

## **POLICY AND PROCEDURE FOR PROCESSING COMPLAINTS INITIATED AGAINST AAHEA ACCREDITED INSTITUTIONS**

**PURPOSE:** The purpose of this policy document is to establish a standard method by which complaints involving AAHEA standards, policies, and procedures about a member institution or an institution whose submitted application for initial accreditation remains active may be processed to conclusion.

**POLICY REQUIREMENTS:** Accreditation is a partnership for quality in which an institution must meet established standards of educational quality. Toward that end, AAHEA accredited institutions are responsible for maintaining ongoing compliance with the AAHEA Standards for Accreditation and must inform participants of their right to communicate with AAHEA regarding complaints relative to noncompliance with those standards. Accordingly, accredited institutions will:

1. Maintain a reasonable internal grievance policy to receive and resolve complaints, and disclose said policy in written form to all students at time of enrollment.
2. Notify AAHEA in writing within ten (**10**) days of any action or complaint filed against it by a governmental agency having regulatory authority over it, furnishing with the notification a copy of the items filed against it. (Refer to AAHEA Document #4 - Policy on Adverse Actions by Other Agencies.)
3. Inform participants of their right to contact AAHEA with a complaint; make available AAHEA Document #6. - Notice to Students: Complaint Procedure in a readily accessible, prominent location at the school; and furnish participants the address and phone number of AAHEA upon request. All AAHEA Accredited institutions shall have a policy in place to handle any and all student complaints.

### **PROCEDURES FOR PROCESSING A COMPLAINT:**

An accreditation staff member is designated as the Chair of the Complaint Review Committee, who is responsible for processing complaints. The Complaint Review Committee is comprised of the Executive Director and accreditation staff. This body can collectively resolve complaints by vote, as authorized by the Executive Director. Copies of complaints and all related documents will be placed in the institution's file upon resolution.

Complaints may be written or oral, from an identifiable source or anonymous, from a participant or non-participant, or initiated by AAHEA, and must relate to an AAHEA standard, policy, or procedure. Every complaint is considered serious and will be handled expeditiously.

Oral complaints will be routed to the Chair of the Complaint Review Committee, or other designated member of the accreditation staff, who will attempt to obtain the following: 1) name, address, and telephone number of the person calling; 2) name and location of the institution concerned; 3) caller's status with the institution; 4) names of individuals at the institution involved in the complaint; 5) details of the complaint; and 6) what was done to resolve the complaint prior to calling. This information will be logged and dated. The complainant will be directed to furnish a written complaint within ten (10) days and will be informed that failure to do so may result in the determination that the complaint is not bona fide and, therefore, will not be processed further. A verbal complaint may be processed without

Subsequent written notification if it is determined to be one with urgency, as defined below, upon conferral with the Executive Director. Anonymity will be honored for callers who do not wish to be identified; however, they must still furnish a complaint in writing per the above policy.

Complaints received in writing will be date stamped and routed to the Chair of the Complaint Review Committee for an initial determination of credibility and urgency and may subsequently be reviewed with the Executive Director and/or the Complaint Review Committee for further consideration.

Anonymous complaints will be processed according to the policy and procedures outlined herein, and specific requests for anonymity by an identifiable source shall be honored by all reasonable means. Complaints submitted anonymously must include substantive representation of all allegations relating to AAHEA standards, policies, and procedures; otherwise, such complaints lacking sufficient detail may lead to a preliminary determination by AAHEA staff that the complaint be dismissed. In such cases, a copy of the complaint will be forwarded to the institution along with a letter of notification indicating that the complaint was determined to be without merit.

Information received by AAHEA not as a complaint, but which indicates that the accredited institution may be in violation of AAHEA standards, policies, or procedures, will require AAHEA to initiate a formal complaint based on that information. These complaints will be processed according to this policy.

A complaint analysis will be provided to the AAHEA Accrediting Commission at each regularly scheduled Commission meeting to include complaints processed and/or received since the previous Commission meeting, as well as other such information the Commission may request.

### **CATEGORIES OF COMPLAINTS DEFINED:**

Complaints are designated as being either with or without urgency. A complaint will be deemed one with urgency if:

1. The basis of the complaint appears to be well founded after initial review; and
2. The continuation of the circumstances upon which the complaint is based could have substantial adverse effects on participants, potential participants, the institution or its employees, or AAHEA. All other complaints will be deemed ones without urgency.

### **INITIAL DETERMINATIONS ABOUT A COMPLAINT:**

1. Upon receipt of a complaint, whether anonymous or from an identified source, or information that may be the basis of a complaint, the Chair of the Complaint Review Committee will first determine if the matter involves AAHEA standards or policies. If it does not, a written report will be made of such decision and the matter closed. The complainant(s) will be notified accordingly.
2. If the complaint relates to AAHEA standards or policies, it will be determined to be a complaint with urgency or a complaint without urgency, as defined above.
3. The fact that a complaint from a graduate or employee of a member institution is received 90 days or more after the student has graduated or has been placed in training-related employment, if applicable, or 90 days after the

employee has separated from the institution, shall be a valid consideration in determining whether to process the complaint.

### **COMPLAINTS WITHOUT URGENCY:**

1. Within fifteen (15) days of receipt of the complaint letter, AAHEA will provide written notification to the institution summarizing the allegations contained therein as related to specific AAHEA standards, policies, and procedures. A copy of the complaint letter will be included in the notification unless the complainant specifically requests anonymity. The notification letter will direct the institution to submit a written response addressing the allegations, and, if appropriate, demonstrating its efforts to resolve the complaint. Any written notice from AAHEA to an institution will be made by certified mail and by one other method or by other means from which the exact date of delivery can be proved. The institution's response will be due within twenty (20) days from the date the institution receives official notification from AAHEA. In the event the certified mail is not signed for by the recipient or rejected, it will be considered delivered as of that date.
2. Within fourteen (14) days of its receipt by AAHEA, the institution's response will be reviewed by the Complaint Review Committee to determine that:
  - a. The complaint was (i) fairly resolved by the institution or (ii) found to be without merit. In such cases, said determination will be confirmed by written notice to the institution and the complainant, and the matter considered closed;
  - b. The complaint is being resolved by the institution, in which case the matter will be regularly monitored by AAHEA to conclusion;
  - c. Additional specific action or information is required of the institution, in which case AAHEA will so notify the institution and continue to monitor to conclusion; or
  - d. The matter is of sufficient seriousness to require processing as a complaint with urgency.
3. If the institution fails to respond as directed, the complaint may be treated as one with urgency and Processed accordingly.
4. Any complaint under this procedure not resolved within **90 days** from its receipt by AAHEA will be deemed a complaint with urgency and processed accordingly.

### **COMPLAINTS WITH URGENCY:**

1. If, upon conferral with the Executive Director and/or Complaint Review Committee, a complaint is deemed to be one with urgency, the time frames for processing will be one half of those deemed to be without urgency. Additional action may be required, in which case the Executive Director, or designee, will confer with the Chair of the Accrediting Commission to determine appropriate action, which may include:
  - a. Further reducing the notice and response periods and proceeding as in other cases;

- b. Initiating an announced or unannounced on-site visit by a team of number and composition appropriate to the circumstances, to be conducted under established procedures for such visits;
- c. Issuing an Order for Show Cause under the procedures for show cause; and/or
- d. Presenting the matter to the full Commission for review and action as it directs. Any complaint with urgency remaining unresolved 60 days after receipt by AAHEA will be so referred to the Commission.

In cases involving paragraphs (b) or (c) above, or where the institution has not demonstrated substantial progress leading to closure and/or resolution, the complaint will be forwarded to the Accrediting Commission at its next regularly scheduled meeting for further review and action.

2. AAHEA will provide written notification to the institution summarizing those allegations related to specific AAHEA standards, policies, and procedures. A copy of the complaint letter will be included in such notification unless the complainant specifically requests anonymity. The notification letter will direct the institution to submit a written response addressing the allegations, and, if appropriate, demonstrating its efforts to resolve the complaint. Any written notice from AAHEA to an institution will be made by certified mail or by other means from which the exact date of delivery can be proved (as above). The institution's response will be due within ten (10) days from the date the institution receives official notification from AAHEA.

#### **COMPLAINTS INITIATED BY AAHEA:**

1. AAHEA may initiate a complaint against an institution upon receipt from any source of adequate information from which one may reasonably believe that a violation of AAHEA standards or policies exists.
2. Upon learning of such information, AAHEA will conduct a due diligence investigation to determine the credibility of the source and the seriousness of the possible violation. A written report of the findings will be made.
3. If a determination is made that a complaint be initiated by AAHEA, the notification will be in writing with sufficient pertinent information to allow the institution to respond accordingly. The matter will then be processed according to its category as defined above.
4. If upon investigation it is determined that there are multiple unanswered complaints from any source, this will be considered a serious violation that must be corrected within **10 working days** or the institution will have its accreditation suspended.

#### **CLOSURE OF A COMPLAINT:**

The determination to close a complaint will be made by vote of the Complaint Review Committee, or in such cases that are referred to the Accrediting Commission, by vote of that body. The complainant and the institution will be notified of the decision in writing. If the complainant submits no new or additional information within ten (10) days of receipt of the notification letter, AAHEA will consider the complaint to be officially closed. A complaint may be reopened if information warranting such action is received.