



ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS | ABHES

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## ABHES BULLETIN

To: ABHES-Accredited Institutions and Programs  
Recognized Accrediting Agencies  
State Departments of Education  
U.S. Department of Education  
Interested Parties

From: India Y. Tips, Executive Director

Date: October 1, 2021

Subject: Proposed Revisions to ABHES *Accreditation Manual* – Call for Comment

The Accrediting Bureau of Health Education Schools (ABHES) regularly reviews its accreditation policies, procedures, and standards and invites your comments regarding the proposed revisions to the noted sections of the *Accreditation Manual*. These revisions stem from the work of a taskforce on consortium agreements and third-party contracts and the Commission's discussion of compensation during clinical experiences.

In the attached proposed revisions, note that new language is underlined and deleted language is ~~struck~~. The revisions are related to clarifying the types of agreements and contracts ABHES requires members to submit for approval prior to implementation as well as eliminating the compensation restriction in Chapter VIII - ST.

Upon careful review of the proposed revisions, please complete the Call for Comment Survey and submit any comments or recommendations for Commission consideration using the following link:

### **Call for Comment on Proposed Revisions to the Accreditation Manual – October 2021**

Upon receipt and review of the results of the Call for Comment, the Commission may adopt the revision as proposed, adopt the revision with further changes, defer action for additional consideration, or reject the proposed revision. For adopted revisions, ABHES will establish an effective date and announce the revisions prior to that date.

**Comments will be considered at the January 2022 Commission meeting. Complete the survey to submit your comments no later than Friday, October 29, 2021.**

Thank you in advance for your participation.

## CHAPTER I – GENERAL INFORMATION

### SECTION B – Policies Affecting Institutions and Programs

#### Subsection 7 – ~~Third party contracts, transfer credits, articulation, and consortium~~ Education provider agreements

##### *~~Third Party Contracts~~*

~~Third party contracts~~ Education provider agreements refer to situations in which an ABHES-accredited institution or program, referred to as the home institution or program, arranges to have some portion of its services-education program curriculum provided/delivered by another party, or host. In these cases, the services provided, including any coursework provided is- are treated as if it/they had been provided directly by the home institution or program. In all cases, home institutions and programs should provide, to prospective and enrolled students, clear disclosure of the nature of their educational delivery agreements.

~~An institution or program may contract with a third party to provide a portion of an educational program or to provide other management or services required by ABHES. Third party contracts providing~~ Agreements to provide student instruction must be approved by ABHES prior to implementation. The institution or program seeking approval must submit the following: (1) a proposal that identifies the third party and the services to be provided under contract; (2) a copy of the proposed contract; and (3) a statement indicating that the institution or program retains responsibility for compliance with all ABHES requirements.

~~Please note that for degree programs, no more than 49 percent of program credits or the recognized clock hour equivalent may be provided by any third party. In addition, a minimum of 25 percent of the coursework provided by the institution or program accredited by ABHES must consist of core courses.~~

##### *~~Transfer Credits~~*

~~Every institution must have transfer of credit policies that are publicly disclosed in accordance with 34 CFR §668.43(a) (11) of the Higher Education Act (HEA) and include a statement of the criteria established by the institution regarding transfer of credit earned at another institution of higher education. Institutions are encouraged to accept transfer credits to promote academic mobility and to avoid requiring students to unnecessarily repeat prior equivalent coursework.~~

~~An institution or program may accept credits or clock hours earned at another institution accredited by an agency recognized by the United States Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA) to satisfy specific requirements for completion of a program. An institution or program may accept credits or clock hours earned at another institution that is not located in the United States or its territories if the specific foreign education is evaluated by an agency which attests to the qualitative and quantitative equivalency of the foreign education and the specific course or courses for which transfer credit is to be awarded. The institution must use the credential evaluation services of an agency that has published standards for membership, affiliations to U.S.-based international higher education associations, and are frequently linked to and used by federal agencies, state agencies, educational institutions, and employers (e.g., NACES and AICE).~~

~~The institution or program must demonstrate that it has evaluated the coursework accepted for transfer in accordance with its published policies, and the basis for a conclusion that it is equivalent to the coursework for which it substitutes and meets all ABHES requirements, including competency achievement.~~

## Articulation Agreements and Consortium Agreements

~~As an alternative to case-by-case consideration of requests for transfer of credit, an institution or program may enter in a consortium or articulation agreement with an institution accredited by an agency recognized by the United States Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA). Articulation and Consortium agreements are encouraged to provide opportunities for students' academic mobility.~~

~~An articulation agreement formalizes transfer of credits under certain specific conditions stated in the agreement and provides for acceptance of specific credits earned at the other institution to satisfy specific requirements for completion of a program. Credits accepted from another institution pursuant to such an agreement are transfer credits and must meet all provisions regarding transfer credits. The receiving institution or program must demonstrate the basis for concluding that each transfer credit accepted is equivalent to the credit that it replaces in terms of the knowledge and skill the credit represents in the curriculum design.~~

~~Consortium or contractual agreements are arranged between two (2) or more institutions or programs accredited by ABHES or another agency recognized by the United State Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA), eligible schools in order that a student continues to receive Federal Student Aid while studying at an institution different than the student's designated school. Under a consortium or contractual agreement, the degree or certificate granting school accepts the credits taken at another institution(s), as if they were offered by the student's designated-home institution. The assumption is that the institution has found another school or organization's academic standards to be the equivalent to its own level of instruction. All schools and campuses involved in the sharing of courses must have any required approvals (by an accreditor recognized by the USDE or CHEA and state authorizing agencies) to offer the courses which will be shared. If a host institution or program is offering courses via distance education delivery, it should also have all appropriate distance education approvals.~~

### Contracting Agreements

~~Distinct from Consortium Agreements, a "contracted agreement" is the execution of a contract under which an institution, organization, or program not certified to participate in the Title IV, HEA programs offers up to 49% of the accredited institution's educational program. The home institution must provide clear evidence of the capacity of the partner to provide the education and evidence that the program complies with all ABHES standards. This provision is not intended to apply to clinical affiliation agreements.~~

### Subsection 8 – Transfer of credit and articulation agreements

Every institution must have transfer of credit policies that are publicly disclosed in accordance with 34 CFR§668.43(a) (11) of the Higher Education Act (HEA) and include a statement of the criteria established by the institution regarding transfer of credit earned at another institution of higher education. Institutions are encouraged to accept transfer credits to promote academic mobility and to avoid requiring students to unnecessarily repeat prior equivalent coursework.

An institution or program may accept credits or clock hours earned at another institution accredited by an agency recognized by the United States Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA) to satisfy specific requirements for completion of a program. An institution or program may accept credits or clock hours earned at another institution that is not located in the United States or its territories if the specific foreign education is evaluated by an agency which attests to the qualitative and quantitative equivalency of the foreign education and the specific course or courses for which transfer credit is to be awarded. The institution must use the credential evaluation services of an agency that has published standards for membership, affiliations to U.S. based international higher education associations, and are frequently linked to and used by federal agencies, state agencies, educational institutions, and employers (e.g., NACES and AICE).

**Commented [KC1]:** Though struck here, a new section was created below related to transfer of credit and articulation agreements (see new subsection 8 for edits to this language).

The institution or program must demonstrate that it has evaluated the coursework accepted for transfer in accordance with its published policies, and the basis for a conclusion that it is equivalent to the coursework for which it substitutes and meets all ABHES requirements, including competency achievement.

### Articulation Agreements

As an alternative to case-by-case consideration of requests for transfer of credit, an institution or program may enter into ~~an consortium or~~ articulation agreement with an institution accredited by an agency recognized by the United States Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA). Articulation ~~and Consortium~~ agreements are encouraged to provide opportunities for students' academic mobility.

An articulation agreement formalizes transfer of credits under certain specific conditions stated in the agreement and provides for acceptance of specific credits earned at the other institution to satisfy specific requirements for completion of a program. Credits accepted from another institution pursuant to such an agreement are transfer credits and must meet all provisions regarding transfer credits. The receiving institution or program must demonstrate the basis for concluding that each transfer credit accepted is equivalent to the credit that it replaces in terms of the knowledge and skill the credit represents in the curriculum design.

### **Subsection 82 – Minimum completion requirement**

At a minimum, 25 percent of the credits or the recognized clock-hour equivalent required for completion of a program must be earned through coursework offered by and completed at the institution or program granting the credential.

## **CHAPTER III – GENERAL PROCEDURES** (APPLIES TO INSTITUTIONS AND PROGRAMS)

### **SECTION B – Institutional Changes**

#### **Subsection 1 – Non-substantive changes requiring approval**

The following changes must be submitted to ABHES for approval prior to implementation on the appropriate applications ([www.abhes.org](http://www.abhes.org)) for consideration by staff. The Commission may become involved in the consideration if necessary.

(\* denotes a site visit required)

- vii. Addition or change of consortium agreement(s) ~~or third party contract(s)~~.
- ix. Execution of a contract under which an institution or organization not certified to participate in the Title IV, HEA programs offers up to 25 percent of one or more of the accredited institution's educational programs.

#### **Subsection 2 – Substantive changes requiring approval**

An accredited institution or program must notify ABHES of every substantive change as defined by this section by completing the appropriate substantive change application.

Substantive change as defined by this section will not be included within an existing grant of accreditation to an institution or program until the effective date of approval of the specific change by the ABHES Commission or ABHES senior staff, as delegated by the Commission. The effective date of approval will not be retroactive, but rather will be the date of the notification letter from ABHES to the institution or program. The only exception to this policy is that ABHES may designate the date of a change in ownership as the effective date of its approval of the substantive change if the Commission action is made within 30 days of the change in ownership.

The ABHES Substantive Change Committee acts on applications for substantive change that occur within a grant of accreditation. The committee will grant approval when it determines that the institution or program continues to meet all accreditation requirements. Approval will not be granted for any substantive change that adversely affects the capacity of the institution to continue to meet accreditation requirements.

In order for a substantive change to be considered for approval and inclusion in a grant of accreditation, ABHES requires submission of the appropriate application, required documentation, and fee. Visit [www.abhes.org](http://www.abhes.org) to access applicable applications. Each application identifies the application requirements.

ABHES will not review, consider, or process substantive changes while the institution is under a probationary equivalent action directive, unless the institution demonstrates that the substantive change is likely to resolve the probationary equivalent directive. An institution's or program's request for acceptance of the application must include justification for the change and its effect on the institution's or program's operation.

**Substantive changes that must be approved prior to inclusion in a grant of accreditation are the following:**

(\* denotes a site visit required)

(+ denotes substantive changes that may be approved by ABHES senior staff, as delegated by the Commission)

viii. Execution of a contract under which another organization or institution not certified to participate in Title IV, HEA programs offers more than 25 percent and no more than 49 percent of one or more of the accredited institution's educational programs.

- a. ABHES senior staff either approves or denies the contract (or written agreement) within 90 days after receiving a complete application. If ABHES senior staff determine this substantive change requires review by the Commission, an approval or denial is provided within 180 days.

**Subsection 13 – Addition or change of consortium agreement**

The home institution or program seeking approval must submit an application that includes (1) a list of all parties involved in the agreement and the services to be provided, (2) a copy of the proposed agreement, and (3) a statement indicating that the home institution or program retains responsibility for compliance with all ABHES requirements.

## CHAPTER VII – ST EVALUATION STANDARDS FOR SURGICAL TECHNOLOGY

### SECTION A – Curriculum, Competencies, and External and/or Internal Clinical Experience

*ST.A.2. A clinical experience is required for completion of the program.*

The following is considered in choosing, placing, and maintaining clinical experience site affiliations:

#### (a) Assignment

Clinical sites include placement at a facility that performs various types of surgical procedures that will expose the student to the necessary skills required for entry-level practice in the profession. Placements may include limited time at out-patient surgical facilities.

Students may not replace existing staff ~~or be compensated~~ while participating in clinical experiences and this fact is made known to the student. ~~The student is clearly in addition to the team and not a substitution.~~

In all cases, the clinical site used is properly licensed and regulated.

#### (b) Activities

*(no additional requirements beyond Chapter V)*

#### (c) Supervision

An individual employed by the institution who meets the minimum qualifications of program faculty member is responsible for documenting routine on-site visits and weekly interaction, with both the student and facility, to evidence oversight and evaluation of student performance while at the clinical site.

#### (d) Requirements for Completion

Clinical assignments must allow the student to fulfill all of the requirements set forth in the current Core Curriculum. Simulation may not be substituted for the surgical cases outlined in the Core Curriculum required during clinical experiences.

Simulation may be substituted for up to 20 percent of the total required clinical hours in exceptional circumstances that make it impossible to complete total clinical hours (e.g., government regulations, regional or national disasters). Program that utilize simulated clinical experiences must maintain documentation demonstrating the need for simulation as well as how the program incorporated program management, applicable institutional administrators and management, and program advisory board input into its decision-making process.

**Commented [KC1]:** This is already covered in V.B.4.b., which applies to all programs, and does not need to be duplicated here.