Message from the Chair

DR. LINDA SWISHER

This is the final article that I will write as Chair of your Commission. These past three years have flown by and it has been such a beautiful experience to serve you. ABHES is truly a “well-oiled machine.” To have the privilege of working with each staff member and commissioner over the years, to watch the volume and quality of work produced by our Commission and staff; both are unique and wonderful privileges. I thank you most sincerely for the experience and I wish my dear friend and successor Florence Tate the same incredible journey. What ABHES has accomplished in the years I have served as a commissioner is truly incredible and is a testament to the strength and dedication of your accrediting agency. I know ABHES’ success will continue.

Each year that I served as your Chair, I selected a theme and challenged our Commission and staff to achieve various objectives surrounding that theme. I also used the Advantage to periodically challenge the membership to achieve specific goals. It therefore seems appropriate that I leave office with a final challenge to you.

“Though no one can go back and make a brand new start, anyone can start from now and make a brand new ending.” - Carl Bard

When I was selecting the theme for this last year, my thoughts naturally drifted back to the many accomplishments of the Commission and staff and what the legacy of the Commission would be during my tenure. Sadly, we often wait until retirement or until the end of a period to develop, evaluate or revise personal or professional goals and objectives. Our legacy should always be a “work in progress” and should be assessed regularly so that the “gift” that we pass on to the next generation or to our successors is just as we had envisioned it.

This year I asked each Commissioner and staff member to develop a page for a scrapbook that will be given to ABHES. The page was to represent what that person would like to leave as their legacy to ABHES. It was an exercise that demanded introspection and vision and your Commission and staff rose to the occasion. Turning the pages of the scrapbook reinforced what a dedicated and committed group they are and how fortunate I was to have them support my leadership role over these past few years. Their “commitment to excellence” is consistent throughout the book and will be passed on for years to come as an integral part of their legacy.

I now challenge you to think about what you would put on your page and the pictures that you would include to support your desired legacy. What do you want people to remember about you when you leave health education? Were you an outstanding teacher? Were you a wonderful administrator? Did you change students’ lives? Were you a role model for the profession? Begin to plan and live your legacy today. Think about it; what will YOUR legacy be?
A Word from the Executive Director

With summer in full swing and a calming trend hopefully greeting us all for a few months, I thank the ABHES Commission and staff, committee and panel members, evaluators, and many others who give of their time and expertise for making the first part of 2013 a time of success and exciting change. Without our wonderful volunteers, our responsibilities simply could not be accomplished.

One person stands out as simply exceptional. Dr. Linda Swisher has served ABHES, most recently as Chair, bringing not only to the commissioners and staff, but also to our accredited institutions and programs, an enthusiasm and professionalism I have never experienced in a leader. Best of all, Linda has made ABHES a real family - full of hard work, difficult decisions, love and, yes, even some disagreements. I would personally like to thank Linda for all she has done for ABHES over the years and for me personally and professionally. We will miss her at the helm, but look forward to welcoming our new Chair, Florence Tate.

I would be remiss not to call attention to two great leaders in accreditation, as we have seen Mike Lambert, former Executive Director of the Distance Education and Training Commission (DETC) retire in April and will soon bid farewell to Roger Williams, Executive Director of the Accrediting Council for Continuing Education and Training (ACCET). Both have long and distinguished careers with their respective agencies, with Mike’s spanning 40 years and Roger’s 25 years. Both have been staunch advocates of quality in postsecondary, private education and their agencies’ successes have proven their dedication. I have learned much from each of them. Best to you both, my friends.

Enjoy this most recent edition of the Advantage with an array of exciting news, including success stories from our members, a message from our incoming Chair, several important staff updates, and recent regulatory highlights.

Carol Moneymaker, Executive Director

Remarks from ABHES’ Incoming Chair

Florence Tate

Words that will forever remain in my mind and culminate at every accrediting Commission meeting in which I have participated when the “question” is called are “The Commission has spoken”. Learning that the Commission had both nominated and appointed me as its next Chair, choosing me to lead this outstanding group of professionals for two years, was very sobering.

Six years ago, I joined the Standards Review Committee of ABHES, and while sitting at my desk today, I looked at the list of many committee members serving ABHES. Each of these individuals, both current and past, give unselfishly to not only the ABHES organization, but to you as a member. There is great diversity among this group: public members, members of large and small institutions or programs; practitioners in a health care field, and educators, both current and recently retired. Those representing ABHES’ accredited institutions and programs most importantly represent the thousands of students who have chosen their institutions or programs to acquire an education that will lead to a chosen career in allied health. We represent the souls of our industry, and as we dedicate ourselves to those souls, we will have fulfilled our purpose and demonstrated to all of our constituents the value of ABHES accreditation, and those who attain it. That is our duty, our accountability, and it is how we will lead.

I send my thanks to the ABHES Commission for their support as I look forward to our working together as we continue our mission of educating today’s students for tomorrow’s healthcare careers.

Carol Moneymaker, Executive Director
Pima Medical Institute Celebrates 40 Years

This past year, Pima Medical Institute (Pima) celebrated its 40th anniversary. Founded in Tucson, Arizona in 1972, by Richard (Dick) Luebke, Sr., Pima continues to be a “family operated” educational system that prepares students for the types of medical careers to meet the demands of the community. In its estimate, Pima has graduated over 74,000 students, many becoming productive health care professionals following their studies in certificate, associate degree, and/or bachelor degree programs. Over the years Pima has grown from one campus to 13 campuses across the Western United States.

ABHES congratulates Pima on this milestone and thanks it for its continued dedication to excellence in healthcare education!

Pima Medical Institute has held institutional accreditation by ABHES, for its Tucson campus, since 1982. Twelve other campuses followed with the most recent grant of accreditation awarded in 2010.

Join ABHES at its 11th Annual National Conference on Allied Health Education!

February 26-28, 2014
Gaylord Opryland Resort and Convention Center, Nashville, TN

A variety of health-care education and regulatory sessions are sure to please! If interested in leading a breakout session, visit www.abhes.org to complete a speaker proposal which is due via e-mail no later than Thursday, August 1, 2013, per the instructions on the website.

Pre-conference workshops:
• Programmatic Accreditation - Monday, February 24
• Institutional Accreditation - Tuesday, February 25
• Evaluator Trainings – Tuesday and Wednesday, February 25-26

Opening Reception
• Wednesday, February 26, 5:00 p.m.

ZUMBA Returns
• Thursday and Friday mornings, February 27-28
Anyone can join in the fun!

Visit www.abhes.org for schedule and registration (scheduled posting: fall 2013)
Preferred College of Nursing Marks Nurses Week

Preferred College of Nursing, Los Angeles (PCN, LA), California, held its culminating activity for Nurses Week on May 10, 2013. National Nurses Week begins each year on May 6th and runs through May 12th, the birthday of Florence Nightingale, the founder of modern nursing.

To promote a positive, realistic image of nurses, PCN, LA held an Open House and conducted preventive screenings (free blood pressure readings, Blood Sugar Testing and Body Mass Index counts). Each nursing class, with their class advisor also showcased exhibits to educate the public regarding Heart Disease Prevention, Cancer Awareness, Tobacco Use Prevention, Proper Diet and Nutrition. The theme for this year was “Delivering Quality and Innovation in Patient Care.”

To advocate for the profession and promote the value of nursing, local politicians and other members of the community were invited as special guests. Guest of honor was Gil Garcetti, two-term Los Angeles District Attorney and father of incoming mayor, Eric Garcetti. Other guests included representatives from F.A. Davis, Lippincott Publishing, and Laerdal Mannequins. A mini-job fair was also held to provide employment opportunities for the graduates. Local nursing agencies received resumes and interviewed graduates on the spot.

In the afternoon, the school also held “Jeopardy- Nurses Edition.” Each class fielded representatives who answered questions on Fundamentals of Nursing. The winning exhibit (“Tobacco Use Prevention”) was also announced. Prizes were donated by F.A. Davis and Lippincott Publishing. Coffee Bean and Tea Leaf provided refreshments.

National Nurses Week was first observed in October, 1954. It marked the 100th Anniversary of Florence Nightingales’ mission to Crimea. In 1982, President Ronald Reagan moved Nurse Recognition Day to May 6, 1982. In 1990, the American Nurses Association expanded the recognition of nurses to a week-long celebration, declaring May 6-12, 1991 as National Nurses Week.

Preferred College of Nursing, with campuses in Los Angeles and Van Nuys, California, has held institutional accreditation by ABHES since 2008.

7,000 Trained in Hands-Only CPR™ – And We Helped

The medical assisting department and six of the medical assisting students at the Globe University, Woodbury, Minnesota, campus were honored at the City of Woodbury’s Take Heart Woodbury ceremony for their help in training 7,000 community members in Hands-Only™ CPR.

“I am very proud of how our community responded to the call for participation in the Take Heart Woodbury Hands-Only CPR program,” said the City of Woodbury Mayor, Mary Giuliani Stephens. “We now have more than 10 percent of our community’s population trained to act in case of a sudden cardiac emergency.”

The City of Woodbury’s Public Safety department launched Take Heart Woodbury with the goal to train 7,000 people in our community on Hands-Only™ CPR. The goal of Take Heart Woodbury is to educate people about cardiac arrest and empower members of the community to assist an adult who suddenly collapses.

“The opportunity to train the community in the Take Heart Hands-Only™ CPR was a fantastic experience for me,” said Globe University medical assisting student, Houa Her. “This allowed me to learn Hands-Only CPR myself and I was able teach the Woodbury community. It was an honor to help people learn how to help other people in case of a cardiac arrest or emergency.”

Students honored at the City of Woodbury’s Take Heart Campaign included Nula Watson, Rochelle Witzel, Houa Her, Tara Hansen, Stephanie McCutcheon and Sara Kaszas.

Hands-Only™ CPR is a simplified method of CPR that requires no mouth-to-mouth breathing. It is a two-step technique that involves calling 911 and pushing hard and fast in the center of the victim’s chest until help arrives.

The City of Woodbury aims to earn a Heart Safe Community designation from Allina Hospitals and Clinics by educating the residents and business owners of Woodbury on Hands-Only™ CPR. The city continues to seek local businesses, churches, schools, and organizations to participate in Take Heart Woodbury.

Globe University in Woodbury, Minnesota, has held programmatic accreditation by ABHES for its medical assisting program since 2010.
Welcome!

Kelly Costello and Mary Margaret Coughlin joined the ABHES family as accreditation coordinators on June 3. Their sole responsibilities, initially, will be those related to coordinating and traveling on-site visits.

Kelly, an Arlington, Virginia resident, graduated from University of Miami, Coral Gables, Florida, in 2011 with a B.A. in History and Psychology. Following graduation, Kelly was a curatorial intern at the Smithsonian and the U.S. Supreme Court. In February 2012, Kelly continued her penchant for sharing history by serving as a visitor service representative at the Newseum.

Mary Margaret, a Rockville, Maryland resident, graduated from Mount St. Mary’s University, Emmitsburg, Maryland, in 2008 with a B.A. in Communications. Upon graduation, Mary Margaret served as a manager’s assistant in the financial services firm Morgan Stanley Smith Barney and for the past year was employed at Coughlin Transportation Inc., a company that provides private bus services. She managed human resources, processed accounts payable, and planned and organized events, including site research and budget and expense management.

Welcome Kelly and Mary Margaret!

Promotions

Congratulations are in order for two ABHES staff members who were recently promoted.

As she enters her 10th year with ABHES, Amy Rowe assumed a newly-created position, Director of Compliance & Reporting, effective May 1, 2013. Amy's functions will remain focused on institutional annual reporting, including co-staffing the Annual Report Committee. She is also involved in coordinating preliminary site visits to initial applicants for accreditation, serving as co-staff liaison to the Standards Review Committee, and website development, to name a few of her other responsibilities.

Congratulations to Christy Baily-Byers who was promoted to Manager of Communications & Training, effective June 3, 2013. Christy began her career with ABHES in January 2011 with a focus on distance education. While she will continue that focus, her role is expanding. Among other responsibilities, Christy will manage the development of training workshops, both online and on site, for potential and current ABHES evaluators. She will continue to coordinate some of the visits in which education is delivered by distance.

Thank you, Amy and Christy, for all of your contributions and dedication to ABHES!

Trish Moves On

ABHES staff and commissioners were sorry to learn recently that Trish Laughlin, Senior Accreditation Coordinator, will be leaving us in September. Trish began her career with ABHES in 2010 and has continuously grown in her role, producing excellent work and adding great enthusiasm with her contagious smile and boundless energy.

In Trish’s words....“It comes with mixed emotions that I share some news with the ABHES membership and others I have come to know so well. In the fall, my husband and I will be moving to Amman, Jordan for two years. Although this is a very exciting opportunity for us, I am very sad to be leaving my fellow staff members, evaluators, commissioners, and personnel at the institutions I’ve worked with over the past 3 years. I can’t begin to describe how much I’ve learned and enjoyed working in accreditation and I will truly miss this connection with ABHES.”

While we will miss Trish a great deal, ABHES wishes her well on what is sure to be a fabulous adventure. Thank you, Trish, for all you have done for ABHES.
It was on August 14, 2008, after five years of extensions, that the Higher Education Opportunity Act of 2008 was signed into law. Now we are ready to embark on a new reauthorization process. By the end of this year, the Higher Education Act (HEA) is set to expire on September 30, 2014, although there is an automatic extension of the law for an additional fiscal year. So while reauthorization is not imminent, many people are beginning to think about it.

Most recently, on April 25, 2013, the House Committee on Education and the Workforce began seeking input on the HEA reauthorization from students, parents, college leaders, and higher education stakeholders by asking them to share their views and amendments for the upcoming reauthorization of the HEA. Chairman John Kline (R-MN) said: “These policies affect families nationwide, and the committee must carefully consider feedback from the public as we develop proposals to strengthen the law.” Ranking Member George Miller (D-CA) said: “It is my hope that the results of this process will help ensure that all qualified students have access to the quality and affordable education they need to succeed in the 21st century.”

The House Education Committee is seeking comments and recommendations on a wide range of issues particularly in the following areas:

• How to empower students as consumers;
• Simplify and improve the student aid and loan programs;
• Increase college accessibility, affordability, and completion;
• Encourage institutions to reduce costs;
• Promote innovation to promote access to and delivery of higher education; and
• Balance the need for accountability with the burden of federal requirements

The House asks for specific ideas and suggestions not later than August 2, 2013 at: HEA.Reauth@mail.house.gov.

While the House Education Committee officially kicked off the process, one of the first issues that has already faced an extensive dialogue in preparation for reauthorization is the role of accreditation. In September 2010, the National Advisory Committee on Institutional Quality and Integrity (NACIQI), the entity that recognizes accrediting agencies, received a charge to provide advice to the Secretary of Education on the reauthorization of the HEA. NACIQI conducted a thorough review of the current system of recognition, accreditation, and student aid eligibility. After consideration of comments from federal and state officials, from accrediting agencies, from beneficiaries of higher education, from accredited institutions, and from experts in education policy, NACIQI issued a report, “Higher Education Act Reauthorization: Accreditation Policy Recommendations,” in April 2013.

One of the ongoing debates during the review process was whether accreditation should continue to serve as a gatekeeper for institutional eligibility for student aid and a mechanism of public accountability as well as serve its broader function of ensuring educational quality. Ultimately, NACIQI concluded, although not unanimously, that the Department should retain the link between accreditation and federal financial aid eligibility: “In making the recommendation to retain the link between accreditation and federal financial aid eligibility, we recognize that this is a time of considerable focus on quality in higher education, with emerging areas of serious concern about value, standards, outcomes, cost, transparency, and accountability. Accreditors and their various constituencies must confront these challenges vigorously and do so in ways that continue to offer significant value and rigor in quality assurance.” [It should be noted that two members of NACIQI submitted an alternative set of recommendations, which included a recommendation to break the link between federal student aid and accreditation. “It is time to return to the original vision of accreditation: peer institutions advising and critiquing one another in a voluntary, yet rigorous system of self-improvement.” According to these two members, to continue to act as private peer review teams and as gatekeepers of federal student aid is a conflict that should be eliminated.]

Accompanying the recommendation to retain the link between accreditation and aid eligibility were a number of observations and recommendations about the three main actors (federal, state, and accreditor) where NACIQI observed that there are both overlaps in responsibilities and gaps where necessary responsibilities are not fully covered. NACIQI recommended that the roles and responsibilities of each member of the triad be clarified. According to NACIQI, the accreditation system serves as
a critical process in ensuring academic quality. Further, in retaining the link between accreditation and aid eligibility, accreditors need to recognize the emerging areas of concern “about value, standards, outcomes, cost, transparency, and accountability.”

In addition to a shared interest in academic quality, States play a critical role in ensuring consumer protection and prevention of fraud and misleading commercial promotion. NACIQI also pointed out that the presumption that state boundaries define the delivery and oversight of education may be inconsistent with the newer methods of delivery of education that are not tied to boundaries. Therefore, NACIQI recommended evaluating the diversity of state regulations and the need to shape them in order to recognize the growth of cross-state educational activities.

Finally, NACIQI pointed out that the strength of American higher education rests with having freedom from federal determination of institutional quality and self-improvement processes. The responsibility on how well an institution is accomplishing its educational mission rests with the accrediting agencies and not the federal government. The federal government’s role should be one that coordinates the communication among the members of the triad, which will help ensure that taxpayer funds are only used for acceptable educational activities.

A final set of recommendations from NACIQI relates to the importance of good data. The report notes that the usefulness of the current data to consumers, institutions, accrediting agencies, or the federal government has been questioned because of inconsistent definitions that “limit data comparability and policy reliance.” NACIQI recommended that all data collection activities be evaluated relative to its utility and use and that a set of consistent definitions be developed along with the appropriate metrics for use by all members of the triad.

In line with the emerging areas of concern described by NACIQI, the Obama Administration expressed concerns about the need to modify the role of accrediting agencies following the State of the Union address. In a White Paper released on February 13, 2013, the day after the State of the Union address, the Administration called for “major changes to the criteria accreditors use to evaluate colleges, asking Congress to either require accreditors to take college prices and educational value into account or to create an alternative system based on ‘performance and results.’” The President concluded that all students should get “the best bang for their buck.”

Clearly, the role and responsibilities of accreditors will be examined during the reauthorization discussions. While the Republicans and Democrats generally do not take the same view on most issues, both sides of the aisle agree that there should be a focus on value, outcomes and affordability during the reauthorization process.

Others topics of discussion that will be addressed during the reauthorization process include the simplification of the student aid delivery process and the need for increased transparency of information, specifically outcomes information, so that students and their families can make good decisions about going to college. The Bill & Melinda Gates Foundation sought input to redesign the federal student aid system along with recommendations for reauthorization. Fifteen position papers representing a $3.3 million effort were issued to address the need to overhaul the delivery system. Under the Reimagining Aid Design and Delivery Project (RADD Project) many of the recommendations argued for stronger accountability measures that would hold colleges responsible for their tuition costs, their completion rates, and the student loan repayment rate. Some recommendations called for new methods to encourage students to complete their programs. Many of the recommendations criticized tax credits as poorly targeted benefits. However, many of the recommendations from the 15 organizations are in conflict and produced very little consensus. Nevertheless, there was one unifying recommendation that resulted from the RADD project, which was to simplify the financial aid system. Several groups recommended “one grant, one loan” system. Eight of the 15 groups promoted the adoption of a universal income-based repayment plan to address the overwhelming student loan debt facing many graduates and their parents. Another point of overwhelming agreement was the need for a better federal government collection system and for more information on persistence and graduation.

With the call for more student performance measures and transparency, there is growing agreement that there should be a federal unit-record system to collect individual data on students. The idea of a unit-record system was promoted by former-Secretary of Education Margaret Spellings under the Bush Administration. Opposition was loudly heard from the nonprofit educational institutions and the Republicans who feared the loss of privacy and the release of confidential information. In fact, a provision included in the Higher Education Opportunity Act of 2008
prohibited the development of a unit-record system. Instead, the HEOA called on the States to implement their own systems of data collection. But times have changed and a bipartisan bill that was introduced in the Senate titled, the Student Right to Know Before You Go Act (S. 915), calls for the establishment of a federal unit-record database that replaces IPEDS where data could be disaggregated by program, institution, and employment sector. In a summary released by one of the co-sponsors, Ron Wyden (D-OR) said: “Students have a right to know how long it will take them to complete their education, what their likelihood of completion is, how far that education will take them after graduation, and at what cost...They deserve to know before they invest thousands of dollars and years of their lives.” In a similar vein, on May 16, 2013, the House Committee on Education and the Workforce passed H.R. 1949, The Improving Postsecondary Education Data for Students Act, which would establish an advisory committee to review existing federal, state, institutional, and private-sector transparency initiatives to determine the information that would be most helpful to both traditional and nontraditional students, including veterans. The advisory committee would be asked to explore what data is needed for students and families who are approaching higher education and how best to collect it.

We can also identify other areas that will be discussed during any conversation on reauthorization by examining the issues raised by the Department of Education as possible topics for negotiated rulemaking in the coming fall: fraud and distance education, gainful employment, and state authorization and distance education. Concerns and issues raised by House and Senate members as evidenced by bills being introduced in 2013 will also serve as a basis of discussion during reauthorization, which include: growing student debt burdens, program reviews and the need for more rigor, prohibition of the use of federal funds for marketing and recruiting, and 90/10 and the possible inclusion of other federal sources of aid.

While many financial aid administrations and members of the higher education community believe that the current regulations and requirements are overly burdensome, there is one clear theme, which is that educational institutions will be facing more requirements and more disclosures for prospective and current student in the coming reauthorization. Additional requirements will only lead to higher costs and consequently higher tuition costs. College affordability as a goal will be more difficult to achieve than ever.
News from Azure College School of Nursing

Humanitarian Trip to Haiti

Twenty one students and staff of Azure College School of Nursing, Miami Gardens, Florida, participated in a humanitarian trip February 2-9 to Haiti. During the week long trip, students and staff had the opportunity to work alongside doctors and nurses in Les Cayes General Hospital, and two privately run hospitals: Lumiere Hospital, and Hospital Saint Boniface, in Fond Des Blancs, south of the capital Port-au-Prince. Azure College students organized and assisted in two community health fairs, where more than 900 patients were helped. Three women and two babies’ lives were saved due to the involvement of Azure College’s Faculty; Dr. Christian Jean Baptiste and Dr. Marilou Strider. Our students were excited and described the trip as a once in a lifetime experience. This successful trip to Haiti provided great cultural awareness, and hands on experience of the clinical aspects of OB/GYN, Pharmacology and Medical Surgical techniques. There will definitely be more trips planned to Haiti and other countries for the students to have a chance of seeing what many would not see at any clinical rotation in the United States. One happy student, Amanda Owens, said of the trip - “Thank you Azure College for this phenomenal experience of working side-by-side with the nurses and doctors on cases I would not have seen in the U.S.”

Highlands County and Azure College Travels to NASA

On March 23, 2013, Azure College in Miami Gardens, Florida, and approximately 120 residents from Highlands County visited the NASA-Kennedy Space Center. For the past several months, Azure College has been planning a trip for local high school seniors to travel to NASA on March 23rd. The high school seniors represented Sebring, Avon Park, and Lake Placid High Schools. These students were chosen to participate in the field trip based on their GPA and school counselor recommendation. Besides the high school seniors, Azure College is also sponsoring 20 students and staff from the Sebring Boys and Girls Club to travel to NASA in the near future.

The President of Azure College, Jhonson Napoleon, states he chose to sponsor the students’ trip to NASA in an effort to “spark” their interest in science and perhaps change their minds about furthering their education.

The NASA trip was fully sponsored by Azure College. While at NASA, the students ate a private lunch with an astronaut to further enhance their experience. Azure College is committed to sponsoring an annual trip for high school seniors in Highlands County.

Azure College School of Nursing in Miami Gardens, Florida, has held institutional accreditation by ABHES since 2011.
A Research report in the spring 2012 edition of the Journal of Interactive Online Learning determined, “Lack of persistence in online education and its’ consequence of attrition, is an identified problem within the United States and internationally” (Hart, 2012, p. 19). The ramifications of this ‘identified problem’ are varied and extensive. It continues to be one of the largest concerns of postsecondary educators; namely retention in online classes. What specifically works for online student retention, is still being debated. The very same “best practices” have been discussed at symposiums, conventions, conferences and workshops for the past decade. What is showing strong promise may require a shift in paradigm to the “next level” beyond generalized, best practices.

A study referenced in an article on Brain Track (2010), emphasizes some of the complexities with “best practices” in an online environment. At Kennesaw State University, Assistant Professor Stacy Campbell, and colleagues, identified a troubling occurrence that is not uncommon to many undergraduate schools in the US. The dropout rates in online courses were higher than dropout rates in the school’s onsite courses. Campbell stressed, “We found the dropout rates to be 15-20 percent higher in the online courses....There are lots of strategies suggested to increase retention, so we thought we would test several to see if they were effective.” The analysis indicated there were no significant differences in the student retention rates. (The Impact of Student Retention Strategies: An Empirical Study, appeared in the International Journal of Management in Education.) Campbell concluded that the results may indicate that the more traditional classroom-based retention strategies used were not as effective in the online environment. She expressed an interest in researching strategies
related to setting expectations and focusing on individual student characteristics.

The study at Kennesaw is but one point in a rapidly growing body of research investigating online student retention. One constant seems to be continually present throughout research, to date: there is not one definitive solution for widespread equalization of online student retention to that of onsite classrooms. Some institutions have been able to acquire equally high online retention rates, but others have not. While the generalized “best practices” approach doesn’t provide specific, measurable activities to implement with ‘at risk’ students; the “best practices” approach does establish a much needed generally optimized learning environment to enhance student opportunities for success.

For students who can, and know how to, take advantage of these opportunities for success, the optimized environment is enough. However, this is only a base level of success in online instruction. The focus is now turning to the next level. In a well-established (best practices), traditional classroom, a talented teacher makes intuitive decisions (on the fly) to individually assist students in maximizing the available optimized learning environment. In this respect, the teacher has an advantage of immediacy to prescribe, and implement, the specific assistance that will help an ‘at risk’ student. In the online classroom, those determinations must be made via the technology in an asynchronous, largely text-based environment.

In some ways, the current research process for online education is not unlike early scientists’ progression from alchemy to chemistry. Our research studies and findings seem to indicate that large ‘macro’ approaches do not adequately address the issues of this new frontier within online instructional technologies. In another study published in the Journal of Interactive Online Learning, the report identifies a need for deeper analyses of “granular level issues such as optimal student interaction patterns” (Kupczynski, Gibson, Ice, Richardson & Challoo, 2011, p.4). Getting into the ‘unseen world’ may be the only way to make the substantive changes we seek.

Since its inception, the majority of online instruction used by formal education has implemented a heavily predominant text-based delivery mode (e.g. weekly class announcements, discussion boards, reading assignments, written assignments, text-based assessments, text-filled slide presentations - with the occasional, ornamental graphic and email messaging). During the past few years, the greatly anticipated and innovative methods of multimedia/ audiovisual demonstrations, 3-D animations, interactive simulations, adaptive learning, scenario-based activities, collaborative technologies and other more robust instructional delivery modes have begun to materialize within the online classroom. Coupled with the correct monitoring and feedback tools, these advancements are greatly assisting the needed improvement from generalized “best practices” to technology for “individualized instruction.” With these new individualized instructional tools comes a deeper level of identifying student need with an immediacy closer to that of the in-class teacher.

Predictive analytics, engagement metrics, adaptive learning, and the like, are no longer just good ideas for the future. These monitoring, feedback and analysis tools are necessary to provide the online instructor with comparable, immediacy indicators that are already possessed by the traditional classroom instructor. Many of the newer, innovative instructional products and services are beginning to provide these ‘next level’ tools to enhance the effectiveness of already adequate online classrooms and talented online teachers, who have maximized the best practices and are ready for the next level.

**What to do, now...**

Moving forward, the schools who have already established known best practices, such as administering a distance education readiness assessment during the admissions process, abundant/efficient communications and feedback, and community building, will find they have best opportunity to take advantage of the ‘next level’ innovations currently emerging in the marketplace. Building individualized instructional technologies in conjunction with granular data analyses will greatly enhance the teachers’ ability to help those students that would otherwise have to drop. These tools are identified in the marketplace with names like predictive analytics, adaptive learning, engagement metrics and many instructional softwares with built-in student performance analytics. Be careful to look for the real thing and not just the buzz words.

**References**


Reverend Al Sharpton Praises Work at Dade Medical College

While touring the Miami Lakes campus of Dade Medical College on Thursday, the Rev. Al Sharpton praised the school for its flexibility and the opportunities it offers minority students. “They’re placing people in the profession and they are reaching people who wouldn’t normally get the education,” the activist and talk show host said.

Along with Sharpton, Dade Medical College CEO Ernesto Perez and Bishop Victor T. Curry shed some light on their initiatives as well. “We are trying to prepare these students for the professional community in a quick and efficient manner without substituting that efficiency with the quality of education that they are receiving,” Perez said. “The goal for the college is to gain access for our students across the healthcare community and to get our students to graduate in a timely manner.” According to a report by the Georgetown University’s Center on Education and the Workforce, healthcare jobs available now will expand by three million positions over the next decade, which will cause the demand for education in those fields to rise.

Because 94 percent of professional occupations will require postsecondary education, it will become difficult for minorities to enter the workforce because of the heavy time commitment required to get these degrees. Dade Medical College is one of the few education institutions in South Florida that offers students open enrollment, morning and night classes and more degree options, making their curriculum flexible enough for the average person to apply. With six campuses all across Florida, Dade Medical College offer degrees in fields such as nursing, massage therapy, medical assistance, patient care technician, psychology and general radiologic technician.

Stressing the need for healthcare in many South Florida communities, Sharpton discussed how important it is to have practitioners who can locally make a difference. “There’s certainly a need for service in terms of people who have the need for healthcare in our communities, but we’re not creating enough practitioners,” Sharpton said. “And that’s what you guys are doing.”

Reprinted from Miami Herald May 30, 2013
http://www.miamiherald.com/2013/05/30/3425049/sharpton-praises-work-at-dade.html#storylink=cpy

ABHES Officers and Executive Committee

At its May meeting, the ABHES commissioners elected the following officers for terms beginning July 1, 2013.

Chair: Florence Tate  
Appointed Seat 4 – Commissioner at Large  
Concord, Massachusetts

Vice Chair: John (Jack) Yena  
Appointed Seat 5 – Public Member  
Chairman of the Board of Trustees and President Emeritus  
Johnson & Wales University, Providence, Rhode Island

Secretary: Randy Nikola  
Elected Seat 4 – Ownership Representative: President, Healing Mountain Massage School, Salt Lake City, Utah

Treasurer: Effie Dubis  
Elected Seat 2 – Administrator in a Healthcare Related Area  
St. Louis College of Health Careers, St. Louis, Missouri

All individuals identified above will serve on the Executive Committee as will Guy Euliano, Past Chair (Elected Seat 6 – Commissioner at Large, Erie Pennsylvania).

Congratulations to all!
While ABHES has dedicated more than 40 years to health education accreditation and has been recognized by the United States Secretary of Education as a private, non-profit, independent accrediting agency since 1968, the Commission continues to be at the forefront of advancing the quality of health education programs throughout the country. ABHES’ stated mission is to enhance the quality of education and training and promote institutional and programmatic accountability through systematic and consistent program evaluation. The key to ABHES’ mission is to assure the quality of the programs it accredits, and assist in the improvement of the programs. This quality-determination is accomplished by rigorous and systematic evaluation based on valid standards.

In accordance with its continuing evaluation of existing standards and accreditation requirements, ABHES is currently reviewing and evaluating the reliability and validity of the Diagnostic Medical Sonography (DMS) and Pharmacy Technician standards as described in Chapter VIII of the Accreditation Manual. Earlier this year ABHES named new members to two committees that coordinate and conduct this continuous review and analysis via the Diagnostic Medical Sonography Advisory Committee and the Pharmacy Technician Advisory Committee.

The focus of the aforementioned advisory committees is to review the accreditation requirements relative to academic rigor and required and essential competencies and evaluate and assess current industry needs, obligations, and applicable prerequisites, including licensure or certification. Each committee has been charged to review the current program-specific standards and requirements as related to the respective academic disciplines to determine reliability, validity, and educational quality and integrity. Subsequent to these reviews, the Commission will consider any recommendations and modifications and will then introduce any proposed changes to these program-specific standards in its prescribed notification processes and, as applicable, include these into the ABHES Accreditation Manual.

The Commission extends its appreciation to its volunteer committee members and thanks all who expressed interest in serving. This partnership enables ABHES to fulfill its stated mission and engender effective standards.

### Annual Reporting Coming Soon

As the annual reporting period comes to an end on June 30, 2013, ABHES is excited to share with its accredited institutions and programs that we are in the process of revamping the annual report online system. ABHES is hoping that these new changes will be a welcomed enhancement.

Accredited institutions and programs will receive an electronic message by no later than Friday, July 26, 2013, regarding the posting of the annual report. The annual report will be due on October 11, 2013, so mark your calendars! This due date includes the submission of the annual sustaining fee. Failure to submit the completed annual report, which includes the sustaining fee, will result in a $1,500 Annual Report delinquency fee (see Appendix I of the Accreditation Manual). Delinquent annual reports require an inordinate amount of extra staff time and expense, including the time and cost necessary to reopen the online reporting template through ABHES’ third party contractor.

Take note of the following changes:

1. Back-up documentation must be submitted on required ABHES forms found on its website at [www.abhes.org/annualreport](http://www.abhes.org/annualreport).
2. If a program enrollment increased by 50% or more, you will be required to complete an addendum prior to submission of the annual report. Last year, letters were sent requesting this information; however, this year the information must be submitted through the on-line annual report.

If you have any questions regarding the annual report or the submission process, please email annualreport@abhes.org and ABHES will be happy to answer any questions that you have.
Where Are They Now?

Since leaving ABHES in May 2008 after six years of service as an Accreditation Specialist and Director of Institutional Compliance, Tony Filipe has remained engrossed in the accreditation process. Between May 2008 and May 2013, Tony worked for Ross Education, LLC, handling all accreditation and licensure matters for the corporate proprietary school group. During Tony's tenure at Ross, the company grew from 13 to 26 ABHES-accredited institutions. While with Ross, Tony and his wife Cheryl welcomed two beautiful sons, Noah Alexander in 2010 and Evan Rainier in 2012.

In May 2013, Tony and his family embarked on a new adventure in Ottawa, Ontario, Canada. Tony recently left Ross Education and joined the Canadian Medical Association (CMA) as a Senior Manager, Conjoint Accreditation Services. Much like ABHES, CMA Conjoint Accreditation is devoted to ensuring high-quality education is delivered to future practitioners in many health science disciplines.

Carol Moneymaker, Executive Director, stated “Tony was and will continue to be a very special part of the ABHES family. Those who worked with Tony are thrilled with his new career choice and his move to Canada, where he attended college and will be closer to family.”

Tony is excited about his new challenge with the CMA and traveling throughout Canada for on-site accreditation visits. Most of all, Tony and Cheryl are looking forward to baby number 3, whose arrival is scheduled for November 2013.

Surgical Technology Program Reminder

Institutions offering Surgical Technology programs accredited by ABHES are reminded that implementation of the new requirements of the 6th Edition Core Curriculum (CCST6e) was required for new classes starting on or after January 1, 2013. The current Core Curriculum for Surgical Technology can be purchased at www.ast.org/store.

It is also important to remember that any changes to the program are to be reported to ABHES in accordance with III.B., Institutional Changes, of the Accreditation Manual. Applications can be found at www.abhes.org/forms.
Certification Opportunities at Every Stage

Dental assistants at every stage of their career path will soon have certification options available, thanks to the newest certification programs from the Dental Assisting National Board, Inc. (DANB).

Most recently, DANB introduced the Certified Restorative Functions Dental Assistant (CRFDA) certification program, which is made up of six component exams: Anatomy, Morphology and Physiology (AMP); Impressions (IM); Temporaries (TMP); Isolation (IS); Sealants (SE); and Restorative Functions (RF). These component exams cover the restorative functions that dental assistants often perform as they advance in their career.

There are no eligibility requirements for the AMP, IM, TMP, IS or SE component exams; however, there are eligibility requirements for the RF component exam and for earning and maintaining CRFDA certification.

Many dental assisting educators and program directors said they decided to earn DANB’s CRFDA certification to demonstrate their commitment to their profession, set an example for their students, and bring value to their dental assisting programs.

“As a program director and instructor, I feel it is my responsibility to have the highest level of certification possible,” said Melissa Gacek, CDA, CPFDA, CRFDA, the dental assisting program director at Lincoln Technical Institute, which is accredited by the Accrediting Bureau of Health Education Schools and the Commission on Dental Accreditation.

This is an exciting time for dental assistants, and many states are expanding the duties that assistants are allowed to perform. That’s why DANB also offers a certification for preventive functions.

Introduced in 2011, DANB’s Certified Preventive Functions Dental Assistant (CPFDA) certification is made up of four component exams: Coronal Polish (CP), Sealants (SE), Topical Anesthetic (TA) and Topical Fluoride (TF). There are no prerequisites to take the individual component exams, but dental assistants must meet requirements to apply for the CPFDA certification.

Karen Johnson, CDA, CPFDA, CRFDA, said after 35 years as a dental assistant, she was ready for a new challenge; DANB’s CPFDA certification was the professional development opportunity she was looking for. “I was confident that I had the clinical abilities to move forward, but the knowledge that I gained during the study process was well worth the time invested,” she stated.

In addition to these latest certifications, DANB’s Certified Dental Assistant (CDA) and Certified Orthodontic Assistant (COA) certifications continue to be career milestones that thousands of dental assistants work toward each year. DANB’s CDA and COA certifications cover the important duties that dental assistants and orthodontic assistants perform every day, such as chairside assisting, infection control and dental radiography.

“Being DANB certified was a very big deal to me and my first goal as dental assistant,” said Wendy Wakefield, CDA, CRFDA. “I am very passionate about my dental career, and DANB certification was the first stepping stone toward greatness.”

However, DANB also recognizes the important need for a certification program for dental assisting students who may have just graduated from a vocational-technical program. To meet this growing demand, DANB is developing a new entry level certification, called Certified Entry Level Dental Assistant (CELDA), which will be available next year.

“DANB continues to develop exams and certifications to support dental assistants and to fulfill DANB’s mission of public protection,” said DANB Executive Director Cindy Durley, M.Ed., MBA. “DANB believes that certification can help elevate the dental assisting profession. The new certification programs, together with the existing exams and certification programs, form DANB’s vision of the dental assisting career ladder.”

Continued on page 19
NEWS FROM AMT

The American Medical Technologists continues to work towards making the certification process easy and responsive to the needs of educators and students. Below are just a few of the improvements that our schools and applicants can expect:

• **STATE LEVEL ACTIVITY:** AMT frequently works with ABHES schools at the state level when legislative or regulatory initiatives emerge that impact allied health programs. For example, AMT has over the past several months actively engaged with the State of Washington Department of Health regarding implementation of new legislation requiring medical assistants who wish to engage in the full scope of MA practice to have passed an approved certification examination. AMT’s exam is among those being recognized for this purpose. AMT twice publicly testified at Washington Department of Health hearings and also attended the annual meeting of the Northwest Career Colleges Federation to provide information about our medical assistant certification examination.

• **ONLINE APPLICATIONS:** Beginning this summer, AMT will be introducing online applications for its certification programs. Students will be able to create a profile and submit their application directly to AMT. Many documents can be uploaded as well. Once they apply, students are able to check their status online so that they can more easily track the approval process.

• **SCHOOL RECOGNITION PROGRAM:** In 2012, AMT began a new recognition program for its school partners. Once recognized, each school receives a display certificate and a full Public Relations package to assist with promoting the partnership to others. The school also receives online access to outcomes reports described below as well as regular communications from AMT.

• **OUTCOMES REPORTS:** AMT has developed helpful reports that compare aggregate examinee performance for school graduates against a national benchmark. Detailed and summary statistics are available for both total score and content sub-areas of the examination. Program administrators report that this type of information is often helpful in identifying programmatic strengths and weaknesses.

• **STUDENT MEMBERSHIP:** In order to promote early student involvement, AMT is making its student membership FREE. The membership includes access to the student membership online forum. The student pin is sold separately for $5 or in bulk, purchased by a school official.

• **PRACTICE EXAMS:** Now available – a new practice exam for medical assistants. This practice exam is online and is full-length to closely mimic the actual testing environment. For $30 ($25 for student members), applicants can test twice, each time with a new randomized set of questions. In addition, incorrect answers are given explanations and references to help the student re-learn the material. What a great confidence booster! School officials can receive a discount for purchasing the exams in bulk.

• **FREE WEBINAR:** Schools and students have access to a FREE webinar entitled “AMT Certification Process” that outlines the benefits of certification and details the steps students go through when applying for certification and sitting for the exam. An archived version can be shown to students at any time. Also browse through the other webinars that might be of interest to your students.

• **POSTERS:** Brand new posters are available that highlight each certification specialty! Place them all around your campus to promote your programs.

More information and links can be found on the AMT website: www.americanmedtech.org, Schools and Students tab, School Resources page.
The Accrediting Bureau of Health Education Schools Schedule of Events

July 2013 through December 2013

THURSDAY, JULY 4, 2013
⊙ Observance of Independence Day (Office Closed)

SUNDAY-TUESDAY, JULY 14-16, 2013
☞ Commission Meeting (McLean, Virginia)

FRIDAY, JULY 26, 2013
☞ Annual Report Posting Date

AUGUST 1, 2013
☞ Second Travel Cycle Begins

MONDAY, SEPTEMBER 2, 2013
⊙ Labor Day (Office Closed)

THURSDAY, SEPTEMBER 19, 2013
☞ 9am to 5pm - Programmatic Accreditation Workshop* (Atlanta, GA)

FRIDAY, SEPTEMBER 20, 2013
☞ 9am to 5pm - Institutional Accreditation Workshop* (Atlanta, GA)

MONDAY, OCTOBER 7, 2013
The following is being held just prior to the CAPPs Conference:
☞ 9am to 5pm - Programmatic Accreditation Workshop* (Pasadena, CA)

TUESDAY, OCTOBER 8, 2013
The following is being held just prior to the CAPPs Conference:
☞ 9am to 5pm - Institutional Accreditation Workshop* (Pasadena, CA)

FRIDAY, OCTOBER 11, 2013
☞ Annual Report Due Date

MONDAY, OCTOBER 14, 2013
⊙ Columbus Day (Office Closed)

NOVEMBER 1, 2013
☞ Self Evaluation Report (SER) Deadline

FRIDAY-SUNDAY, NOVEMBER 1-3, 2013
☞ Standards Review Committee Meeting (Location TBD)

NOVEMBER 10, 2013
☞ Second Travel Cycle Ends

MONDAY, NOVEMBER 11, 2013
⊙ Veterans Day (Office Closed)

MONDAY – WEDNESDAY, NOVEMBER 18-20, 2013
⊙ Annual Report Committee Meeting (LOCATION TBD)

THURSDAY-FRIDAY, NOVEMBER 28-29, 2013
⊙ Thanksgiving Holiday (Office Closed)

MONDAY-FRIDAY, DECEMBER 9-13, 2013
☞ Preliminary Review Committee Meeting (Falls Church, VA)

MONDAY-FRIDAY, DECEMBER 23-27, 2013
⊙ Holiday Season (Office Closed)

*Register for workshops online at https://www.abhes.org/workshop_registration
American Career College Celebrates Opening of Long Beach Campus and Gives Back to the Community

Earlier this year, American Career College (ACC), a leader in health care education held a new campus grand opening and took part in several community events across the southern California area. First, ACC held its second annual Teddy Bear Drive, which involved the collection and distribution of teddy bears to children at several local hospitals. ACC was also an active exhibitor at this year’s Toyota Grand Prix of Long Beach, where ACC Massage Therapy students gave massages in return for donations to Shriners Hospitals for Children Los Angeles. Most recently, ACC celebrated the grand opening of its fourth campus located in downtown Long Beach.

In February, members of the American Career College community collected more than 1,000 teddy bears in their second annual drive in honor of Valentine’s Day. The first 500 teddy bears helped brighten the day of young patients at Miller Children’s Hospital Long Beach. The teddy bear collection drive started February 12, and delivery of the stuffed animals began February 28. “We’re very proud that we’ve collected over 1,000 teddy bears this year and we are ready to deliver them to local hospitals,” said ACC President Tom McNamara.

ACC proudly participated as a main exhibitor in festivities surrounding the 2013 Toyota Grand Prix of Long Beach on April 19-21, 2013. ACC’s Massage Therapy students offered massages to race fans and passersby in return for donations to Shriners Hospitals for Children Los Angeles. The public’s donations were matched by CEO David Pyle, who remains committed to entwining American Career College into the communities it serves. The initiative raised approximately $11,400 which was presented to Kelly Chang, Director of Community Outreach and Tawny Valencia, Development Assistant of Shriners Hospitals for Children Los Angeles.

On April 25, 2013, American Career College opened the doors to its fourth campus in Long Beach,
CA. The ACC Long Beach campus was constructed in the 1930s and was known to locals as the Arts Building. It is located in the heart of downtown Long Beach, which is sprinkled with unique restaurants and next to popular attractions, such as the Pike Mall, the Aquarium of the Pacific, and the Queen Mary. ACC unveiled its new facilities, welcoming dignitaries, students and the general public to an evening filled with camaraderie, charity and goodwill. Attendees included Robert Garcia, Vice Mayor of Long Beach, representatives from several area health care organizations and community partners, including representatives from Providence Little Company, Integrated Management & Diagnostic Services, The Atticus Group, Pacific Alliance Medical Center, and Los Alamitos Medical Center. David Pyle, Founder and CEO of ACC, looks forward to a long-lasting relationship between the school and its new Long Beach home: “For over 35 years, we have woven ourselves into the fabric of the Southern California health care community, and we embrace the opportunity to open our doors to the Long Beach community.”

American Career College continues to partner with various health care organizations and hospitals, and remains involved in many philanthropic and charitable efforts. President Tom McNamara states: “Giving back to the community is one of our core values. As we train professionals to work in the health care field, we want to lead them by example, supporting the institutions that are dedicated to saving lives and improving the health of our community.”

American Career College, Los Angeles, California, has held institutional accreditation by ABHES since 1983, with three additional campuses, also in California, following over the years.

Surgical Technology and Surgical Assisting News

Dennis Stover, President, Meridian Institute of Surgical Assisting was re-elected as President of the Association of Surgical Assistants (ASA), a surgical assisting membership organization. Mr. Stover has served ABHES over the years as both an evaluator and appeal panel member.

The ASA is a professional membership organization devoted to non-physician surgical first assistants throughout the United States. Their mission is to unite professionals from diverse backgrounds, including Certified Surgical First Assistants (CSFAs), Certified Surgical Assistants (CSAs), and Surgical Assistants-Certified (SA-Cs), and promote a cooperative environment in which the advancement of the field of surgical first assisting can be realized.

Roy Zacharias, Dean, Meridian Institute of Surgical Assisting in Nashville, Tennessee, and member of ABHES’ Programmatic Accreditation Committee for Surgical Technology (PAC-ST), was recently elected president of the Association of Surgical Technology (AST).

The AST is a professional organization for surgical technologists and surgical assistants. Established in 1969 by members of the American College of Surgeons (ACS), the American Hospital Association (AHA), and the Association of periOperative Registered Nurses (AORN), AST’s primary purpose is to ensure that surgical technologists and surgical assistants have the knowledge and skills to administer patient care of the highest quality.

ABHES congratulates both Mr. Stover and Mr. Zacharias on their achievements and looks forward to continuing the professional relationships it has developed over the years with them!

Meridian Institute of Surgical Assisting, Nashville, Tennessee, has held institutional accreditation by ABHES since 2009.

“Certification Opportunities”, continued from pg. 15

DANB has been testing and certifying dental assistants for more than 60 years. DANB is recognized by the American Dental Association as the national certification board for dental assistants. Currently, there are more than 35,000 DANB certificants nationwide, and DANB certifications and certificates of knowledge-based competency are recognized or required in 38 states, the District of Columbia, the U.S. Air Force and the Department of Veterans Affairs.

DANB’s latest and longstanding certifications reflect the growth and exciting changes happening in the field of dental assisting — and provide a career ladder for those who plan to make dental assisting a lifelong profession.

ABHES-accredited institutions offering a dental assisting program must comply with ABHES requirements outlined in Chapter VIII, Program Evaluation Standards for Dental Assisting I and Dental Assisting II. Institutions may apply for programmatic accreditation through the Commission on Accreditation (CODA) which enables graduates to be eligible to sit for the DANB certification exam.
Unpaid Internship Dilemma

By RJ Nikola,
Current ABHES
Commissioner

Vocational programs taught at post-secondary schools often contain either an internship or externship as part of the curriculum to offer students live on-the-job experiences prior to graduation and eventual employment. The terms internship and externship seem to be used interchangeably regardless of whether these student activities take place internally at a campus facility or externally off campus in conjunction with local, regional, or nationally recognized companies. And, for institutions and/or companies providing this valuable learning experience outside the classroom, there may be hidden complications that could affect your bottom line.

When the economy takes a prolonged down turn, governments tend to get creative at finding ways to generate income for themselves as taxable revenues decline with less companies doing business and more people on unemployment: i.e., less taxes incoming while more government funds are outgoing. One of those creative ways originates with the Department of Labor (DOL) and concerns what constitutes an internship and who is classified as a paid employee or not.

The DOL uses six criteria in determining what constitutes an unpaid intern experience. According to them, all six criteria must be met for a company (whether the company means the institution in regards to providing internal experiences OR the private company providing extern site experiences) to consider whether the trainee is unpaid or an employee.

1. The training, even though it includes actual operation of the facilities of the employer, is similar to that which would be given in a vocational school.

At first glance, this might seem easy to comply with given a vocational school creates or has an internal experience for students. But, as most schools/programs secure externship sites off campus at private companies, it is important the extern experience closely resembles the curriculum and training albeit in a live work setting. This may be done by having the externship a required undergraduate course clearly defined in the school catalog with an established syllabus/lesson plan where supervisors meet instructor qualifications.

In the article “The Truth About Unpaid Internships” author and labor lawyer Jonathon Driggs states, “...it is clear the DOL has set a very high standard for unpaid internships – a standard that is rarely met in real life situations. ... practically speaking, what this means is that the only thing the intern can really do is observe.” He goes on, “Because of the difficult economy, the DOL is increasing the level of scrutiny on unpaid internships (their view is that they take paying jobs out of the marketplace).” (see criterion #3 for further clarification)

2. The training is for the benefit of the trainee.

In a letter dated May 17, 2004 the Fair Labor Standards Team of the DOL stated, “Whether student interns are employees under the FLSA (Fair Labor Standards Act) will depend upon all the circumstances surrounding their activities. For example, where certain work activities are performed by students that are simply an extension of the academic programs, we often would not assert that an employer-employee relationship exists for purposes of the FLSA.” A word of caution should be noted here, which is there can be no benefit to the employer that outweighs the benefit to the intern (see criterion #4 for further clarification).

3. Trainees don’t displace employees, but work under observation.

In Fact Sheet 71 produced by the US Department of Labor’s Wage and Hour Division, it states, “If an employer uses interns as substitutes for regular workers or to augment its existing workforce during specific time periods, these interns should be paid minimum wage and overtime compensation for hours worked over forty in a workweek. If the employer would have hired additional employees or required existing staff to work additional hours had the interns not performed the work, then the interns will be viewed as employees and entitled compensation under the FLSA. Conversely, if the employer is providing job shadowing opportunities that allow an intern to learn certain functions under the close and constant supervision of regular employees, but the intern performs no or minimal work, the activity is more likely to be viewed as a bona fide education experience. On the other hand, if the intern

THE DEPARTMENT OF LABOR USES SIX CRITERIA TO DETERMINE WHAT CONSTITUTES AN INTERNSHIP AND WHO IS CLASSIFIED AS A PAID EMPLOYEE
receives the same level of supervision as the employer’s regular workforce, this would suggest an employment relationship, rather than training.”

The implication in the above statement is a trainee can be classified as an intern upon the condition they only observe or perform minimal work under close observation and constant supervision of regular employees. The thought is ludicrous in an education environment. The combination of classroom knowledge and skill sets necessary for employment in vocational fields can only be attained by doing and internships allow this doing in live on-the-job training. As an example, merely watching how to draw blood from a patient does not prepare someone or give them the skills to actually do it. After all, would anyone be willing to have open-heart surgery from a medical school graduate that had only observed a surgery or two, but was never allowed to perform numerous surgeries or assist in surgeries under the supervision of a skilled surgeon during their residency (internship)? Of course, not. Yet, this seems to be the rationale within the DOL.

4. Employer derives no immediate advantage from activities.

Federal Code 29, Part 520, Subpart C defines Bona fide vocational training program as, “a program authorized and approved by a state board of vocational education or other recognized educational body that provides for part-time employment training which may be scheduled for a part of the work day or workweek, for alternating weeks or for other limited periods during the year, supplemented by and integrated with a definitely organized plan of instruction designed to teach technical knowledge and related industrial information given as a regular part of the student learner’s course by an accredited school, college, or university.”

Under this definition, most accredited institutions or programs of vocational training should be covered, but possibly not externship sites off campus run by private companies. The DOL’s interpretation of the criterion #4 is that the employer that provides the training can derive no immediate advantage (usually understood as monetary income) from the activities of the trainees, and on occasion the employer’s operations may actually be impeded by said activities. So, if the educational institution offering a vocational program charges tuition for the intern/extern coursework or if they receive all or a portion of the proceeds from the intern/extern experience, are they deriving immediate advantage from those activities? And, if the on-the-job intern activities are being taken care of by an independent company off-site that charges for those activities, are they deriving advantage from the intern’s activities? Schools may want to receive legal consultation from a firm specializing in labor law to ascertain what constitutes compliance.

5. Trainees are not necessarily entitled to a job at the completion of the training period.

It is noted that careful consideration be made as to whether the internship meets the following qualifications: a) the internship needs to be of a fixed duration established prior to the outset of the internship, b) unpaid internships are not to be used by the employer as a trial period for individuals seeking employment at the conclusion of the internship, and c) if an intern is placed with the employer for a trial period with the expectation that he or she will then be hired on a permanent basis, then the individual would be considered an employee under the FLSA.

6. Trainees understand they’re not entitled to pay for clinic.

To be in compliance with criterion #6, it is best to not only have it explained in the school catalog under course description, but also in an internship handbook, during internship orientation, and lastly with a signed internship agreement. If a school is going to take these measures to comply with criterion #6, it is probably best to make statements that accurately reflect compliance with criteria 2, 3, and 5; that is (2) training is for the sole benefit of the student, (3) trainees do not displace existing employees, but perform tasks that hone their profession’s skill sets; not the skill sets of just one employer, and (5) Trainees are not entitled to a job with the employer at the completion of the training period.

Conclusion

While it may be challenging to come into full compliance with the Department of Labor’s criteria for unpaid internships, institutions are advised to develop proactive strategies to ensure successful clinical opportunities for students. Such strategies will afford constructive learning experiences for students while working toward compliance for schools and extern companies alike.

Mr. Nikola has been a massage therapist, educator and author for over twenty years. He owns Healing Mountain Massage School with two campuses in Utah. He currently serves as a Commissioner (member of the Board of Trustees) in a volunteer capacity for ABHES – the Accrediting Bureau of Health Education Schools in suburban Washington, DC
MEMORIES FROM ABHES’ 10th ANNUAL CONFERENCE, SAN DIEGO, CA!
Save the Date!

11th Annual National Conference on Allied Health Education

Wednesday through Friday, February 26-28, 2014
Gaylord Opryland Hotel and Convention Center
Nashville, Tennessee

Details Coming Soon!
ABHES COMMISSIONERS AND STAFF

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Effie Dubis
Elected Seat 2 – Administrator in a Healthcare Related Area
St. Louis College of Health Careers, St. Louis, Missouri

Jim Buffington
Elected Seat 3 – Ownership Representative
President, Career Networks Institute, Costa Mesa, California

Randy Nikola
Elected Seat 4 – Ownership Representative
President, Healing Mountain Massage School, Salt Lake City, Utah

Nancy Last
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Guy Euliano
Elected Seat 6 – Commissioner at Large
Erie, Pennsylvania

Elected Seat 7 – Commissioner at Large (Vacant)

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Appointed Seat 5 – Public Member
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