

TEAM REPORTS: WRITING CLEAR AND EFFECTIVE LIMITATIONS

A clear and well-written Team Report serves as an important foundation for future steps and actions in the accreditation process. Limitations must be clear and effectively structured to aid smooth execution of the accreditation process. Remember that Commission decisions and its resulting action letters are based on these limitations. Listed below are some factors to keep in mind when composing limitations for your team reports.

1. Consider your readership.

Team reports are read by several different individuals, some of whom may not be familiar with the accreditation process. For this reason, it is especially important to communicate as clearly as possible.

Individuals reading the Team Report may include:

A. School Staff

Clearly written limitations give schools a better understanding of the team's findings and, therefore, a better idea of how to respond properly;

B. Commissioners

Since the commissioners were not present for the team visit, it is important to provide them with the clearest possible picture of the school. Furthermore, the more specific information provided, the better equipped commissioners are to make a determination. Ideally, detailed limitations leave little room for assumption;

C. Accreditation Specialist writing action letter

A well-structured limitation provides a solid foundation for identifying the area of noncompliance and for verifying the Commission's assessment of the school's response. It also helps prevent the possibility of penalizing the school for failure to demonstrate compliance with something not originally cited;

D. USDE Official or outside reviewer

It is important to demonstrate consistency and clarity for an outside reviewer. Limitations should be logical and substantiated with available data so that those unfamiliar with the accreditation process or with the school can understand the nature of the limitation;

E. Judge

There is a possibility that a school will sue. In this instance, it is vital that the team report is clear so that a judge can understand the exact nature of noncompliance. Ambiguity can prove extremely detrimental in this instance;

2. Identify the issue as it relates to the Standards and Criteria, Rules, or other pertinent NACCAS policy.

Refer to the specific standard and criterion, section of the Rules or policy item when citing limitation. This provides you with a specific authority to cite (thus strengthening your limitation) and helps to prevent limitations based solely on evaluator opinions. This practice also helps to avoid the "show me where it says..." problem. For example, including the numeral and letter pertaining to a specific item of the Satisfactory Progress Policy Checklist would be effective in identifying areas in which the school's satisfactory progress policy does not comply.

3. Avoid confusing the issue with ambiguous or extraneous material.

For example, you would not want to include a glowing commentary about a school's methods for gathering data from current student surveys in the body of a limitation regarding the school's failure to solicit

feedback from the advisory committee or graduates. Likewise, inserting negative statements into comments can also prove confusing and could prompt the reader to wonder why the school was not cited for that particular issue.

4. Specify exactly where and how the team determined noncompliance.

Did you find it in file review? Did the school owner admit it or inform you? Was it revealed through student interviews or the team's observation? Stating the source of the team's finding strengthens the limitation and can help to avoid confusion and argument during the exit interview. If you have two or more sources, make sure that you include them in the limitation.

5. Quantify your findings.

Whenever possible, state the exact number of files reviewed by the team and/or the number of interviews revealing the area of noncompliance, etc. This practice helps in demonstrating whether the violation is of a systemic or incidental nature.

Example: *“The team reviewed the files of five students whose enrollments had been terminated; four of these files contained refund calculation sheets indicating that refunds were not performed within forty-five days of the date of withdrawal determination as required by the NACCAS Minimum Cancellation and Settlement Policy. Specific details for each file are listed below.”*

6. Clearly outline a school's policy or requirement when citing its failure to implement or follow this policy.

Often a limitation will be cited by the team if a school does not implement its own policy consistently. For instance, this often occurs with the satisfactory progress policy. Since readers of the Team Report are not familiar with the school's particular policy, outline the pertinent section of the policy that is not being enforced and explain exactly how the school is failing to enforce it. Attach a copy of the policy as an exhibit to the team report.

Example: *“The school's published satisfactory progress policy states that students must attend at least 80% of all possible hours each month. If a student does not attend the minimum number of hours, he or she is placed on probation. If the student does not improve within the probationary period, he or she is to be terminated. Review of student progress records revealed that students not meeting the minimum attendance requirements are not always placed on probation; furthermore, students that are on probation are sometimes allowed to remain on probation for several consecutive months without being terminated by the school. Seven of ten current student files reviewed by the team revealed that students had unexplained absences for durations of sometimes several months. Although the school made an effort to contact these students and persuade them to return to school, these students should have been placed on probation and/or terminated, as per the school's published policy. Specific examples follow...”*

7. Consider possible consequences of a specific area of noncompliance.

If a school fails to show compliance in one area, it often affects its ability to demonstrate compliance in another. For example, if a school does not solicit feedback from its advisory committee, it cannot provide evidence of systematic assessment of such feedback or of changes or improvements resulting from this feedback. Include this in your limitation; do not merely cite the school's failure to gather feedback. This helps to avoid problems later in the process when commissioners may want to penalize the school for not providing evidence in its response of assessment or of resulting changes, when the school was not originally cited in these areas. In addition, it provides the school with a better understanding of the concept of outcomes assessment as a continuous, multi-step process.

Example: *“On the day of the visit, the school did not have evidence that it seeks feedback from its advisory committee for improvement of the school's programs and services. Consequently, the school did not have evidence of assessment of advisory committee feedback or evidence of changes made to the program as a result.”*

8. Attach examples and exhibits to support limitations.

Sometimes a written description alone does not prove adequate to demonstrate a school's level of noncompliance with a particular criterion. This can be especially true in instances of confusing refund situations. In this case, for example, it may be helpful to append copies of the school's refund policy along with copies of the completed refund calculations of students in question to the Team Report. This practice helps to strengthen limitations and to verify exactly what was found on site on the day of the visit.

9. Your opinion doesn't count.

Record only what is observed on the day of the visit. Do not editorialize or insert opinions into the report. Avoid statements like "the team felt..." and "the team was concerned..." Remember that the team is a fact-finding body only. Limit your findings to the Standards and Criteria or other pertinent NACCAS policies.

10. Avoid jargon and vague terms or wording that may cause confusion.

Regarding jargon, remember that your readers may not be familiar with technical terms or in-house "buzzwords" such as "SAP", "ATB", or "blanket release". Spell these terms out or explain their meaning. To avoid misunderstanding, use clear phrases like "there was no evidence," "the team found," "the school did not have," instead of "the school could not show," or "the team didn't see." In cases when there is a purported reason on the part of the school for not having a particular item (for example, the school states that the item is kept elsewhere), the limitation, while stating that the school could not provide something, must also provide the reason for that failure.

Example: *"The team could not review (or the school couldn't provide...) student counseling records because, according to _____ (name the source of your information), the counseling files are kept at the corporate office in another state."*

11. Keep the burden of establishing compliance with the school.

Do not use terms such as "the team was unable to find..." This suggests that the team may have been able to obtain something that would demonstrate the school's compliance with a particular criterion but somehow failed to do so. It is the school's responsibility to demonstrate compliance; use phrases to reinforce this concept; such as, "The school did not have..." or, "the school does not..." (and name what the school does not do).

12. Proofread!!