been assigned to teach/supervise. For a theory class one (1) instructor may be sufficient for a larger student population as appropriate to the subject matter.

**Criterion 6**

**Guidance**

- It is the Commission's objective that Criterion 5 requires documentation that the meeting is being held, and Criterion 6 assures that topics discussed are relevant to the mission and educational objectives.

**Criterion 7**

**Guidance**

- Documentation showing compliance for continuing education is defined as: Participation in a program of instruction which is organized under responsible sponsorship, capable direction, and qualified instruction designed to improve professional proficiency. Twelve clock hours of continuing education or in-service training are required for all instructors in a NACCAS-accredited institution each year. 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 program, or adult education course or program that indicates the number of credits or hours obtained;
  - Certificate of attendance from an educational provider indicating the date, name of attendee, and number of hours or credits completed;
  - Letters from manufacturers, who provide product knowledge classes, indicating the subject matter taught, the number of credits/hours of the training, and a list of instructors attending, name of attendee, date of attendance, and credit/hours of training received;
  - Evidence of attendance at a trade show including a copy of the program or flyer that describes the event attended
  - Course outline that includes date, name of instructor, instructor's qualifications, and a list of attendees for in-house training seminars
  - Copy of a NACCAS workshop attendance certificate (which represents a minimum of 12 hours of continuing education).

**Criterion 8**

**Guidance**

- A teacher who teaches a methodology class may not receive CE credit for presenting the CE class. One owner of a school may teach a CE class to another owner of the school who would receive credit for the CE.
- 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.

**Criterion 9**

**Guidance**

- It is the Commissions intent that a 12 month period be defined as a calendar year or rolling 12 month basis as defined by the institution and that it be specific to the month and not the actual date. For example: an evaluation that was performed on 12/1/2013 could next be performed on the following year by 12/30/2014.

**Criteria 9 & 10**

**Guidance**

- The Commission does not expect that performance evaluations are performed for substitute instructors.

**Criterion 10**

**Guidance**

- The Commission's intent is that acknowledging receipt can be demonstrated by:
  - Having each instructor sign the performance evaluation for
  - Having school staff add a note on the performance evaluation form stating the instructor refused to sign
  - Having the school utilize the statement provided in the sample form found in this section: "By signing below, I acknowledge that this evaluation has been discussed with me. I also understand that my signature does not necessarily indicate agreement".

## Standard III

### Criterion 3

#### Guidance

- It is the Commission's objective that this criterion is used to monitor compliance with a number of other agency requirements or laws such as oversight from the U. S. Department of Education, State Boards of Cosmetology, OSHA, ADA, copyright laws, etc. The commission provides no specific guidance or criteria of compliance for these areas, but wants teams to know that if they see the blatant abuse of any rule, law, or regulation, they should report what they see using this criterion as a reference.

### Criterion 6

#### Guidance

- It is the Commission's objective that the school can have multiple participation agreements including the Program Participation Agreement. On-site evaluation teams should look for documentation and communication between governing bodies and the school in verifying awareness that a change is being made (This is in cases where the school does not yet have an updated PPA or ECAR).

### Criterion 11

The following criterion has been clarified effective May 21, 2013 to read:

- The institution requires written consent from the student or guardian, (**each time**) before releasing any student information in response to a third party request, other than a request by NACCAS, unless otherwise required by law.
  - Please note the added clarifying language in bold indicating that a consent form must be completed for each request.

### Criterion 10

#### Guidance

- A dependent minor is someone who is dependent on a parent or guardian for tax purposes.

### Criterion 14

#### Guidance

- It is the Commission's objective that if the school can provide documentation that is printable, such as a login or password, then the school could show compliance with this criterion.
- The enrollment data is to be reported by program; however, it is based on increase in the overall growth (Based on Annual Report).

### Advertising Policy

#### Guidance

- Institutions may use a corporate name that is totally different from the school name for the purpose of doing business. However, if the institution desires to use the corporate name in advertising, it must be in compliance with NACCAS Policy on Advertising and clearly identify the institution as a school.

## **Standard IV**

### **Criterion 1**

#### **Guidance**

- While the school’s admission policy has to be in the catalog, it is not the intent of the commission for the policy to list every single type of document that determines the school’s eligibility enrollment.
- Ability-to-Benefit students that are completing the required 225 clock hours cannot receive financial aid before completion of those hours. Such students must be enrolled with a contract and receive a report showing whether or not they have satisfactorily completed the 225 hours.
- The admissions policy language was taken from the Department of Education. It is the Commission’s objective that if the on-site evaluation team is in doubt concerning the admissions policy, the team may choose to cite a limitation and then to let the Commission decide. A school does not have to be accredited by a USDE recognized agency.
- It is the Commission’s intent that verification of a foreign student’s high school documentation must be conducted by an outside agency that is qualified to translate documents into English and confirm academic equivalence to a U.S. high school diploma.
- If a state has specific requirements for how home-school education would be equivalent to that state’s secondary education and the school can provide evidence that the student has met those requirements, NACCAS will accept that documentation. Anything less than this level of documentation will not be accepted.
  - Examples of documentation an institution may provide for this criterion and policy item are:
    - A state-issued credential for completed home-schooling; OR
    - A state-issued license to operate as a home school provided by the place where the equivalent education took place, along with verification (certificate/transcripts) indicating the student completed the program; OR
    - A state-issued license to operate as a private school provided by the place where the equivalent education took place, along with verification (certificates/transcripts) indicating the student completed the program; OR
    - Documentation from the state outlining the regulations and a list of businesses approved, along with verification (certificate/transcript) indicating the student completed the program.

### **Criterion 1 and Policy IV.01**

#### **Guidance**

- It is the Commission’s intent that verification of a foreign student’s high school diploma must be performed by an outside agency that is qualified to translate documents into English and confirm the academic equivalence to a U.S. high school diploma.

### **Criteria 4, 5, 6, and 18**

#### **Guidance**

- Access simply means access. It is the school’s choice whether to provide a copy to each student in any printable media format or to maintain one copy that the student can access. It would then be the student’s responsibility to request a personal copy to keep.

### **Criterion 14**

#### **Guidance**

- The term “articulation agreement” can be found in the Glossary of the Handbook. Articulation agreements are not required between main campuses and its additional location. The Commission only requires that if schools have an articulation agreement that a list is maintained by the school.

**Criterion 15**

**Guidance**

- In the event the team suspects that a diploma found in a student's file is not valid it is the school's obligation to prove that the document is valid. Barring such proof, the team is directed to write a limitation and cite it under this criterion.

**Standard V**

**Criterion 1**

**Guidance**

- As long as permitted by law a student may receive hours for orientation on the first day of class provided they are already enrolled in the program.

**Criterion 4**

**Guidance**

- "Professional Assistance" as defined by this criterion refers to emotional, psychological, physical or financial needs of the students.

**Standard VI**

**Criterion 4**

**Guidance**

- The purpose of the course outline is to ensure that all the required elements are prepared and provided to students for the course and/or program enrolled. If the institution has an individual course outline for three different components or short courses that are combined to form a longer course, the institution is considered to be in compliance with the NACCAS course outline requirement. However, the Commission does not require the institution to provide course outlines for modules or units.

**Criteria 4 and 5**

**Guidance**

- Any approved program not currently being taught must be in compliance with all elements listed in Criterion 4 and 5. Institutions are not required to have already hired an instructor, however, must have a written plan describing how faculty members will be ready to hire prior to the start of the program and must meet the requirements outlined in these two (2) criteria.

**Criterion 6**

**Guidance**

- It is the Commission's intent that students and teachers are provided access to current reference materials that would include other media that may not be printable, such as You Tube, DVDs, etc.

**Criterion 7**

**Guidance**

- It is the Commission's intention is that evaluators should check the regulatory agency's statutes or regulations to determine how each license is defined and what practices each licensee is authorized to perform in order to determine if the curriculum elements are sufficiently preparing the graduate for licensure and employment. In absence of such agency oversight the teams are to research elements of state or national exams, when applicable.

**Criterion 10**

**Guidance**

- Academic learning and practical learning must still precede advancement to the student salon or clinic activities. Academic learning is defined as a “The acquisition of knowledge and skills.”

**Criterion 11**

**Guidance**

- It is the Commission’s objective for schools and teams to recognize that academic and practical learning can take place in a variety of venues (not just in a “classroom” setting). The Commission wants to allow schools to be creative in their delivery of instruction. However, it should also be very clear that “conceptual learning” is also done in the clinic. It is not the Commission’s intention to eliminate the requirement for classroom instruction. Additionally the Commission does not expect schools to utilize all of examples outlined in this criterion.
- It is the Commission’s intent that teams should not expect to see all of the instructional methods listed in this criterion, as this is a non-exhaustive list of different types of instructional methods available to schools.

**Criterion 13**

**Guidance**

- It is expected that a school will offer scheduled and organized education. NACCAS staff will ask how the school’s education schedule works in planning for a visit.

**Standard VII**

**Criteria 4, 5, 6, and 7**

**Guidance**

- It is the Commission’s objective that the on-site evaluation team will need to verify both accuracy and timeliness of refunds for those calculations done according to its federal -, state- and/or program-mandated policy. If the state has a policy, but allows the school to follow its accrediting agency policy, the school must be in compliance with NACCAS. Unless superseded by a state-mandated or program-mandated refund policy, the school shall adopt a policy that complies with the NACCAS Withdrawal and Settlement Policy and Checklist.
- It is the Commission’s position that return to title IV is not considered a refund. This is a return of federal financial aid. Therefore, if a school participates in a title IV program, the school must also do an institutional refund calculation or applicable refund calculation after the return to title IV has been made.
- Teams are to verify that the R2T4 calculation was completed, but are not to verify for accuracy. If the R2T4 is not in the file, the team is directed to ask the school if they are kept elsewhere. If they cannot be provided, the team should cite the finding under Standard III, Criterion 3.
- Teams are to refer to item 5 of the checklist to determine if an institution is calculating refunds based on actual hours or scheduled when determining length “completed” above.
- Teams are to understand that NACCAS is concerned with three dates with respect to the Withdrawal and Settlement Policy and Checklist as follows:
  - The student’s Last Date of Attendance
  - The formal cancellation date or date the institution determined the student has withdrawn
  - The date of the refund, if applicable

- Teams are charged with the responsibility of determining that a refund is made within 30 days (or 45 days per policy) of the date the drop was determined. For example, if the student's LDA is listed, the date of determination must occur within 30 days and the refund must be made within 45 days of that date. However, the school might not get around to completing the form until 10 days AFTER the formal cancellation date, but the refund is still due 45 days from the formal cancellation date
- It is not the Commission's intention for schools to be cited if they bill students daily, weekly, or monthly for extra instructional charges after all allowable absences have been exhausted even if they student ultimately drops before the contract ending date. The philosophy is that it is no different than allowing schools to bill students for missed Saturdays, for example, which NACCAS already allows.

### **Criterion 7 and Policy VII.01 – Items 4, 6, and 17**

#### **Guidance**

- Regarding documentation required to ensure students receive refunds within the specified time frame based on the institution's policy that is in compliance with NACCAS Withdrawal and Settlement Policy and Checklist: teams are to accept the following types of documentation (a non-exhaustive list):
  - Cancelled check
  - Bank reconciliation
  - Signed receipt of delivery
  - Copy of certified delivery receipt
  - Proof the check was returned as undeliverable

### **Policy VII.01 – Item 4**

#### **Guidance**

- It is the Commission's intent that institutional refund calculations are performed within 45 days of the date of determination on all dropped students and there is evidence of the calculation found in the student's file.

## **Standard VIII**

### **Criterion 4**

#### **Guidance**

- It is the Commission's intention that the restriction on the use of classroom and service facilities apply during "normal business hours" as published by the institution. Classroom and service facilities may be used for other educational purposes outside of the institution's established normal business hours.

### **Criterion 6**

#### **Guidance**

- It is the Commission's objective that the public must be able to clearly differentiate between a professional service facility and the school (i.e. separate advertising and operations, whether the salon operates in a student prohibited area of the facility in the evening while the school is not in operation or the school and the salon are next door with separate facilities). Students must not be able to transition between either facility for educational purposes or other unacceptable practices (i.e. working in both the salon and performing services in the clinic). It should be noted the school will have to comply with all state regulations regarding its operation and facilities when considering operation of a professional service facility and a school under the same ownership or otherwise associated.



**Criterion 7**

**Guidance**

- It is the Commission’s objective that the public is aware that services will be received by students. As long as the school’s signs make this apparent, the school would be considered to be in compliance.
  - Example: It is acceptable for a school to have a sign advertising a price for services next to the sign that indicates that it is a school. The price advertisement does not have to have the statement “all services performed by supervised students.”
  - Example: It is acceptable for a school to have the sign “Beauty School” without this name having to be listed as an “other name used” as long as the name of the school is displayed on the building.
  - Example: The school may have an “other name used” as its sign. It does not have to be the full name of the school as long as NACCAS has approved of the alternate name, and the name complies with the *NACCAS Policy on Advertising*.

**Standard IX**

**Criterion 1**

**Guidance**

- Institutions are expected to evaluate students in each of the three areas. However, in a credit hour program, attendance may not be provided. In a distance education program, practical learning may not be provided.

**Criterion 2**

**Guidance**

- It is the Commission’s objective that written practical grading criteria should be written in a way that ensures that two different instructors evaluating the same practical skills set should arrive at the same grade.

**Criterion 6**

**Guidance**

- The Commission does not require that documentation of regular SAP evaluations be found in the student file if the school can demonstrate that they are performed as policy requires (such as electronically or maintenance of documents found in another location).
- Further, if a student is placed on probation or determined not making SAP, the school must be able to document proper notification to the student including what actions must be taken to re-establishment SAP.
- If the institutions are doing SAP evaluations on scheduled hours, then the evaluation should be based on how many hours were clocked up to the scheduled 450 hour point. If the institution is doing evaluations on actual hours, the institution should be able to pinpoint the day the student actually clocks 450 hours. That means the student might get to 450 at 10:00 am so the evaluation might show 456 hours at the end of the day. In a clocked hour situation, the Commission will allow a three (3) day grace period to actually document the evaluation. The three (3) days grace period is specific to when the SAP report must be generated and is to be within three (3) open business days before or after the student has reached the published SAP evaluation point.

**SAP Checklist**  
**Guidance**

- **Item 6** for both clock hour and credit hour institutions: It is the intent of the Commission that institutions have a policy regarding maximum time frame. However, the institution must terminate disbursing financial aid, if applicable, to any student who has exceeded the maximum time frame. The student at that point can become a private pay student if the school's policy states that as an option. Schools that choose to allow this as an option should also be aware that this may negatively impact their outcomes as the student may be a non-completer for the Annual Report.
- **Item 10:** It is the Commission's objective that the phrase "similar in length" means that an institution evaluates its students at equal intervals, such as:
  - 450 clock hours, 900 clock hours, and 1350 clock hours or for institutions that evaluator monthly, the 15<sup>th</sup> of every month.

The Commission recognizes that certain evaluations may not be equal in length due to an academic year or program length, such as:

- A 1500 clock hour program, with a 900 clock hour academic year, the evaluations could be at 450, 900, 1200 and 1500 or for a 1000 clock hour program, at 300, 600, 900 and 1000 clock hours. It is not the intention of the Commission that evaluation periods be identical in length.

The Commission understands that an institution may evaluate SAP within the first 150 clock hours of a program, however, if the institution designates this as its 1<sup>st</sup> evaluation within its SAP Policy, and then evaluates SAP at 450 and 900 clock hours, this would not be considered similar in length.

An institution may evaluate SAP more frequently than its policy establishes, however, at a minimum it must follow its own policy.

- Items 16d for clock hour institutions and 15d for credit hour institutions means that if an institution develops an academic plan for the student that, if followed, will ensure that the student is able to meet the institution's satisfactory academic progress requirements by a specific point within a maximum timeframe established for the individual student that may be extended based on the student's approved appeal.
- Item 21 for clock hour institutions and 20 for credit hour institutions:
  - A student is considered a re-entry student if:
    1. They are re-entering the same institution, whether as a newly contracted student or re-enrollee,
    2. They are re-entering at a campus from the same family of schools (exact ownership), whether as a newly contracted student or a re-enrollee,
    3. The program they are re-entering is the same cost, content, structure, hours, etc., as the program they left,
    4. The student re-enters in the same status as when they left to include grades, attendance, impact on maximum time frame, SAP status, etc.,
    5. The SAP Policy for both the original campus the student was enrolled at and the campus receiving the re-entry student allow for such a practice.