

CCE[®]

THE COUNCIL ON

CHIROPRACTIC

EDUCATION

Manual of Policies

of

The Council on Chiropractic Education, Inc.[®]

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Foreword

The July 2021 edition of the *CCE Manual of Policies* was approved by the Council at the July 9, 2021 Semi-Annual Council Meeting in accordance with CCE Policy 25, *Authority, Responsibility and Action Regarding CCE Policy*. Based on review and recommendations by the Council, revisions were approved within various CCE policies regarding the following; 1) continued review of language pertaining to institutional vs programmatic accreditation and in alignment with recognition requirement changes, 2) clarifying and/or missing language in multiple areas for both programs and the Council as they align with best practices of programmatic accrediting agencies and CCE practices, 3) combining Policy 1 & 2 into one policy, 4) removing Policy 16, 5) nomenclature in policies requiring minor edits due to change in CCE office premises, and, (6) recent changes in federal regulations from the U.S. Department of Education (USDE).

Questions regarding *CCE Policies* and this manual should be directed to the Council Chair or the CCE President through the CCE Administrative Office.

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CCE Policy 1 Program Changes Requiring Notification and/or Reporting

Accreditation is granted or reaffirmed according to curricula, services, facilities, faculty, administration, finances and conditions existing at the time of that action in accordance with the CCE Accreditation Standards (*Standards*). To ensure programs maintain compliance with the eligibility and accreditation requirements of the *Standards*, the CCE requires prior approval of specific changes before each change can be included in the doctor of chiropractic degree (Program) or residency (Program) accredited status. For this reason, all CCE-accredited programs are required to notify (in writing) or submit applications to the Council as identified in this policy.

A. Definition and Types of Changes

1. The following types of changes require notification only to the Council (in writing, via email, through the CCE Administrative Office) with required notification timeline identified in **bold print**:
 - a) Change in the individual responsible for the program or director of the program or President of the program. **Within 30 days of change.**
In the notification, the program must provide; 1) Name/Title/Email address of new individual, 2) last date the previous individual will hold/held office, and, 3) start/effective date of new individual.
 - b) Change in the CCE designated member representative for the program (*Reference: CCE Bylaws, Section 5.02*). **Within 30 days of change.**
In the notification, the program must provide; 1) Name/Title/Email address of new individual, and, 2) Completed/Signed Council Form 5, Consent to Membership and Designation of Representative (contact CCE Administrative Office).
 - c) Change of control, including consolidation/merger, transfer and/or sale of the program. **When all items 1-4 listed below are available.**
In the notification, the program must provide; 1) Description of the change, 2) Specific timelines regarding the implementation/process of the change, 3) Evidence of approval from the institutional accrediting agency, and, 4) Evidence from the institutional accrediting agency or US Department of Education (as applicable) regarding the final effective date of the merge, transfer and/or sale. NOTE: The programs involved in a consolidation/merger will be considered one accredited program following final approval.
 - d) Moving a campus/program. (Local or Distant) **When all items 1-3 listed below are available.**
In the notification, the program must provide; 1) Description of the change, to include but not limited to, the new location/address of the campus, 2) Specific timelines regarding the implementation/process of the change, to include the effective date of the move, and, 3) Evidence of approval from the institutional accrediting agency.
 - e) Closing a program. (See Section E for further information) **When all items 1-3 listed below are available, and for item 4, within 30 days of the date of closure.**
In the notification, the program must provide; 1) Specific timelines for the implementation of the change, to include, the effective date of closure, 2) Evidence of approval for a teach-out plan and teach-out agreement from the program's institutional accrediting agency, 3) Documentation of the approved teach-out plan and teach-out agreement, and, 4) official notification from the program's authorizing governing body clearly stating its desire to withdraw its accreditation status. (*Reference: CCE Standards, Section 1.II.E.2, Withdraw from Accreditation*)

CCE Policy 1 Program Changes Requiring Notification and/or Reporting (cont.)

2. The following type of change requires prior approval by the Council and submission of an application by the program as described in Section B of this policy:
 - a) Establishing a new location at which it will offer 50% or more of the educational program as a branch campus or an additional educational site. (See Section D for further information)

B. Program Application

The application must describe how the program plans to continue to meet the requirements of the applicable *Standards* while implementing the change, and must include the following information:

For changes listed in Section A.2(a), New Location (Branch campus or additional educational site):

1. Description/summary of the change, to include the percentage of the DC program's total credit hour, and a description of the curriculum (didactic and clinical portions), offered at the branch or additional location. Include an operational description of clinic practicum courses and DCP managed and/or approved clinic site(s) for the branch or additional site.
2. Provide evidence of approval for the new location from the program's authorizing governing body.
3. Identify the accrediting agency that accredits the institution and the institution's current accreditation status with this body. Provide evidence that the institution has, or has applied for, approval to develop/offer a doctor of chiropractic program/degree from its institutional accrediting agency at the new location. If approval is not necessary from the institutional accrediting agency, documentation from that accrediting agency **MUST** include written communication to program representatives or CCE that confirms approval to offer the program/degree is not required at the new location.
4. Provide evidence the program (or institution) obtained state authorization for the new location. If no approval is required, include evidence indicating approval is not needed, (e.g. applicable policy, requirements, or correspondence). **NOTE:** Similar evidence should also be provided for foreign country approvals, as applicable
5. Specific timelines for the implementation of the change, to include, projected and/or actual graduation date of the first cohort of students.
6. Description/summary of physical/learning resources required to support the change, including but not limited to, student support services, facilities, equipment, information technology, etc.
7. Number and credentials of current faculty at the new location and hiring plans for additional faculty leading up to the graduation date of the first cohort of students.
8. Describe how the program will oversee didactic and clinical instruction at the new location, as applicable. Include processes for evaluating and improving the program or educational offerings at the new location.
9. Number of students currently enrolled in the program at the new location and total enrollment projections leading up to the graduation date of the first cohort of students.
10. Provide the operational financial plan and documentation (income, revenue sources, and expenses) for the new location from the beginning of the process through the anticipated graduation date of the first cohort of students.

CCE Policy 1 Program Changes Requiring Notification and/or Reporting (cont.)

All applications must be received by the CCE Administrative Office no later than November 1st for review by the Council at the regularly scheduled Annual Council Meeting (January) or May 1st for review by the Council at the regularly scheduled Semi-Annual Council Meeting (July). The application should be addressed to the Council Chair and submitted via email through the CCE Administrative Office. The application should be concise but also contain all the requirements listed in the Program Application section above.

C. Council Action

Upon receipt of an application, the Council Chair will inform the program when the application will be forwarded to the Council for consideration, whereupon the Council will review the application at their regularly scheduled annual or semi-annual meeting and take one of the following actions:

1. Approve the application;
2. Defer action and request additional information; or
3. Deny approval of the change with no effect on the program's current accreditation.

NOTE: In all instances, the Council will provide a response letter to the program, typically within 30 days of the meeting review date.

When the Council approves an application for change regarding a new location (branch campus or additional educational site), the Council also reviews the CCE Schedule of Accreditation Activities and determines when a site visit will occur and what type of site visit will be conducted at the new location. The site visit may occur at the next reaffirmation comprehensive site visit to the program if scheduling permits or earlier as a focused site visit, at the discretion of the Council.

Following a site visit to the new location, the Council will review the applicable reports (Self-Study Report, Final Site Team Report, Program Response to the Report, etc.), determine if a program's appearance is required at the Council meeting, and make an accreditation decision regarding the new location in accordance with the CCE *Standards*, Section 1.III.A, *Decisions and Actions*. If accreditation is granted to the new location/included in the accreditation of the current program, the Council will notify the appropriate agencies and publish the new location on its official website in accordance with CCE policies and procedures. If the accreditation decision is deferred, the program will be required to submit further information (progress report), with a possible return site visit (at the discretion of the Council), for review by the Council at the next regularly scheduled Council Meeting. If accreditation is denied, the program has the option to file an appeal, if applicable under the provisions of CCE Policy 8, *Appeals of Decisions by the Council*.

If the Council awards accreditation for new locations (branch campus or additional educational site), the effective date the program can implement/publish the change will be the date of the Council's approval letter. A program must not take action to implement/publish any change nor will the change be included in the program's accreditation status before the date on the approval letter. If a program implements/publishes a change before the date on the approval letter, it will be subject to sanctions by the Council.

CCE Policy 1 Program Changes Requiring Notification and/or Reporting (cont.)

D. Additional Educational Site or Branch Campus

The Council defines an additional educational site as a location of a program or part of a program that is geographically apart from the main campus of the institution, but not necessarily independent of the main campus. These sites do not meet the definition of a branch campus as identified below.

The Council defines a branch campus as a location of a program that is geographically apart and independent of the main campus of the institution. A location is independent of the main campus if the location:

1. Is permanent in nature;
2. Offers courses in the DCP leading to the doctor of chiropractic degree;
3. Has its own faculty and administrative or supervisory organization; and
4. Has its own budgetary and hiring authority.

For additional locations (branch campuses and additional educational sites) currently accredited by CCE, the Council will conduct site visits to all locations in conjunction with the regularly scheduled comprehensive site visit for reaffirmation of accreditation (every 8 years) at the main campus. CCE has the option of conducting site visits to all locations during the regularly scheduled interim site visit at the midpoint of a program's accreditation cycle (every 4 years) and will provide appropriate notification to the program prior to the visit.

The Council will list branch campuses and additional educational sites separate from the main campus listing on the official CCE website and in accordance with CCE policies and procedures for public disclosure.

E. Closing a Program

CCE has limited requirements when a program decides to close its doctor of chiropractic degree program. Notification to CCE and periodic updates throughout the process until the program is officially closed is warranted by the program to maintain accreditation status with the CCE. Teach-out procedures will be required of the program and managed by its institutional accrediting body. The US Department of Education defines "Teach-out", "Teach-out plans" and "Teach-out agreements" in 34 C.F.R. Section 600.2 as listed below:

Teach-out - A process during which a program, institution, or institutional location that provides 100 percent of at least one program engages in an orderly closure or when, following the closure of an institution or campus, another institution provides an opportunity for the students of the closed school to complete their program, regardless of their academic progress at the time of closure.

Teach-out plan - A written plan developed by an institution that provides for the equitable treatment of students if an institution, or an institutional location that provides 100 percent of at least one program, ceases to operate or plans to cease operations before all enrolled students have completed their program of study.

CCE Policy 1 Program Changes Requiring Notification and/or Reporting (cont.)

Teach-out agreement - A written agreement between institutions that provides for the equitable treatment of students and a reasonable opportunity for students to complete their program of study if an institution, or an institutional location that provides 100 percent of at least one program offered, ceases to operate or plans to cease operations before all enrolled students have completed their program of study.

Extension of Accreditation

The accreditation of an institution or program ordinarily ceases when the institution is closed or the program ceases operation. When the governing board of an accredited program or institution housing a program decides to close the institution or cease operations of the program, it may seek from the CCE an extension of its accreditation beyond the publicly announced date of closing. The sole purpose of the extension is to ensure that its students can complete the program without undue difficulty. Extension of accreditation is allowed for no longer than 120 days beyond the date of closing, although the Council has the latitude to extend that period under extenuating circumstances. To approve an extension of accreditation, the CCE must be assured of:

1. the outgoing legal existence of the institution beyond closing; and
2. the approval of a teach-out agreement with another institution by the institutional accrediting agency; and
3. the existence of appropriate processes to guarantee that all degrees granted after the date of closing meet the graduation requirements established by an institution.

Approved: 1/28/95

**Revised: 1/24/98, 1/14/01, 1/12/03, 1/22/06, 3/8/09, 1/14/11, 1/13/12, 1/11/13, 4/8/13,
7/11/14, 1/12/18, 7/9/21**

CCE Policy 4 Confidentiality of Council Actions

CCE Councilors, Administrative Office Staff or any other agent of CCE, shall not divulge to any source any aspect of the accreditation process, specifically deliberations, decision-making and accreditation decisions, other than reporting procedures in accordance with *The Council on Chiropractic Education (CCE) Accreditation Standards, Principles, Processes & Requirements for Accreditation* and CCE policies and procedures.

The above listed categories of individuals are required to sign and submit confidentiality agreements prior to Council Meetings, site visits or other CCE related activities. Guests of CCE activities may also be required to sign and submit confidentiality agreements in accordance with policies and procedures.

The Council Chair or the CCE President may, upon written request for specific information by the U.S. Department of Education or authorized personnel, submit information to assist in resolving problems with any CCE-accredited DCP.

Violation of this policy shall subject the above listed categories of individuals to such disciplinary action as the Council may deem appropriate.

Breach of Confidentiality

The Council will address alleged violations of the CCE confidentiality policy by a CCE Councilor, Administrative Office Staff or other agent of CCE when such allegations are submitted in writing and signed by the individual(s) making the allegation(s). The allegation is to be submitted to the Council Chair. Allegations must be specific as to the nature and date of the violation, and should be filed within six (6) months of the alleged violation.

The Council Chair will send a copy of the allegation to the alleged violator within thirty (30) days of receipt. The Council Chair will provide opportunity for the alleged violator to provide a written response to the allegations within thirty (30) days of receipt. The submitted information will be reviewed by the Council Executive Committee, which will then recommend to the Council the disposition of the case. The written allegations and response will be provided to the Councilors along with the recommendation from the Council Executive Committee. Normally, the Council will act regarding the matter at its next regularly scheduled meeting, but the Council Chair may call for a mail response or telephonic meeting if a decision is needed in the shorter term. Confidentiality regarding address of the allegation must be maintained by the Council as a body, all Councilors, the individual(s) charged and the CCE Administrative Office.

The Council may determine the allegation unsubstantiated and notify the alleged violator and complainant that no guilt has been determined. The Council may determine that the allegation is true and shall then determine the appropriate disciplinary action. If the alleged violator is found guilty, the final Council action is recorded in official Council minutes and reported as appropriate.

Approved: 2/2/91

Revised: 1/28/95, 1/13/02, 1/12/03, 3/8/09, 1/17/10, 1/10/14, 7/11/14

CCE Policy 5 Special Consideration for Programs during Emergencies/Disasters

The Council on Chiropractic Education (CCE) recognizes that there are times of local, regional, or national emergency or disaster that may delay or in other ways compromise communications, disrupt operation of classes and/or other services, between CCE-accredited Programs, the CCE Administrative Office, and/or Councilors. For the purpose of this policy/procedure, such an emergency or disaster must impact, operations and/or communications for at least a one-month period. Special consideration is granted by the Council for a period of time to assist the program in maintaining its requirements for accreditation.

This policy is designed to:

1. Ensure the continuity of education – By providing a mechanism for programs to be granted special consideration during emergencies and/or disasters.
2. Provide flexibility to accreditation cycle – During the period of special consideration, submission by the program of any requested information (e.g., Program Characteristics Report, (PCR), Progress Report, Self-Study, etc.) or other action by the program may be delayed by the Council without negative consequences to the program. If an on-site evaluation is scheduled during the granted period, it will be rescheduled. The Council will determine reporting requirements in all other circumstances.
3. Provide information, advice and assistance to Programs – Announcement indicating the period for which the program was granted special consideration status as a result of the emergency or disaster to keep public updated and informed. Maintain communication between Program and CCE Administrative Office

Requests for Special Consideration

In order to avoid unintentional injury to students, programs or other stakeholders during times of emergency or disaster, the following policy will be followed.

1. The Program Chief Administrative Officer (CAO) or accreditation liaison must contact the CCE Administrative Office as soon as possible if an emergency/disaster occurs that has a short or long-term impact on the program that will affect its ability to remain in compliance with the CCE Standards.
2. When communication is established, the Program CAO or accreditation liaison will inform the CCE President if they will be requesting special consideration by the Council under the emergency /disaster policy.
3. Requests for special consideration must include the following information:
 - the nature of the impact to the program and students;
 - tentative plan and timeline for resumption of classes and other services by the program;
 - contact information for Program CAO and accreditation liaison;
 - status of students during the interim period, if any; and
 - length of time for special consideration. (Requests may be granted for a period of time up to one (1) year).

CCE Policy 5 Special Consideration for Programs during Emergencies/Disasters (cont.)

4. Upon receipt of the request, the CCE Administrative Office will forward the request to the Council Chair for review and action. If the Council Chair is unable to determine action, length of the term, or feel that the entire Council should be involved, a conference call or other rapid method for information sharing and decision-making will be requested.

5. Action to grant or deny emergency/disaster special consideration will occur within one week of receipt of the required information and based on the verbal communication and written request from the Program CAO or accreditation liaison.

6. If special consideration is granted by the Council Chair (or Council), the Program CAO or accreditation liaison must provide monthly written updates of progress towards resumption of classes and other services by the educational program.

During the granted period of special consideration, the Program CAO or accreditation liaison may request in writing, one extension for up to one (1) year should it become evident that the program will not resume operations within the initially granted time period and explaining the rationale for the extension. The maximum period a program may be granted special consideration under this policy is two (2) years (one-year initially, followed by a one-year extension).

If the program is not operational at the end of the special consideration period, the program must send a letter of intent from the institution's governing body to the Council stating its intention to maintain accreditation or voluntary withdrawal from accredited status. If the program continues accreditation the Program CAO or accreditation liaison will be informed of the timeline for submission of any previously requested reports as well as the requirements for future reporting activities.

Approved: 1/20/07
Revised: 3/8/09, 1/17/10, 1/13/12, 7/11/14, 7/9/21

CCE Policy 7 Student Admission Requirements

For DCP's that accepts students who lack the minimum admissions criteria as noted in Section 2.G of the CCE *Standards*, the DCP will develop an Alternative Admissions Track Plan (AATP) that addresses the following:

- Alternative criteria and processes used to determine acceptance of AATP students, including rationales for establishing such criteria and delineation of the role of the faculty members in the process. (No student is to be admitted who has completed fewer than 90 semester hours and/or has a GPA for these 90 hours of less than 2.75/4.0.)
- Academic support services to optimize the ability of AATP students to succeed in the program, e.g., transitional studies, tutorials, academic advising, and study strategies.
- Policies and procedures that dictate active interventions based upon student needs.

A DCP that accepts students who lack the minimum admissions criteria of Section 2.G of the CCE *Standards*, will provide the following for each AATP student:

- A record of each student, including date of entry, course load per term, term and cumulative GPA, academic progress, and results of external licensing examinations.
- Evidence that regular reviews of the student's academic record and performance are used to inform appropriate academic support services, such as transitional studies, and/or modified course schedules to optimize the potential for each student's academic success.
- An academic plan for each student who fails to make satisfactory academic progress in accordance with DCP policies regarding such matters, including one or more of the following elements: reduced course schedule, additional tutoring or supplementary instruction and remedial course work.

The DCP will provide **annual** aggregated data, reporting on the number of students admitted under its AATP criteria, plus their GPA, academic progress, and success in passing licensing examinations.

Approved: 1/14/11
Revised: 7/14/17

CCE Policy 8 Appeals of Decisions by the Council

Doctor of Chiropractic Degree Programs or Chiropractic Residency Programs hereafter referred to as programs, have the right to appeal specific accreditation decisions of the Council. These procedures provide for fair, expeditious processing of appeals, but do not constitute quasi-judicial procedures. Both the Council and the program have the right to representation during the appeal process. CCE will be represented by its President and Council Chair.

If the Council Chair has a conflict of interest with the appellant program, the Associate Chair will represent the Council during the hearings. If a conflict exists with the Associate Chair, a Councilor chosen by the Council will represent the Council during the hearings.

Criteria for Appeal

CCE provides clearly delineated fair procedures and opportunities for Programs to appeal accreditation actions of:

- Denial of initial accreditation
- Public Sanctions (Probation, Show Cause Order)
- Denial of reaffirmation of accreditation
- Revocation of accreditation

Standard of Review

The program may appeal the Council's accreditation action on the following grounds:

- that the decision was arbitrary, capricious and not based on substantial evidence in the *Record of Accreditation Proceedings*. Substantial evidence is such relevant evidence which might reasonably be accepted as supporting the concern or area of noncompliance cited;
- that the procedures used to reach the accreditation decision were contrary to established CCE procedures, policies or practices and whether the procedural error prejudiced the Council's decision;
- the decision was otherwise in substantial disregard of the Standards and/or procedures of the Council.

The appeals panel has no authority regarding the reasonableness of CCE's accreditation standards, policies, or procedures. Its role is to determine whether the Council decision was not supported by the record or was clearly erroneous.

Burden of Proof

The program has the burden of demonstrating that the decision of the Council was not supported by the record or was otherwise erroneous. The burden of proof remains upon the program at all times.

CCE Policy 8 Appeals of Decisions by the Council (cont.)

Notice of Council Accreditation Decision

Official notification of the Council accreditation decision will be sent to the email addresses on file for CEO and/or individual responsible for the program and the governing board chair; acknowledgement of receipt by the program must be forwarded to the CCE Administrative Office within 24 hours. The notice shall advise the program that it has the right to appeal the accreditation decision and will provide a copy of CCE Policy 8, *Appeals of Decisions by the Council*, and reference the relevant CCE *Accreditation Standards* and/or *Policies*.

The status of an accredited program remains unchanged until the period for filing an appeal has ended or until the appeal process has been concluded. An appeal filed in accordance with CCE appeal procedures automatically delays the accreditation decision until its final disposition. In the case of a denial of reaffirmation of accreditation or revocation of accreditation, the program remains accredited pending disposition of the appeal.

Public notice of the accreditation action shall be in accordance with CCE Policies and Standards. Final appeal decisions may not be appealed.

Initiation of Appeal

Within twenty (20) days following receipt of the accreditation decision, a program electing to appeal that decision must send a written *notice of appeal* to the Council Chair. The *notice of appeal* shall be sent via email address directly to the CCE President.

The submission of a *notice of appeal* must be authorized by an official action taken by the governing body of the institution of which the program is a part. This *notice of appeal* shall include a brief statement of the grounds for appeal setting forth the arguments the program intends to present to the appeals panel for why it believes the Council's decision was in error. The grounds for appeal must be consistent with the *Standard of Review* and *Rules of Evidence* herein. The *notice of appeal* shall also identify the program representatives, which may include legal counsel, who will be present at the appeal hearing. **If a notice of appeal is not filed within the twenty (20) days following receipt of the accreditation decision, the program will have lost its right to appeal and the action of the Council will become final.**

A *notice of appeal* that is timely filed will be forwarded by the CCE President to the Council Chair. The Council Chair shall acknowledge receipt of the *notice* in writing to the CEO and/or individual responsible for the program.

Criteria and Selection of an Appeals Panel

The CCE Administrative Office staff shall maintain a standing list of persons who are qualified and trained to serve on an appeals panel in the categories of educators, practitioners, and public members, as defined by the U.S. Department of Education. All members shall meet the eligibility criteria for the category of membership they represent. Additionally, members should demonstrate, 1) longitudinal

CCE Policy 8 Appeals of Decisions by the Council (cont.)

experience with CCE, its *Standards* and processes, or accreditation in general, and/or, 2) academic or professional experience demonstrating familiarity with higher education and/or accreditation processes. No individual is eligible to serve on an appeals hearing panel that is or has been previously involved with the appellant program and is otherwise subject to CCE's Conflict of Interest policies, was part of the review activity that led to the specific Council accreditation action, or who is a current Councilor.

The names of the eligible appeals panel members shall be forwarded by the CCE President to the CEO and/or individual responsible for the program within seven (7) days following receipt of the *notice of appeal*. Within 14 days of receipt of the list of eligible appeals panel members, the program shall have the opportunity to present any objections regarding the composition of the appeals panel, together with a statement of the reasons for its objections, including any assertions of conflict of interest.

The Council Executive Committee shall appoint the three-member appeals panel, chosen from the list of eligible Appeals Panel members within 14 days of receipt of any objections and/or conflicts of interest declarations submitted by the program. Once the appeals panel has been selected, the program requesting the appeal and the Council Chair are so notified by the CCE President.

Within 14 days of appointment of the appeals panel, the appellant program and Council Chair shall be notified by the CCE President of the date, time, and place of the hearing. If a designated appeals panel member withdraws or is removed by the Council Executive Committee, the Council Executive Committee shall appoint a replacement from the list of acceptable appeals panel members.

In the event the Council Executive Committee cannot be convened in a timely manner the Council Chair shall appoint a replacement from the list of acceptable appeals panel members.

The Council Executive Committee shall appoint a Chair from among the appeals panel members selected to hear the appeal.

Submission of Statement of Grounds for Appeal

Within thirty (30) days from the date the program receives notice of the appeal hearing, the program will submit one (1) electronic version of its *Statement of Grounds for Appeal* to the CCE Administrative Office, Attn: CCE President. The *Grounds for Appeal* must set forth the program's arguments and evidence in support of its appeal. Upon receipt, the electronic version shall be distributed to the appeals panel, Council Chair and maintained on file in the CCE Administrative Office for the record. Upon receiving the *Grounds for Appeal*, the CCE President will acknowledge receipt in writing to the CEO and/or individual responsible for the program and copy the Council Chair.

The Record of Accreditation Proceedings

- The appeals panel members and the appellant program shall receive from the CCE President the record of the accreditation proceedings within 10 days of appointment of the appeals panel.
- The record of the accreditation proceedings shall include the following as applicable to the appeal (from the accreditation cycle in question):

CCE Policy 8 Appeals of Decisions by the Council (cont.)

1. Correspondence between the Council and the program related to the accreditation decision
 2. Self-Study Report or Revised Application for Accreditation
 3. Site Visit Team Report or applicable report
 4. Program Response to Site Visit Team Report and Correction of Errors in Fact
 5. Progress reports submitted by the program
 6. Program Characteristics Reports (PCR) submitted by the program
 7. The program grounds for appeal statement
- One (1) copy of the entire record for appeal (appeal process correspondence, record of the accreditation proceedings and appellant program's *Grounds for Appeal*) shall be maintained by the CCE Administrative Office in accordance with the CCE File and Records Management Plans.

Hearing

- The appeal hearing shall be held within 60 days (but not earlier than 45 days) after the appeals panel has been appointed. Any change in the hearing schedule must be approved in advance by the Council Chair.
- The appeal hearing shall be professionally audio recorded. Either party may, at its expense, require such recordings be transcribed. No other recording will be permitted.
- Legal counsel for the program and/or CCE may be present. Because the hearing is an administrative mechanism for peer review rather than an adversarial proceeding, there is no provision for cross-examination for the representatives(s) of CCE or the program.
- The appeal hearing shall commence by the Chair of the appeals panel calling the hearing to order and providing an opening statement identifying each person present, describing applicable standard(s) and/or policy(ies) and the procedures to be followed during the hearing.
- All procedural requests or challenges, including the appropriateness of evidence to be heard, shall be decided by the Chair of the appeals panel, in consultation with the other members of the appeals panel.
- The appellant program will be permitted to make an oral statement of no more than 45 minutes in length in support of the appeal and answer any questions from the appeals panel. The presentation must not raise issues that were not addressed in the Statement of Grounds for Appeal and must be in accordance with the *Rules of Evidence* set forth herein.
- CCE representatives may make an oral statement of no more than 45 minutes in length in support of the decision under appeal and answer any questions from the appeals panel.
- The Chair of the appeals panel may recess the hearing at any time for discussion amongst the appeals panel members in executive session.
- At the conclusion of the hearing, the Chair of the appeals panel will provide an opportunity for a closing statement by the program, followed by a closing statement by CCE, of no more than 5 minutes from each party.
- The Chair of the appeals panel will inform the participants of the timetable of remaining steps in the process.
- The appeals panel will adjourn the hearing, and deliberate in executive session to reach a decision.

CCE Policy 8 Appeals of Decisions by the Council (cont.)

Rules of Evidence

Only evidence that is part of the *Record of Accreditation Proceedings* and was considered by the Council in reaching the accreditation decision on appeal may be included in the *Grounds for Appeal* or introduced or referred to during the appeal hearing, including revised data or program descriptions that were not reviewed initially by the Council. The only exception to this rule is for review of new financial information if all of the following conditions are met:

1. The financial information was unavailable to the program or to the Council until after the decision subject to appeal was made, and
2. The financial information is significant and bears materially on the financial deficiencies identified by CCE. The criteria of significance and materiality are determined by CCE, and
3. The only remaining deficiency cited by CCE in support of a final accreditation decision is the program's failure to meet the CCE standard pertaining to finances.

Furthermore, the program may seek the review of new financial information described above only once and any determination by CCE made with respect to that review does not provide a basis for an additional appeal.

Decisions on Appeal

The appeals panel must act by majority vote. The appeals panel has and uses the authority to make the following decisions:

- To affirm,
- Amend, or
- Remand the accreditation decision back to the Council.

A decision to affirm, or amend, the accreditation action is implemented by the Council in a manner consistent with the appeals panel's decision. In a decision to remand the accreditation action back to the Council for further consideration, the appeals panel must explain the basis for the decision and identify specific issues that the Council must address, and the Council must act in a manner consistent with the appeals panel's instructions.

Post-Hearing Procedures

The appeals panel members shall decide on the issues presented in the appeal. The appeals panel shall issue its findings and decision as follows:

- Each area of concern or cited area of noncompliance will be considered separately and the appeals panel will determine whether each concern or area of noncompliance is supported by substantial evidence in accordance with the *Standard of Review*.

CCE Policy 8 Appeals of Decisions by the Council (cont.)

- The appeals panel will determine whether those concerns or areas of noncompliance supported by substantial evidence are sufficient to support the accreditation decision of the Council.
- The appeals panel will determine whether the procedures used to reach the accreditation action were in error and whether procedural error prejudiced the Council's decision.
- The appeals panel will prepare its report, using the CCE template titled *Appeals Panel Report*, detailing its findings and will issue a decision to affirm, amend, or remand the accreditation action of the Council.
- The findings and decision of the appeals panel shall be submitted by its Chair to the CCE Administrative Office within ten (10) business days of the appeal hearing. The CCE President will then send a copy of the final report to the Council Chair and the CEO and/or individual responsible for the program.

Under extraordinary circumstances, the specified time limits may be extended with the mutual consent of the Council Chair, the Chair of the appeals panel and the appellant program.

Final Action and Notification

If the appeals panel affirms the action of the Council, the decision of the Council becomes final and effective on the date of the appeals panel decision and is not subject to further appeal.

If the appeals panel amends, or remands the accreditation action of the Council, the Council will meet in person or by telephone conference call to review the decision of the appeals panel and implement the specific issues detailed in the appeals panel report. These decisions are final and not subject to further appeal. CCE will notify the U.S. Department of Education, the appropriate state regulatory authorities, the appropriate accrediting agencies and the public of the final decision in accordance with CCE Policy 111.

Financial Responsibility for an Appeals Hearing

The program making the appeal shall assume the expense involved in the development and presentation of its appeal. All expenses associated with the hearing, such as those for the meeting room, administrative support, travel, meals and lodging for members of the appeals panel, shall be the sole responsibility of the appellant program. The CCE Administrative Office will arrange for and bear the costs of the appeal during the appeal process and forward an itemized invoice to the appellant program at the conclusion of the appeal process. The appellant program will be given 14 days from receipt of the invoice to provide payment of the appeal to the CCE Administrative Office. The expenses of representatives, including legal counsel, for the hearing shall be assumed by the party requesting their presence.

Record of Appellate Proceedings

The Record of the Appellate Proceedings, which includes the appellate brief(s) and the transcript of the hearing, is proprietary to the Council and shall not be used for any purpose other than as authorized by CCE or in connection to a subsequent legal proceeding.

Approved: 1/13/02
Revised: 1/12/03, 1/8/05, 3/8/09, 1/14/11, 1/13/12, 4/8/13, 1/10/14, 7/11/14, 1/12/18,
1/10/19, 7/9/20, 7/9/21

CCE Policy 9 Exceptions and Waivers to the CCE *Standards*

The purpose of the Council is to certify the quality and integrity of Doctor of Chiropractic Degree Programs (DCPs) by interpreting the criteria for and conducting the process of accreditation. While the CCE *Standards* exist to ensure fairness and consistency in accreditation decisions, they are not intended to discourage innovation, nor are they designed to function as an unfair barrier to accreditation when a DCP is faced with exceptional circumstances.

An exception or waiver to the CCE *Standards* may be granted by the Council to a program under rare and extraordinary circumstances, on a case-by-case basis. The program must demonstrate that the normal application of the standard or policy presents an undue hardship to the program, its students or other constituents and that the underlying purpose and intent of the standard or policy will be met notwithstanding the exception. The burden of proof rests with the program.

A request for an exception or waiver must be submitted on a CCE *Standards* Exception/Waiver Request Form, and be supported by written documentation describing the circumstances that justify the request. The request also must provide details, with timelines where appropriate, regarding the manner whereby the DCP will continue to maintain compliance with the *Standards* during the exception/waiver period. In particular, the DCP must provide evidence of available resources sufficient to support a DCP that maintains compliance with the *Standards*. The Council will retain exclusive authority to approve or deny requests for exceptions or waivers. The Council decision will be based on the DCPs documented ability to maintain compliance with the *Standards*.

The Request Form must be submitted to the Administrative Office at least 60 days prior to the next scheduled Council meeting, in order to be included for deliberation at that meeting. At the conclusion of deliberations, the Council will notify the DCP of any actions taken, in accordance with CCE *Standards* notification procedures. Decisions on waiver requests are final and not subject to appeal.

Approved: 1/8/05
Revised: 3/8/09, 1/17/10, 7/9/21

CCE Policy 10 Academy of Site Team Visitors

The Council establishes and maintains a roster of selected individuals, known as the Academy of Site Team Visitors or *Academy*, to conduct accreditation-related site team visits to programs/institutions. Announcements seeking qualified candidates are periodically disseminated to CCE-accredited programs/institutions, state licensing boards, national/state professional organizations and national/regional/specialized accrediting agencies, extending invitation to apply or make nominations for membership in the Academy. Upon selection, individuals serve an initial three-year term, which may be repeated.

Individuals applying to the Academy are required to complete and/or submit the following information to the CCE Administrative Office for review by the Site Team Academy Committee:

- a. Academy of Site Team Visitors application.
- b. Current resume/CV, detailing experience and qualifications in one or more of the five areas of required expertise.
- c. Two letters of reference/recommendation.
- d. A letter of intent from the applicant expressing his/her interest in serving on the Academy.
- e. If the nominee is employed at a program/institution, a letter from the appropriate program/institutional supervisor agreeing to provide release time for service on a site team.

The Academy is comprised of individuals qualified to review programs and institutions of higher education in one or more areas of expertise covered under the Standards:

- a. Finance, facilities and financial aid.
- b. Mission, goals, objectives, self-assessment and planning, governance, administration, student services and admissions.
- c. Basic sciences – faculty, curriculum, instruction, learning assessment, and research.
- d. Clinical sciences – faculty, curriculum, instruction learning assessment, and program learning resources.
- e. Assessment of learning / clinical competency through core clinical training, clinic experience and management, competency assessment and service.
- a. Core clinical training, clinical experience and management and patient quality assurances (QA).

In most instances, comprehensive site teams include a practicing doctor of chiropractic.

As qualified, individuals are assigned primary area(s) of responsibility with the expectation that they will be available to support in all other areas. Once an individual has agreed to serve in the Academy, he/she must receive specific information and training before going on a site visit. As terms in the Academy expire, and as members retire or withdraw, new members will be invited to apply and experienced members will be further trained in other areas and as potential chairs.

CCE Policy 10 Academy of Site Team Visitors (cont.)

To be eligible for appointment or recommended for further service to the Academy of Site Team Visitors, individuals must:

- a. Have expertise and knowledge in higher education practices, educational accreditation, professional licensure and/or clinical chiropractic practice.
- b. Demonstrate writing and computer skills sufficient to effectively communicate site team findings, summarize conclusions, and clearly articulate concerns and recommendations directly related to the requirements of the Standards.
- c. Demonstrate integrity, objectivity, fairness and ethics.
- d. Demonstrate professional responsibility and sound judgment.
- e. Demonstrate ability to work efficiently and autonomously with assigned duties and as a team member in contributing to the overall work of the team.
- f. Demonstrate ability to meet deadlines.
- g. Attend a minimum of one training session/workshop for site team members within a term of appointment.
- h. Be available to serve on at least one (1) site team visit annually, if requested.
- i. Maintain confidentiality as specified by CCE policies and procedures and in accordance with CCE Policy 4.
- j. Disclose conflicts or potential conflicts in accordance with CCE Policy 18, *Conflicts of Interest*.
- k. Act, at all times, with professional demeanor.

The Site Team Academy Committee conducts service reviews of term expiring Academy members at regularly established meetings considering factors such as, site team chair evaluations, availability, training attended over the rating period, and performance on site visits. If the committee determines that an individual no longer meets the eligibility requirements of the Academy, the Chair of the Site Team Academy Committee may request removal from the Academy roster or further training. The Council Chair is notified and the Council determines further service of the individual or training based on the recommendation of the committee.

All Academy members must inform the Site Team Academy Committee Chair immediately (through the CCE Administrative Office), and decline to participate, if invited to serve on a team visiting a Program at which they have a personal conflict of interest (Reference: CCE Policy 18, *Conflict of Interest*).

Approved: 2/2/91

Revised: 12/13/96, 1/13/02, 1/12/03, 1/11/04, 1/22/06, 3/8/09, 1/17/10, 7/11/14, 7/9/21

CCE Policy 11

CCE Site Visit Teams

The Council on Chiropractic Education (CCE) site visit teams represent the Council in evaluating programs. The site team is comprised of individuals qualified to review one or more areas in the Standards.

The CCE Council Chair, working in coordination with the Council Site Team Academy Committee Chair and the CCE Administrative Staff, selects team members from the current Academy of Site Team Visitors roster. Selection is based upon academic and professional experience; area(s) of expertise; previous team experience, and past performance. Every effort is made to avoid selection of individuals with known conflicts of interest. (Reference: CCE Policy 18, Conflict of Interest).

The Chief Administrative Officer (CAO) of the program is encouraged to discuss any concerns about proposed team members with the CCE Council Chair and/or the CCE President before submitting a request for removal. Any request for removal of the proposed team member must be submitted to the CCE Council Chair within seven (7) working days of the receipt of the roster of proposed team members by the program/institution.

Size and Composition of Site Visit Teams and Length of Visits

Comprehensive (Full) Site Visit - Full reviews of a doctor of chiropractic degree program applying for initial accreditation or reaffirmation of accredited status are scheduled for the spring or fall following submission of the self-study report. Generally, six team members (to include the Site Team Chair) comprise this site visit team and are selected from each category of expertise. The categories include, but are not limited to, Governance/Administration/Planning & Program Effectiveness, Resources - Finance/Facilities, Faculty/Research/Scholarship, Student Support/Admissions/Service, and Curriculum, Competencies and Outcomes. The normal length of this visit is four days with the exit briefing on the fourth day.

Residency Program Comprehensive (Full) Site Visit - Full reviews of a residency program applying for initial accreditation or reaffirmation of accredited status are scheduled for the spring or fall following submission of the self-study report. Generally, two team members (to include the Site Team Chair) comprise this site visit team and are selected from Academy members trained in residency program evaluation and/or with accreditation expertise. The normal length of this visit is two days with the exit briefing on the last day of the visit.

Focused Site Visit - Focused review conducted at the discretion of the Council to address issues or concerns needing attention or follow-up. These visits include approval of a substantive change. Generally, two to three team members (to include the Site Team Chair) comprise this site visit team and are selected in the category(s) of expertise needed to perform the visit. The length of this visit varies based on the review needed by the Council, but generally, three days is appropriate with the exit briefing on the third day.

Interim Site Visit - Follow-up review scheduled midway through the routine accreditation cycle. The Council has the option of conducting or not conducting the visit if no concerns or issues have been

CCE Policy 11 CCE Site Visit Teams (cont.)

Identified. If necessary, two or three team members (to include the Site Team Chair) generally comprise this site visit team and are selected in the category(s) of expertise needed to perform the visit. The length of this visit varies based on the review needed by the Council, but generally, two to three days is appropriate with the exit briefing on the last day of the visit.

In all instances when a site visit is conducted, the Council Chair may extend the visit length or change the size of the team due to the complexity of the visit. Site visits are conducted in the following formats, at the discretion of the Council Chair, 1) on-site by all team members, 2) virtual site visit only, or, 3) a combination of on-site and virtual. When comprehensive site visits are conducted in a virtual format, a follow-up on-site visit will occur (with 1-2 team members or staff or a combination of both), typically within one year following the virtual site visit.

Approved: 1/13/02

Revised: 1/12/03, 1/8/05, 1/22/06, 5/16/06, 3/8/09, 1/17/10, 7/11/14, 1/10/19, 7/9/20

CCE Policy 12 Suits Against CCE, Jurisdiction, Venue and Choice of Law

Jurisdiction and venue of any suit, claim, or proceeding relating to membership, accreditation, or accredited status, whether a claim for damages or for injunctive or declaratory relief, brought by an accredited member, former member, or applicant for membership and accredited status, against CCE or a CCE Councilor, officer, committee member, an Appeals Panel, or a member or staff member acting in his or her official capacity shall only be in the U.S. District Court for the District of Arizona (Phoenix). The law of Arizona shall govern the interpretation, validity and performance of the terms of the *CCE Bylaws*, *Manual of Policies* and the *Accreditation Manual*, as well as any dispute between an accredited member, former member, or applicant for membership and CCE, regardless of the law that might otherwise be applied under any principles of conflicts of laws. Accredited members, former members and applicants must exhaust all administrative remedies provided for in the *CCE Bylaws*, *Manual of Policies* and *Accreditation Manual* before initiating any suit, claim, or proceeding in a court of law.

Approved: 1/13/12

Revised: N/A

CCE Policy 14 Accreditation Fees and Assessments

In accordance with CCE Bylaws, the Council may set and levy accreditation fees and assessments for CCE-accredited programs and determine such penalties as it deems appropriate for nonpayment. Payments shall be made within each fiscal year.

The fees and assessments are based upon (either or both):

- a. Base fee assessment for each program/institution.
- b. Pro-rata Full-Time-Equivalent (FTE) student assessment.

Payments are due within 30 days of date of invoice (DOI). If necessary, one reminder will be sent with an additional 30-day notice. If payment is not received within that period of time (60 days following DOI), the invoice will be considered overdue and late fees will apply. A late fee of 10% will be added as an overdue fee if payment is not received within the 60-day window described above. After another 30 days (90 days following DOI), the late fee will increase to 15% of the total amount due and after another 30 days (120 days following DOI), the late fee will increase to 20% of the total amount due. Continued nonpayment will be referred to the Council for consideration of sanctions and/or withdrawal of program accreditation. The Council shall also approve and levy emergency fees and assessments as the need arises.

Doctor of Chiropractic Degree Programs (DCPs)

Annual FTE student assessment fees are applied biannually. There shall be a 3% annual fee increase each fiscal year. Notice will be given to all programs should the annual fee increase change.

Chiropractic Residency Programs

Annual assessment fees are applied as follows:

- a. Programs with less than 10 residents - \$1,500
- b. Programs with 10 or more residents - \$2,500

Comprehensive Site Visits

Before a comprehensive and/or initial/reaffirmation site visit, DCPs being visited are pre-billed by CCE for the estimated cost of the site team visit. The estimate used is for a seven-person four-day visit in the amount of \$21,000. In the event that more/less persons or days are assigned to the site visit, the CCE President will adjust the amount accordingly. The DCP must pay these fees at least three (3) weeks prior to the visit. NOTE: Estimated cost may vary in the event the visit is to take place virtually or in a hybrid format.

If the actual cost of the site visit exceeds or is less than the billed amount by more or less than 5%, the CCE Administrative Office will send an additional invoice or refund the DCP for that amount. Variations of 5% or less will not be refunded or billed to the DCP.

Focused and Interim Site Visits

Focused and Interim site visits to DCPs may be assigned with various combinations of persons and days. Due to this variation, these types of visits are billed at cost plus eight (8) percent for administrative overhead after the visit has occurred and actual costs are tabulated.

CCE Policy 14 Accreditation Fees and Assessments (cont.)

Residency Program Site Visits

Comprehensive (initial/reaffirmation) and Focused site visits to Residency Programs may be assigned with various combinations of persons and days. Due to this variation, these types of visits may be billed prior to (flat fee rate) or after the site visit (cost plus 8% for administrative overhead) based on historical data.

NOTE: All costs for observers assigned to site visits by CCE (new Councilors, new Academy members in training, etc.) are borne by CCE. Any observers assigned by recognition organizations (USDE or CHEA) are borne by the respective organization. In all cases, the program is not responsible for costs incurred by observers.

Initial Accreditation Fees

Along with the submission of eligibility documents, the prospective DCP applying for initial accreditation with CCE will be billed an initial application fee of \$2,500, due upon receipt of the Initial Application of Eligibility, whether found eligible to apply or not. Residency programs applying for initial accreditation are billed an initial application fee of \$1,000, following the same process as above.

If the prospective DCP is determined to be eligible for application by the Council, the DCP will be required to submit an initial self-study report approximately 6 months prior to the scheduled site visit and an additional fee of \$5,000 will be billed and due upon receipt of the initial self-study report. Residency programs submitting an initial self-study report are billed an additional fee of \$2,000, following the same process as above.

NOTE: If a prospective DCP is applying for initial accreditation of both its DCP as well as its Residency Program, the initial application fee of \$2,500 and initial self-study report fee of \$5,000 only apply.

Approved: 1/13/02
Revised: 1/12/03, 1/8/05, 3/8/09, 1/17/10, 7/11/14, 7/11/15, 7/15/16, 7/9/21

CCE Policy 15 Attendance and Procedures at Council Meetings

The Council designates the regularly scheduled annual and semi-annual meetings as open (business) and/or closed (accreditation) sessions. The business portion of these meetings is open to interested observers from all members of the public. Those attending are observers only and do not participate in the Council's discussion. Confidential accreditation matters are discussed in a closed session of the meetings that is not open to observers.

Public Comments Registration

The Council Chair (at his/her discretion) may designate time on the agenda for public comments in the business portion of the meetings. Observers are welcome to provide oral comments during this time period and are required to pre-register with the CCE Administrative Office, following posting of the meeting announcement on the CCE website (www.cce-usa.org), to assist the Council in making arrangements for the meeting. To make an oral comment, all observers must register no later than June 30 for semi-annual meetings in July and no later than December 31 for annual meetings in January. No observers in attendance or making oral comments may distribute written materials at the meetings.

Invited Recognition Agency or Other Representatives

The Council may invite representatives of the US Department of Education (USDE) and/or the Council on Educational Accreditation (CHEA) to observe Council proceedings in accordance with USDE and CHEA recognition requirements. In addition, the Council may invite representatives of other organizations/associations to observe Council proceedings and/or provide information to the Council. All invited observers must sign and submit confidentiality agreements in accordance with CCE Policy 4, *Confidentiality of Council Actions*.

Excusal/Costs

At the discretion of the Council, observers may be excused during any portion of the Council Meeting and are always excused if the Council moves to executive session (in accordance with *Roberts Rules of Order*). The Council does not assume any travel, hotel or other costs for observers attending the meetings.

Approved: 7/14/17

CCE Policy 18 Conflict of Interest

Councilors, Academy of Site Team Visitors, Member Representatives, CCE Administrative Office Staff, other CCE Representatives, Appeals Panel Members and Consultants retained by CCE; shall not engage in activities that would result in a conflict of interest, or the appearance of a conflict of interest that would affect their ability to be impartial and objective with their CCE-related duties or that would result in personal gain to themselves.

Those categories of individuals listed above will report and/or declare potential or real conflicts of interest prior to each Council Meeting, site visit or other CCE related activity when a potential or real conflict of interest exists. The CCE Administrative Office will maintain all conflict of interest declarations in accordance with the CCE Records Management and File Plans.

The Council expects Academy of Site Team Visitors to avoid potential conflicts of interest in the peer review process. Councilors must avoid personal situations that might present conflicts of interest in their relations with DCPs, institutions, or residency programs.

Councilors should recuse themselves from discussion and/or decision-making when conflicts exist that warrants such exclusion. The Council Chair has final authority over councilors and site team members in deciding appropriate measures to be taken when conflicts of interest exist.

Obligations and Responsibilities:

The following circumstances are considered conflicts of interest for all categories of individuals listed above if the individual in question:

- a. is a graduate of the CCE accredited program or institution within the past five years;
- b. is or has been a compensated consultant, within the past eight years for the CCE accredited program. Providing unpaid services, such as occasional (guest) lectures or presentations does not represent a conflict of interest;
- c. is or has been an appointee or employee (e.g., a board member, extension faculty) of the CCE accredited program within the past eight years;
- d. is or has been a candidate for employment at the CCE accredited program within the past year;
- e. has a family member who is an employee, board member, candidate for employment, or student at the CCE accredited program;
- f. is a current employee of an organization that has an academic affiliation agreement with a CCE accredited program or a program seeking accreditation with CCE; or
- g. feels there is any circumstance that could be a real, potential, or apparent conflict of interest that would impair the ability to be impartial or objective in carrying out CCE-related duties.

CCE Policy 18 Conflict of Interest (cont.)

Observers:

a. Council Observers

The Council Chair may assign a councilor to observe a site visit at a program to provide the councilor with a better understanding of the accreditation process. A Council observer may not participate in the work of the site visit team including deliberations, decision-making or report writing. The Council observer may participate in Council deliberations, decision-making and status/progress review decisions.

b. Site Team Observers

The Council Chair may assign an individual to observe a site visit at a program as part of the training process for selection to the Academy of Site Team Visitors or for a current Academy of Site Team Visitor to shadow a site team chair for training/future assignment as a chair. In these instances, the individual may not participate in the deliberations, decision-making, report writing or consensus process of the site team as outlined in the *CCE Accreditation Manual*.

Consulting:

A Councilor or a member of a site visit team shall not serve the program as a compensated consultant for a period of at least one-year following the final accreditation action.

Approved: 2/2/91

**Revised: 1/13/02, 1/12/03, 1/8/05, 1/22/06, 1/20/07, 3/8/09, 1/17/10, 1/13/12, 4/8/13,
7/15/16, 7/14/17, 1/10/20, 7/9/21**

CCE Policy 19 Official Documents and CCE Spokespersons

No individual Councilor, CCE Administrative Staff member, Academy member, CCE consultant, CCE committee/task force member, agent or other person is empowered to make or modify official documents, policy, rules, procedures and decisions on behalf of CCE.

The official spokesperson for the Council is its Council Chair or his/her designee, while the official spokesperson for CCE is its President.

Approved: 2/2/91
Revised: 1/12/03, 3/8/09, 1/17/10, 1/10/20

**CCE Policy 20 Notification of U.S. Secretary of Education Regarding Fraud,
Abuse or Failure to Meet Title IV Responsibilities**

Should the Council have reason to believe that any Council on Chiropractic Education-accredited DCP is failing to meet its Title IV, Health Education Assistance (HEA) DCP responsibilities, or is engaged in fraud or abuse, the Council will provide to the U.S. Secretary of Education the name of that DCP, and the reason for concern, within fifteen (15) days of discovery. Due to confidentiality requirements; the program/institution will not be notified of CCE's intent to notify the U.S. Secretary of Education.

Approved: 1/24/98
Revised: 1/12/03, 3/8/09, 1/11/13

CCE Policy 22

Program Integrity & Representation of Accreditation Status

Integrity

In all relationships with CCE, the Program/Institution shall demonstrate honesty and integrity. In submitting materials for initial accreditation or reaffirmation of accreditation, or other reporting procedures, the program agrees to comply with The Council on Chiropractic Education (CCE) requirements, policies, guidelines, decisions and requests. During the processes of accreditation, the program must evidence full and candid disclosure, and shall make readily available all relevant information. The program shall provide the Council with unrestricted access to all parts and facets of its operations, with full and accurate information about program affairs, including reports of other accrediting, licensing, or auditing agencies, as requested.

Breaches of Integrity

A program's failure to disclose information honestly and completely by presenting false information, by the intentional omission of relevant information, or by distortion of information for the purpose of deliberate misrepresentation, will be considered to be a breach of integrity, in and of itself. If it so appears to the Council that the program has compromised the parameters of integrity in either the materials or information submitted, or in any other manner that requires immediate attention, an investigation may be instituted. After the investigation, the program will be afforded an opportunity to respond to any alleged infractions.

Actions

The Council may require additional reports and/or schedule a special visit to determine if a breach of integrity has occurred. Verification of any instances of breaches of integrity may affect the program's standing with the Council. If, after notice and opportunity to respond, the Council concludes that the program is willfully practicing misrepresentation, or has presented false information to the Council or to any other concerned parties, action may be taken to withdraw accreditation. The Council may withdraw accreditation in the event the program fails to provide and disclose completely all relevant information and materials requested by the Council. The Council may or may not place the program on probation before withdrawing accreditation, but fully reserves the discretionary power to act in the manner that is deemed most suitable to address any occasion of breaches of integrity and disclosure.

Public Statements

The Council reserves the right to verify the accuracy of the program's public statements. In all instances, the program should contact CCE for review and approval of any statements not specific to CCE policies and procedures prior to publishing such statements.

A doctor of chiropractic degree program (DCP) accredited by the Council must use the following statement when describing its status publicly (to include the DCP's official website):

"The Doctor of Chiropractic degree program at (name of institution) is awarded programmatic accreditation by The Council on Chiropractic Education, 10105 E. Via Linda, Suite 103 - 3642, Scottsdale, AZ, 85258-4321, Phone: (480)443-8877, Website: www.cce-usa.org."

A chiropractic residency program accredited by the Council must use the following statement when describing its status publicly (to include the program's official website):

CCE Policy 22 Program Integrity & Representation of Accreditation Status (cont.)

“The chiropractic residency program at (name of institution) is awarded programmatic accreditation by The Council on Chiropractic Education, 10105 E. Via Linda, Suite 103 - 3642, Scottsdale, AZ, 85258-4321, Phone: (480)443-8877, Website: www.cce-usa.org.”

A DCP accredited by the Council that also includes a chiropractic residency program accredited by the Council must use the following statement when describing its status publicly (to include the DCP’s official website):

“The Doctor of Chiropractic degree program and chiropractic residency program at (name of institution) are awarded programmatic accreditation by The Council on Chiropractic Education, 10105 E. Via Linda, Suite 103 - 3642, Scottsdale, AZ, 85258-4321, Phone: (480)443-8877, Website: www.cce-usa.org.”

Any program (DCP or Residency) that has, a) submitted an application for initial accreditation, b) received approval of the application by the Council, and c) been provided with Self-Study, Site Visit and Status Review Meeting dates by the Council, may only use the following statement when describing its status publicly (to include the program’s/institution’s official website):

“The (Doctor of Chiropractic degree program or chiropractic residency program) at (name of institution) is currently engaged in the process of seeking programmatic accreditation by the Council on Chiropractic Education, 10105 E. Via Linda, Suite 103 - 3642, Scottsdale, AZ, 85258-4321, Phone: (480)443-8877, Website: www.cce-usa.org. During this application process, the program does not hold accredited status with the agency, nor is eventual accreditation ensured.”

Programs may provide additional information regarding its accreditation status with CCE, for example, the historical account of its accreditation, but it must do so separately and independent of the required statements listed above and all such additional information must be accurate.

If the Council determines that a CCE-accredited program/institution is making incorrect, misleading or misrepresentation of public statements about its accreditation status, the contents of site visit reports, program effectiveness, success of graduates and/or Council accrediting actions, the Council will act to have the program/institution publicly correct the statements within a specified time frame. If the program/institution does not take corrective action within the time period established by the Council, the Council may, at its discretion, release a public statement in such form and content as it deems necessary to provide the public with the correct information and consider further action regarding the program/institution.

Approved: 2/2/91
Revised: 1/12/03, 3/8/09, 1/17/10, 1/14/11, 7/11/14, 7/11/15, 7/14/17, 1/10/20, 7/9/21

CCE Policy 23 Authority, Responsibility and Action Regarding CCE Standards

Systematic Program of Review for the CCE Standards

This policy delineates CCE’s plan for comprehensive review to determine the Standards are adequate to evaluate the quality of the education or training provided by the institutions and programs it accredits and relevant to the educational or training needs of students.

Initiation of Proposed revisions to the CCE Standards

To facilitate and maintain excellence in the measure of the academic quality of chiropractic education, to improve the accreditation process and reflect student educational and training needs, the *CCE Accreditation Standards, Principles, Processes & Requirements for Accreditation (Standards)*; and related *CCE Policies, Manuals, etc.*, undergo a systematic cycle of reassessment over an eight-year period of time.

A Task Force is established by the Council Chair to undertake the process of *Standards* revision. There is opportunity for all constituencies of interest to review drafts of the proposed *Standards* and provide public comment for consideration by the Council. Constituencies of interest include but are not limited to: USDE, CHEA, other accrediting agencies, chiropractic professional organizations, regulatory bodies, and Doctor of Chiropractic programs.

Procedures for Submission of changes to the CCE Standards

The following table outlines the tentative timelines for the cycle of such activities; proposed revisions will be coordinated through the CCE Administrative Office as follows:

Overview of the CCE Systematic Standards Revision Activity	Target Date
YEAR 1	YEAR 1
1. Council Chair appoints Standards Review Task Force (SRTF), CCE Staff invites appointees, and listing of SRTF members is posted to the CCE website to inform the public that the systematic review cycle for <i>Standards</i> revision has begun.	January – July
2. CCE Staff provides SRTF Chair with feedback received from DCPs and Academy of Site Team Visitors of recent site visits.	Following appointment of SRTF
3. SRTF conduct meetings, develop plan/timelines and assigns subcommittees to areas of responsibility within the <i>Standards</i> .	July – December
4. SRTF Chair completes an update/report for review by the Council at its Annual Meeting.	Prior to Annual Meeting
YEAR 2	YEAR 2
5. Council reviews SRTF Chair Update/Report at the Annual Meeting and makes recommendations (if applicable).	January
6. Council Chair, CCE Staff and SRTF representatives hold public hearings at various professional organizational meetings throughout the year to gather feedback and comments on the process and the CCE <i>Standards</i> .	February - November
7. Analysis and review conducted by CCE Staff and forwarded to the SRTF on the adequacy of the CCE <i>Standards</i> to evaluate the quality of education and relevancy to the training needs of students by means of survey or other appropriate mechanism.	July - December
8. SRTF Chair presents an update/report to the Council at the Semi-Annual Meeting (if necessary).	Prior to the Semi-Annual Meeting
9. SRTF reviews Council recommendations from the Annual and/or Semi-Annual Meetings,	February-November

feedback received, survey results and any other information provided and compiles Draft 1.	
10. SRTF Chair compiles a Report on Draft 1 from feedback received from various meetings for review by the Council at the Annual Meeting.	Prior to Annual Meeting
YEAR 3	YEAR 3
11. Council reviews SRTF Chair Report and Draft 1 at the Annual Meeting and makes revisions and recommendations (if applicable).	January
12. SRTF completes revisions and reviews recommendations from the Council and compiles Draft 2.	February – May
13. SRTF Chair presents an update/report to the Council at the Semi-Annual Meeting (if necessary).	July
14. Draft 2 of the revised Standards is posted to the website for public comment from all constituencies of interest with deadline date of November 1 (60 days).	September 1
15. SRTF reviews recommendations from the Council, feedback received from meetings with various professional groups and completes Draft 2.	December
16. SRTF Chair compiles a Report on Draft 2 from feedback received from various meetings for review by the Council at the Annual Meeting.	Prior to Annual Meeting
YEAR 4	YEAR 4
17. Council reviews SRTF Chair Report, Draft 2 and public comment at the Annual Meeting and makes revisions and recommendations (if applicable).	January
18. SRTF completes revisions and reviews recommendations from the Council; compiles Final Draft.	February – June
19. CCE Staff reviews, evaluates and make recommendations to the SRTF regarding USDE requirements and CCE policy and procedures.	February – June
20. SRTF Chair presents an update/report to the Council at the Semi-Annual Meeting.	July
21. The Final Draft of the revised Standards is posted to the website for public comment from all constituencies of interest with deadline date of October 1 (60 days).	August 1
22. SRTF reviews input received from public comment period and prepares Final Draft for review by the Council at the Annual Meeting.	November – December
23. SRTF Chair compiles a Report on the Final Draft for review by the Council at the Annual Meeting.	Prior to Annual Meeting
YEAR 5	YEAR 5
24. Council reviews SRTF Chair Report, Final Draft of the revised <i>Standards</i> and public comment for approval at the Annual Meeting. SRTF is dissolved.	January
25. CCE Staff completes Final Draft with any revisions by the Council from the Annual Meeting. New <i>Standards</i> posted to the website effective January of the following year.	TBA
26. CCE Staff posts announcement notifying all interested parties.	TBA
27. Review of CCE Bylaws and Manual of Policies conducted by CCE Staff regarding any new process implementations based on the new Standards with proposed revision(s) submitted to the Council for review at the Annual Meeting.	October
28. Review/Update of Accreditation Manual and Academy of Site Team Visitors Manual conducted by CCE Staff regarding any new process implementations based on the new Standards.	December
YEAR 6	YEAR 6
29. Council reviews/approves proposed revisions to CCE Publications at the Annual Meeting.	January
30. The Council conducts training for the DCPs and the Academy of Site Team Visitors regarding any new process implementations and the new <i>Standards</i> .	January - December
YEAR 7	YEAR 7
31. The Council continues training for the DCPs and the Academy of Site Team Visitors regarding any new process implementations and the new <i>Standards</i> .	January – December
YEAR 8	YEAR 8
32. CCE Staff gather feedback regarding the CCE Standards from DCPs and Academy of Site Team Visitors of recent site visits.	January – December
YEAR 1	YEAR 1
33. Process begins again (as outlined in Year 1 above) with the appointment of a new Standards Review Task Force by the Council Chair following the Annual Council Meeting.	January

CCE Policy 23 Authority, Responsibility and Action Regarding CCE Standards (cont.)

If the agency's Standards are no longer in compliance with USDE or CHEA requirements/criteria or determined to be confusing or lacking clarity, the Council has the authority to revise the *Standards* outside the normal process as outlined in the above table. The Council must then provide a written revision of the affected portion of the *Standards* only and the revision shall be disseminated and posted to the CCE website for at least 60 days to allow all constituencies of interest an opportunity to submit public comments for review by the Council prior to approval.

Approved: 2/2/91

Revised: 11/21/91, 11/19/92, 1/18/97, 1/13/02, 8/28/02, 1/12/03, 1/11/04, 1/8/05, 1/22/06,
1/20/07, 7/14/07, 3/8/09, 1/17/10, 1/13/12, 1/10/14, 7/11/14, 7/11/15, 7/14/17

CCE Policy 24 Authority, Responsibility and Action Regarding CCE Bylaws

Authority and Responsibility. Overall responsibility and authority for The Council on Chiropractic Education (CCE) *Bylaws* resides with the CCE Council. All policy statements must be consistent with the *CCE Articles of Incorporation, Bylaws and Standards*.

Classification and Maintenance. CCE *Bylaws* represent the rules adopted by the organization for its governance and the regulation of its affairs.

Creation, Revision and Deletion. Proposed Bylaw actions may be initiated by any Councilor, or CCE Administrative Staff member, through the CCE President. Bylaws actions recommended are subject to ratification (final approval) by a 2/3 vote of the CCE Council before such actions are implemented.

Procedures for Submission of changes to the CCE Bylaws. Proposals for all *Bylaws* revisions must be submitted on approved forms to the CCE Administrative Office no later than ninety (90) days before any regular or special Council meeting at which Council action will be taken.

Proposed revisions will be coordinated through the CCE Administrative Office as follows:

Bylaws revision Activity	Deadline Date *
1. Call for Bylaw revision proposals disseminated to the CCE Councilors.	30 days prior to deadline date
2. Proposed revisions due to the CCE Administrative Office, via email, and submitted on approved forms.	90 days prior to Council meeting
3. CCE Administrative Office prepares and forwards proposals to the Council Executive Committee (CEC).	10 business days after deadline date
4. CEC completes its review of all proposals and forwards its recommendations to the CCE Administrative Office.	No later than six (6) weeks prior to the Council Meeting
5. Proposed revisions and CEC recommendations are prepared by the CCE Administrative Office and disseminated electronically to all Councilors for review prior to the Council meeting.	Four (4) weeks prior to the Council Meeting
6. CCE Council takes action at its meeting. A 2/3 vote of all Councilors is required for any <i>Bylaws</i> revision.	TBA
7. CCE President notifies CCE Members and Councilors regarding any Bylaws revision(s) and posts the new edition on the CCE website for their information.	Four (4) weeks after the Council Meeting
8. CCE President submits changes to USDE (in accordance with CFR 602.27, if applicable) and notifies CCE distribution lists for National & State Professional Organizations, DCP Accreditation Liaisons, and Academy of Site Team Visitors that the new edition of the CCE Bylaws is posted on the CCE website for their information.	Six (6) weeks after the Council Meeting

* Any date that falls on a weekend or holiday automatically moves to the next business day.

Approved: 1/11/04

Revised: 1/8/05, 7/14/07, 3/17/08, 3/8/09, 1/17/10, 1/13/12, 1/11/13, 1/12/18

CCE Policy 25 Authority, Responsibility and Action Regarding CCE Policy

Authority and Responsibility. Overall responsibility and authority for The Council on Chiropractic Education (CCE) policy matters resides with the CCE Council. All policy statements must be consistent with the CCE *Articles of Incorporation, Bylaws* and *Standards*. Operational guidelines approved by the Council and the Council Executive Committee may not conflict with CCE *Bylaws* or *Policies*.

Creation, Revision and Deletion. Proposed policy actions may be initiated by any CCE Member Representative, Councilor, or CCE Administrative Staff member, through the CCE President. To insure that policy actions recommended are consistent with the CCE *Bylaws, Standards* and/or the policy framework of the CCE Council, all proposals are subject to ratification (final approval) by a majority vote of the CCE Council before such actions are implemented.

Procedures for Submission of changes to the CCE Policies. Proposals for all *Policies* revisions must be submitted on approved forms to the CCE Administrative Office no later than sixty (60) days before any regular or special Council meeting at which Council action will be taken.

Proposed revisions will be coordinated through the CCE Administrative Office as follows:

Policy revision Activity	Deadline Date *
1. Call for proposed revision to the Policies disseminated to the CCE Members and Councilors.	30 days prior to deadline date
2. Proposed revisions due to the CCE Administrative Office, via email, and submitted on approved forms.	60 days prior to Council Meeting
3. Proposed revisions are prepared by the CCE Administrative Office and disseminated electronically to all Councilors for review prior to the Council meeting.	Four (4) weeks prior to the Council meeting
4. CCE Council takes action at its meeting. A majority vote of all Councilors is required for any <i>Policy</i> revision.	TBA
5. CCE President notifies CCE Members and Councilors regarding any Policy revision(s) and posts the new edition on the CCE website for their information.	Four (4) weeks after the Council meeting
6. CCE President submits changes to USDE (in accordance with CFR 602.27, if applicable) and notifies CCE distribution lists for National & State Professional Organizations, DCP Accreditation Liaisons and Academy of Site Team Visitors that the new edition of the CCE Manual of Policies is posted on the CCE website for their information.	Six (6) weeks after the Council meeting

* Any date that falls on a weekend or holiday automatically moves to the next business day.

Approved: 1/18/97

Revised: 1/13/02, 1/12/03, 1/11/04, 1/22/06, 7/14/07, 3/17/08, 3/8/09, 1/17/10, 1/13/12, 1/11/13, 1/12/18

CCE Policy 29

CCE Election Processes

In the conduct of CCE elections for seats on the Council nominations shall be solicited and slates of candidates formed in accordance with provisions of the CCE *Bylaws*. To ensure clarity and effectiveness in CCE election processes and possibly in other voting actions, the following procedures shall be observed.

1. Call for Nominations

CCE shall release a timely call for open seats on the Council. The President will establish a list of preferred attributes, experiences and competencies requested of candidates for each seat. This list shall be included in the call for nominations.

2. Credentialing Process For Possible Candidates

The nominations and credentials of all nominees shall be collected by CCE staff for review of applicable eligibility requirements.

3. Number Of Candidates Per Open Seat

The CCE staff will forward all eligible (CCE Bylaws, Section 6.02) Category 1, 2, 3, 4 & 5 nominees to the ballot. A majority vote of all Members is required to select individuals that will serve as Category 1 & 2 Councilors. A majority vote of all Councilors is required to select individuals that will serve as Category 3, 4 & 5 Councilors.

In the case when there is not a candidate with a majority vote, the candidates receiving the most votes (but less than a majority) will be placed in a runoff election with a minimum of two (2) candidates per open seat. The candidate receiving the highest number of votes in the runoff election shall be declared elected to the seat. Such a process will be continued as necessary until all seats are filled; consistent with the requirements in CCE Bylaws, Section 5.04(b)(2) for Category 1 & 2 nominees.

4. Majority Vote and Requirement To Vote On All Seats

A "majority vote" means a candidate must receive the majority vote of all Members or of all Councilors in an election for the open seat. The number of votes cast by an elector must equal the number of contested seats or the entire ballot cast by that elector is invalid.

5. Voting Process

The ballot form will not identify the individual voting and will be submitted in an unmarked transmittal envelope or anonymous electronic voting platform. All results will be validated by two (2) CCE staff members or as designated by the CCE President.

6. Determination of a Winner In The Case Of A Tied Vote

In the case of a tied vote for a seat on the Council where one of those involved in the tie is an incumbent candidate, the incumbent shall be declared the elected. If neither candidate is an incumbent, the head of the body (Council Chair) shall review the qualifications of both candidates and shall select the individual to be seated.

CCE Policy 29

CCE Election Processes (cont.)

In the case where the Council Chair is also a voting representative of the "Members" of the Corporation, and voted in the election resulting in the tied vote, the Council Chair shall defer to the Associate Chair, to select the individual to be seated. In the case where both the Council Chair and Associate Chair are voting representatives of the "Members" of the Corporation, the Council Chair shall defer to the Treasurer to make the selection.

7. Seating of Councilors with Varying Terms of Service in Open Seats

Category 1 & 2

In the case when more than one (1) open seat is available with varying terms of service, the CCE Administrative Office staff will forward the names of the newly elected Councilors and the open seats to the Members for a vote on placement in the respective seats. If after 30 days from the distribution of the information a majority cannot be reached, then the CCE Administrative staff will request the preference from the newly elected Councilors. If there is no preference, the Council will determine how the seating will occur.

Category 3, 4 & 5

In the case when more than one (1) open seat is available with varying terms of service, the CCE Administrative Office staff will request the preference from the newly elected Councilors. If there is no preference, the Council will determine how the seating will occur.

Approved: 1/13/02

Revised: 1/12/03, 1/11/04, 1/20/07, 3/17/08, 3/8/09, 1/14/11, 7/12/13, 1/9/15, 7/11/15,
1/12/18

CCE Policy 34

Evaluation and Listing of Accreditation Status for DCPs offered at more than a Single Location

In the case where a DCP offers the full doctor of chiropractic degree program or selected studies toward the degree program at more than one location, the Council will evaluate the operations at all locations as part of a single accreditation action. In these circumstances, the Council will decide and list accreditation status as a singly accredited DCP, regardless of the number of locations at which such offerings are provided.

Approved: 9/20/01

Revised: 1/12/03, 3/8/09, 1/17/10

CCE Policy 40 File Management, Release of Information and Privacy

Authority

The CCE President, as stipulated by the CCE *Bylaws*, is the records custodian for the CCE Administrative Office. Original files may not be removed from the Administrative Office for any reason.

Access, Retention & Disposition

Records are created or received in the course of business and contain information related to the organization, functions, policies, decisions, procedures, operations, or other official activities of the agency. Therefore, access to CCE files is limited to current Councilors, CCE Administrative Office Staff or U.S. Department of Education (USDE) and Commission for Higher Education Accreditation (CHEA) officials for recognition purposes.

Disposition and retention of the CCE files is in accordance with the CCE Administrative Office File and Records Management Plans and may include paper copy (temporary) and electronic versions. Disposition and retention of the records is mandated by statute or agency or other Federal regulations, directives, policies and procedures. CCE maintains complete and accurate accreditation records of, at least, the last full accreditation review of each program, including on-site evaluation team reports, program's responses to on-site reports, periodic review reports, any reports of special review conducted by CCE between regular reviews, and the program's most recent self-study. CCE maintains all accreditation decision letters issued by the Council to the programs, indefinitely.

Release of Information

Every agency is legally required to manage its records; they must be managed properly for the agency to function effectively and to comply with Federal laws and regulations. Records are the evidence of the agency's actions. The CCE Administrative Office maintains all records within the jurisdiction of CCE operations in accordance with the CCE Administrative Office File Plan and Records Management Plan. All files are updated on an annual basis by calendar and fiscal years.

To protect the confidentiality of CCE Councilors, CCE Administrative Office Staff and CCE-Accredited Doctor of Chiropractic Programs (DCPs), and to adhere to CCE policies and procedures and maintain compliance with U.S. Department of Education requirements/criteria all files designated, or with relationship to, accreditation activities are not open to the public for release. The CCE President, as records custodian, is the sole authority for release of any of the aforementioned documents to comply with legal and/or other Federal/State regulations, directives, policies or procedures.

Copies of CCE records may be requested from the CCE Administrative Office, in person or in writing, by completing the CCE Release of Information Form, located on the CCE website or obtaining a form from CCE Administrative staff, in accordance with this policy and at a cost fixed by the CCE President. If a written request includes the date of request, name of requester, information required, reason for request and date records are needed, the CCE form is not required. The CCE President must approve all requests before copies of records can be released. A log indicating the date of request, the name of the individual requesting the record(s), the specific document(s) copied, the date approved by the CCE

CCE Policy 40 File Management, Release of Information and Privacy (cont.)

President and the cost of the transaction, if applicable, shall be maintained for the last five (5) years in accordance with the CCE Administrative Office File Plan.

The CCE Administrative Office Staff shall have access to all files during the course of normal business, while adhering to the rules and requirements of confidentiality, policy and procedure.

Privacy

CCE maintains the privacy of files in accordance with CCE Bylaws and federal/state requirements and/or laws. The source documents for such requirements are listed in the CCE Administrative Office Records Management Plan and also in accordance with CCE policies and procedures.

Responsibilities and Confidentiality

CCE has specific legal requirements for records management which include:

- Preserving records that contain adequate and proper documentation of the organization, functions, policies, decisions, procedures and essential transactions of the agency and designed to furnish the information necessary to protect the legal and financial rights of the agency and of persons directly affected by the agency's activities.
- Establishing and maintaining an active, continuing program for the economical and efficient management of the records of the agency.
- Establishing safeguards against the removal or loss of records and making requirements and penalties known to agency officials and employees.
- Notifying the CCE President of any actual, impending or threatened unlawful destruction or release of records and assisting in their recovery.

A DCP may waive its right of confidentiality by express or implied consent. A DCP that makes public any part of its confidential Council materials shall be deemed to have waived its right of confidentiality for those materials by implied consent. The DCP self-study report shall be considered the property of the DCP and the DCP may distribute the report (or its contents, accurately and fairly reported) as it chooses. Such distribution shall not be considered a waiver of confidentiality by implied consent.

Release of any portion of any document other than the self-study report shall constitute a waiver of confidentiality regarding any matters addressed in the released document, and the Council shall be free to address the matter as appropriate to the situation.

The Council Chair or the Council itself shall determine if a DCP has waived its right of confidentiality and the Council Chair shall designate the CCE Councilor, CCE Administrative Office Staff or agent who shall release such information as is proper and appropriate. Violation of this policy shall subject the above listed individuals to such disciplinary action as the Council may deem appropriate.

CCE shall disclose only information regarding CCE Administrative Office Staff relating to the position held, dates of employment and, if requested by the appropriate agency, benefits information. No other human resource and/or payroll information shall be disclosed.

Approved: 2/02/91
Revised: 1/28/95, 1/13/02, 1/22/06, 3/8/09, 1/17/10, 7/9/21

CCE Policy 45 Council Executive Committee Elections

At the time for election, the Council Chair will call for nominations from the floor for each office, starting with the Chair. Those individuals not interested in being elected are to make that known prior to the nomination process.

Once nominations are closed, each councilor will use a ballot to vote among the candidates for the position. The same process will then be followed for election of the remaining Council Executive Committee positions, which include; the Associate Chair, Treasurer and the Councilor At Large. Ballots will be counted by the CCE President with a non-candidate observing.

Approved: 1/13/02
Revised: 1/17/10, 1/11/13

CCE Policy 46

Regard for Decisions of States and Other Accrediting Agencies

If a state or another recognized accrediting agency issues a sanction against a program/institution applying for or accredited by CCE, the program/institution will be reviewed by the Council to determine whether actions taken by that agency will affect the current accreditation status or application. The Council may conduct a special site visit, request reports or further information, require an appearance by the representatives at a Council meeting, and/or take any other such measures as the Council deems necessary to ensure the program/institution maintains compliance with the requirements for accreditation regarding the CCE Standards and/or policies.

1. Except as provided in paragraph 2 of this section, the Council may not grant initial or reaffirmation of accreditation to an institution, or a program offered by an institution, if the Council knows, or has reasonable cause to know, that the institution is the subject of--

(a) A pending or final action brought by a State agency to suspend, revoke, withdraw, or terminate the institution's legal authority to provide postsecondary education in the State;

(b) A decision by a recognized accrediting agency to deny accreditation or preaccreditation;

(c) A pending or final action brought by a recognized accrediting agency to suspend, revoke, withdraw, or terminate the institution's accreditation or preaccreditation; or

(d) Probation or an equivalent status imposed by a recognized accrediting agency.

2. The Council may grant initial or reaffirmation of accreditation to an institution or program described in paragraph 1 only if it provides to the U.S. Department of Education, within 30 days of its action, a thorough and reasonable explanation, consistent with its standards, why the action of the other state or accrediting agency does not preclude the Council from granting initial or reaffirmation of accreditation.

3. If the Council learns that an institution it accredits, or an institution that offers a program it accredits, is the subject of an adverse action by another recognized accrediting agency or has been placed on probation or an equivalent status by another recognized agency, the Council must promptly review its accreditation of the institution or program to determine if it should also take adverse action or place the institution or program on probation or show cause.

4. The Council must, upon request, share with other appropriate recognized accrediting agencies and recognized State approval agencies information about the accreditation status of an institution or program and any adverse actions it has taken against an accredited institution or program.

Approved: 2/02/91

Revised: 1/28/95, 1/13/02, 5/16/06, 1/20/07, 3/8/09, 1/11/13, 7/9/21

CCE Policy 56 Student Performance Disclosure, Thresholds and Outcomes

In keeping with the CCE Accreditation Standards requiring public disclosure of student performance, DCPs must disclose up-to-date results of student performance on national board examinations and completion rates on the program website. Reporting will be posted on one of the following website pages: Home page, Admissions, Academics, Prospective Students, or equivalent page using direct links. All performance data must be posted by August 1 each year using the formats described below.

NBCE LICENSING EXAMS

Each program shall post annually the overall weighted average of the four (4) most recent years' NBCE Parts I, II, III, and IV Exam success rates. The DCP's may use the Canadian Chiropractic Examining Board (CCEB) Part C exam data in lieu of NBCE Part IV data. Students transferring from another accredited DCP will be included in this calculation.

The DCP shall annually post:

1. The total unduplicated number of graduates of the program who **attempted any or all** parts (Parts I, II, III and IV*) of the NBCE exams within six (6) months post-graduation;
2. The total unduplicated number of graduates of the program who successfully passed all parts (Parts I, II, III and IV*) of the NBCE exams within six (6) months post-graduation; and
3. The percentage of these graduates who successfully **passed all** parts (Parts I, II, III and IV*) of the NBCE exams within six (6) months post-graduation.

* or CCEB Part C data in lieu of NBCE IV data

The format required for publication as determined by the Council is provided in the following example:

NBCE Licensing Exam Success Rates

Calendar Year (Last 4 years)	Number of Graduates Attempting Any or All Parts (I, II, III, IV*) of NBCE Exams within six (6) months post-graduation	Number of Graduates Passing All Parts (I, II, III, IV*) of NBCE Exams within six (6) months post-graduation	Percentage of Graduates Passing All Parts (I, II, III, IV*) of NBCE Exams within six (6) months post-graduation
2011	321	268	83%
2012	344	306	89%
2013	299	259	87%
2014	315	287	91%
Totals	1279	1120	88%

*or CCEB Part C data in lieu of NBCE Part IV data

Weighted Average

DC DEGREE COMPLETION RATES

Each program shall post annually the overall average of the two (2) most recent year's completion rate, calculated at 150% of the normal completion time, for the doctor of chiropractic program. Students transferring from another accredited DCP will be included in this calculation.

CCE Policy 56 Student Performance Disclosure, Thresholds and Outcomes (cont.)

The DCP shall annually post:

1. In the heading, provide the name of the DCP and the normal length of the program, e.g., 10 trimesters or 14 quarters
2. Column A - Adjust to reflect the program’s calendar, i.e., trimesters or quarters
3. Column B - Provide the number of students that matriculated for each entrance term **
4. Column C - Adjust the column header to reflect 150% of the normal completion time, e.g., 21 quarters for a 14 quarter program
5. Column D - Provide the number of students in Column A that graduated by term in Column C
6. Column E – Calculate Column D divided by Column B
7. Totals - Provide the sum of Column B, sum of Column D, and the overall 2-year completion rate

NOTE: The two most recently completed academic years of data must be submitted based on the DCPs calendar. Eight data points should be entered for quarterly systems and six data points should be entered for trimester systems.

** Only students in the following categories may be omitted from Column B, if any of the following occur after matriculation:

1. Student withdrawal/leave of absence due to military deployment orders;
2. Program approved withdrawal/leave of absence due to a documented serious health condition, illness or injury;
3. Death of the student;
4. Student transfers to another accredited DCP; or,
5. Student does not persist to the second term.

The format required for publication as determined by the Council is provided in the following example:

DC Degree Completion Rates

Name of the Doctor of Chiropractic Program (DCP) Normal Length of Program: 14 Quarters				
Column A	Column B	Column C	Column D	Column E
Entrance Term	# of Students Matriculated in Entrance Term **	Term 21 Quarters After Entrance Term	# Students in Column A that Graduated by Term in Column C	Completion Rate at the 150th Percentile
Summer 2010	79	Summer 2015	71	89.9%
Fall 2010	78	Fall 2015	69	88.5%
Winter 2010	74	Winter 2015	63	85.1%
Spring 2011	80	Spring 2016	74	92.5%
Summer 2011	79	Summer 2016	69	87.3%
Fall 2011	74	Fall 2016	63	85.1%
Winter 2011	76	Winter 2016	71	93.4%
Spring 2012	80	Spring 2017	73	91.3%
TOTALS	620		553	89.2%

CCE Policy 56

Student Performance Disclosure, Thresholds and Outcomes (cont.)

THRESHOLDS

In keeping with the CCE Accreditation Standards requirements concerning student outcomes, the following are established as thresholds. Performance below these thresholds, as derived from data obtained by the Council, will indicate the need for further review and action as determined by the Council.

Performance on the NBCE Part I, II, III, & IV Examinations*

The overall weighted average of the four (4) most recent years' NBCE Parts I, II, III, and IV* Exam success rates must not be less than 80%.

Completion of the D.C. Degree Program

The two-year average completion rate, calculated at 150% of the time normally designated for completion of the DC degree, must be at least 70%.

Approved: 1/14/01

**Revised: 1/12/03, 1/11/04, 1/20/07, 3/8/09, 1/17/10, 7/11/14, 1/9/15, 7/15/16, 7/14/17,
1/10/20**

CCE Policy 64 Complaints

This policy addresses the requirements and procedures for filing a complaint against a Council on Chiropractic Education (CCE) accredited Doctor of Chiropractic Program or personnel representing the CCE.

Statement of Purpose

The Council on Chiropractic Education (CCE) recognizes the value of information provided by students, employees, and others in determining whether a program's performance is consistent with the CCE Accreditation Standards for obtaining or maintaining accreditation. The CCE's interest is also to ensure that programs maintain appropriate grievance procedures and standards of procedural fairness and that the procedures are applied appropriately and consistently.

The procedures for the review of complaints involving programs enable the Council to address possible violations of its *Standards, Principles, Processes & Requirements for Accreditation*, and policies or procedures, as well as to address possible violations of a program's own policies and procedures, if related to the *Standards*.

Because the CCE's complaint procedures are for the purpose of addressing any significant noncompliance with the *Standards, policies, or procedures*, the procedures are not intended to be used to involve the CCE in disputes between individuals and programs, or cause the CCE to interpose itself as a reviewing authority in individual matters of admission, grades, granting or transferability of credits, application of academic policies, fees or other financial matters, disciplinary matters or other contractual rights and obligations. Nor does the CCE seek redress on an individual's behalf. Under no circumstances does the CCE respond to, or take action on, any complaint or any allegation that contains defamatory statements. Generally, the CCE will not serve as a grievance panel when the outcomes of programmatic/institutional grievance or appeal processes are unsatisfactory to the complainant.

The CCE expects individuals to attempt to resolve the issue through all means available to the complainant, including following the program's own published grievance procedures, before submitting a complaint to the CCE. Therefore, the CCE's usual practice is not to consider a complaint that is currently in administrative proceedings, including programmatic/institutional proceedings, or in litigation. However, if there is substantial, credible evidence that indicates systemic problems with an accredited program, the CCE may, at its discretion, choose to proceed with the review.

Responsibilities of Programs/Institutions

The *CCE Accreditation Standards* state that programs must maintain; policies and procedures that equitably address student complaints and grievances, student conduct issues and academic standing reviews, documented by records of hearings and proceedings related to such matters. (Section 2.F)

The CCE also requires, in accordance with federal regulations (34 CFR § 602.16), that each program maintains a record of student complaints received by the program that are assessed by the CCE as part of the program's site visit evaluation for initial or continued accreditation.

CCE Policy 64 Complaints (cont.)

Procedures for Filing a Complaint against a Program

An individual may make an inquiry regarding complaint procedures or about issues and concerns that could be considered complaints; however, the CCE's response and its obligations to meet the specific timetables outlined in these procedures will begin only after the complainant submits a properly completed formal written complaint that meets the requirements set forth below.

In order to be considered, a formal complaint must be submitted in writing, signed, dated and sent via email to the: Council on Chiropractic Education at the following address, cce@cce-usa.org, with the title "COMPLAINT" included in the subject line of the email. The CCE will neither entertain complaints that are not in writing or which are anonymous. In addition, the CCE will not act on complaints submitted on behalf of another individual or complaints forwarded to the CCE. The information submitted must include:

- a. A statement describing the complaint in the clearest possible terms.
- b. The section(s) of the *CCE Accreditation Standards* alleged to have been violated and the time frame in which the significant lack of compliance is alleged to have occurred.
- c. A clear and concise written description of the evidence upon which the allegation is based. (Materials and documentation used to support a complainant's allegations should be limited to and directly related to the reported complaint.) The evidence should state relevant facts and document and support the allegation that the program is in violation of the standards referenced in the complaint.
- d. Evidence that the program's formal grievance (or complaint) process has been exhausted. A description of the action taken by the program to date and a copy of the program's response to the complainant as a result of prescribed procedures.
- e. An acknowledgment that CCE staff may send a copy of the complaint to the President/CAO of the program.
- f. Full disclosure about any other external channels the complainant is pursuing, including legal action.

Once the formal written complaint is submitted, the CCE and the complainant are responsible for the following:

1. The CCE will acknowledge a formal written complaint within 15 business days of its receipt.
2. Within 60 calendar days after acknowledging receipt of the complaint, the President and/or Council Executive Committee (CEC) will review the complaint and its documentation and determine (1) whether it is within the scope of CCE policies and is accreditation related, (2) if there is adequate documentation in support of the allegations, and (3) whether the complaint raises significant questions about the

CCE Policy 64 Complaints (cont.)

program's compliance with the *Standards*. The President or CEC will inform the complainant regarding the outcome of this review to include one of the following:

- a. The complaint will not be processed further because it is not within the scope of CCE policies and jurisdiction or there is inadequate documentation to raise questions concerning the program's compliance with the *Standards*.
- b. Where appropriate, a resolution is suggested to the complainant and/or the program.
- c. The complaint has sufficient substance to warrant further review. In this case, the CCE will make every effort to expedite the investigation; however, the time required to conduct the investigation may vary considerably depending on the circumstances and nature of the complaint. When a complaint is further investigated, a copy of the complaint will be forwarded to the program's/institution's chief executive officer who will be asked to respond to the CCE within 20 business days. Following the review, the complainant and program involved will be notified regarding one of the following:
 - (1) The complaint will not be processed further because there is insufficient evidence of non-compliance. The decision of the President or the CEC is final.
 - (2) There appears to be sufficient evidence of or the President or CEC are unable to determine compliance, then one of the following actions may be taken:
 - (a) Authorize a Special Committee to visit the program. The Special Committee will examine documents and interview program personnel to analyze and make a judgment about compliance, and prepare a report. The report of the committee will be forwarded to the Council for review and action at the next regular meeting of the Council. Following that meeting, the complainant and program involved will be notified of the decision of the Council.
 - (b) Forward the complaint and related documentation directly to the Council for review and action. Following their review, the complainant and program involved will be notified of the decision of the Council.
 - (c) Include the complaint for evaluation by a site team during an upcoming scheduled visit to the program. Following the review of the site visit report, the complainant and program involved will be notified of the decision of the Council.
 - (d) Request additional information. After reviewing the additional information, the President or CEC may decide to take any of the actions as described in (1), (2)(a), (2)(b), or (2)(c) above.

CCE Policy 64

Complaints (cont.)

For items (2)(a), (2)(b), or (2)(c) above, the decision of the Council is final unless the disposition is one that is otherwise appealable as stated in CCE Policy 8, Appeals of Decisions by the Council.

Individual complaints will be retained in the CCE files by program. Should a number of individual complaints suggest a pattern of concern which may evidence a lack of compliance with the *Standards* that was not evident from any one individual complaint, the Council may renew its consideration of the matter for whatever action may be appropriate.

Complaints against the Council on Chiropractic Education

Complaints against the CCE are limited to complaints regarding the agency's standards, policies, procedures, and staff or any other CCE representative.

The procedures for filing a complaint are as follows:

1. If the complaint is against a CCE staff member, the following procedure applies.
 - a. The individual should submit a written complaint to the CCE President that includes a description of the specific complaint accompanied by documentation supporting the allegation.
 - b. The President will acknowledge the complaint within 10 business days of its receipt.
 - c. Following review, the President will inform the complainant of action within 30 days of receipt of the complaint.
2. If the complaint is against a Councilor or an agency representative, such as an on-site visiting team member, the following procedure applies.
 - a. The individual should submit a written complaint to the CCE President that includes a description of the specific complaint accompanied by documentation supporting the allegation.
 - b. The President will acknowledge the complaint within 10 business days of its receipt, and;
 - 1) Forward to the Council Executive Committee (CEC) to investigate and make a decision if the complaint is not pertaining to a member of the CEC, or
 - 2) Forward to the Council to investigate and make a decision if the complaint is pertaining to a member of the CEC.

In both instances, adherence to conflict of interest policies is required and the investigation may include review of the complaint with the individual(s) named as well as with the complainant.

CCE Policy 64 Complaints (cont.)

- c. Following review, the President will inform the complainant of action within 45 days of receipt of the complaint.
3. If the complaint is against the CCE President, the following procedure applies.
 - a. The individual should submit a written complaint to the Council Chair that includes a description of the specific complaint accompanied by documentation supporting the allegation.
 - b. The Council Chair will acknowledge the complaint within 20 business days of its receipt and will designate a committee composed of members of the Council Executive Committee and/or the Council to investigate the complaint and recommend action to the Chair. The investigation may include review of the complaint with the CCE President as well as with the complainant.
 - c. The Council Chair will review the recommended action and inform the complainant and CCE President of action within 45 days of receipt of the complaint.

In all cases, concern that action was not in accord with the complainant's expectations is not in and of itself cause for review of the complaint.

Distinction between Submitting Third-Party Comments and Filing Formal Complaints

The CCE is interested in ensuring that programs maintain *ongoing* compliance with CCE Accreditation Standards and policies *outside the program's scheduled formal accreditation status review* and that programs maintain appropriate grievance procedures and standards of procedural fairness that are applied consistently. Therefore, if an individual has evidence of a program's non-compliance with CCE Accreditation Standards, policies, or procedures, the individual should inform the CCE using the procedures set forth in Policy 64.

Third-party comments are submitted by the public *at the time of a program's formal accreditation status review* for the purpose of informing the CCE regarding ongoing commitment to compliance with the CCE Accreditation Standards and policies. Therefore, if an individual decides to address a program's compliance with the *Standards* at the time of the program's formal accreditation status review, he/she should reference CCE Policy 68, Provision of Opportunity for Third-Party Comment Regarding Accreditation Decisions.

Approved: 1/13/02
Revised: 3/8/09, 1/17/10, 1/11/13, 7/9/21

CCE Policy 68 Provision of Opportunity for Third-Party Comment Regarding Accreditation Decisions

The Council will ensure appropriate opportunity for third-party comment regarding potential accreditation actions. The Council shall publish a current list that identifies those programs having accredited status. This list shall identify the current accreditation status of all such programs, and shall identify the anticipated date for the next regularly scheduled accreditation review. This listing shall be posted to the official CCE website for review by the organizations representing all relevant constituencies in the chiropractic profession.

The listing shall include an invitation for third party comment regarding the accredited status of any program and drawing attention to the scheduled dates for Council accreditation actions. By publishing the listing on the official CCE website, and also making these materials available upon request at any time, the Council will insure ample notice and time for third-party comment well in advance of scheduled Council status actions.

To help insure timely attention to any third-party comment, the third-party comment must be submitted at least six (6) months prior to the scheduled status decision, no later than January 31 for a July Status Review Meeting and no later than July 31 for a January Status Review meeting, thus enabling Council attention to such comment prior to normally scheduled site visits. In further efforts to ensure such opportunity, the described list of accredited programs and the described third party comment opportunity will be published on the official CCE website and available to the general public.

The Council will maintain a record of the above-specified actions as well as any received third-party comment regarding accreditation actions, and will document steps taken by the Council in response to such received comment.

Approved: 5/09/01
Revised: 1/12/03, 1/20/07, 3/8/09, 7/14/17

CCE Policy 73 Financial Actions

Financial accounting for The Council on Chiropractic Education (CCE) shall be on an accrual basis.

Information about all CCE financial activities shall be available to CCE Councilors.

Capitalization

The CCE shall capitalize and depreciate assets costing \$2,500 or more, and having future economic benefit for the longer of one operating cycle or year, in accordance with Generally Accepted Accounting Principles (GAAP). The depreciation rate will be calculated using the straight-line method and the time table will be based on the Arizona Municipality Capital Assets.

Drawing Checks

All checks must be approved by the CCE President, Vice President or a member of the Council Executive Committee.

All checks in excess of \$2,500 must have two signatures, except for payroll checks and transfer of funds from one CCE banking account to another. All payments exceeding \$2,500 will be copied and included in the monthly financials.

Budgeting

Councilors shall approve an annual budget each fiscal year.

The budget shall include sufficient administrative staff and financial resources to implement and maintain effective accrediting procedures, and shall be based on the experience of previous expenditures as well as anticipated needs. The total financial reserves shall be maintained at approximately 150% of the operating expenses of the previous year.

Amounts exceeding 150% of the operating expenses shall be earmarked for unanticipated legal expenses. The portion of reserve funds earmarked for unanticipated legal expenses shall not exceed 150% of the operating expenses of the previous year.

Financial reserves in excess of 150% of the operating expenses of the previous year may be utilized to fund the acquisition of capital assets. Financial reserves in excess of 300% of the previous year's operating expenses may be utilized to support current operating expenses.

For purposes of determining financial reserves, operating expenses shall not include those expenses that are reimbursed by member institutions for site visits.

Withdrawal of funds from any of these reserves shall not be made without prior approval of the Council Executive Committee (CEC) and notification to the Council.

Once a budget has been approved, the CCE President is empowered to administer the budget according to budgetary guidelines.

CCE Policy 73

Financial Actions (cont.)

Auditing

At the end of each fiscal year, the financial statements of the CCE shall be audited in accordance with generally accepted accounting principles (GAAP) by a certified public accountant or firm. Details regarding cash and cash equivalents (as well as investment cost basis) shall be included in footnotes to the financial statements. The CCE Staff shall serve as the primary liaison with the independent auditors with oversight by the Council Audit Committee (CAC). Final review of the audit by the committee, permits the CCE Staff to process the Form 990 accordingly. Copies of the audit and Form 990 will be provided to the Council at the next regularly scheduled Council meeting. The CAC shall review and recommend selection or re-appointment of the independent auditing agency, to include whether rotation of the lead auditor(s) is necessary in accordance with GAAP. Such auditor or firm shall submit the audit following the end of each fiscal year.

Borrowing Power

Contracts

The Council may authorize any officer(s) or agent(s) to enter into any contract or execute or deliver any instrument in the name of and on behalf of the CCE, and any such authorization may be general or confined to specific instances. In the absence of other designation, all such contracts and instruments shall be executed in the name of the CCE by the Council Chair or one of the other officers, and when so executed no other party to such instrument or contract, or any third party, shall be required to make any inquiry into the authority of the signing officer or officers.

Loans

No indebtedness shall be contracted on behalf of the CCE and no evidences of such indebtedness shall be issued in its name unless authorized by, or under the authority of, a resolution of the CCE Council. In accordance with CCE *Bylaws*, Article IX, Section 9.03.

Lending or Disposal of Capital Assets

Loan or temporary assignment of capital assets to members of the CCE for work purposes is to be approved by the CCE President and reported to the CEC.

Arrangements for gift, sale or trade of capital assets shall be documented, with approval by both the CEC and the individual or organization involved, to ensure clear understanding of the terms of disposition of the asset. Arrangements of this type are to be acted upon by the CEC and documented in meeting minutes.

Approved: 2/2/91

Revised: 1/13/02, 1/8/05, 7/15/06, 3/17/08, 3/8/09, 1/17/10, 1/14/11, 1/10/14, 7/11/14,
7/15/16, 1/12/18

CCE Policy 77 Fraud

Members of the CCE Administrative Office staff and Council must institute effective internal controls to avoid fraud. Adequate segregation of responsibilities is the most effective means of this action. The Council should assess fraud risk periodically and determine how fraud risk can be mitigated by identifying areas that could be susceptible to fraud and then establish controls to lessen the likelihood of fraud occurring in those areas. It presents a challenge to organizations and/or associations with small staffs, but the following guidelines and measures will greatly reduce the risk of fraud.

1. Requirement of two signatures on checks issued over \$2,500 (Reference: CCE Policy 73).
2. All checks must be kept under lock and key.
3. Ensure that employees are required to take vacation on a periodic basis. Most fraud is detected by accident or during interruption of work routines.
4. A high quality check stock should be used to prevent scanning capabilities.
5. Make sure the endorsement stamp includes the full legal name of the association (never just the acronym) and includes the bank name and account number.
6. Create an audit trail by maintaining a log of checks received.
7. Occasionally check the bank's records verifying authorized signers.
8. Maintain backup computer files in a secured location.
9. To the extent possible, cross-train employees in order for them to understand one another's responsibilities.
10. Use the services of an independent CPA. (Reference: CCE Policy 73).
11. Review bank statement transactions, verify payroll accuracy, review bank reconciliation's, test check approval procedures to ensure compliance and ensure authorized check signers sign checks. (Reference: Audit Committee).

If there is a substantiated allegation of fraud, the following steps should occur:

- The Council is immediately informed by the CCE President (or other party if the allegation is versus the President).
- Review of alleged fraudulent activity identified and assessment completed by the CCE Audit Committee.
- Actions implemented to resolve the allegation in a timely manner.
- If substantiated, take appropriate and consistent actions against violators (to include termination and/or legal prosecution if necessary).
- Assess how current procedures and controls may be improved/changed to reduce or eliminate future fraud risks or occurrences.
- Reinforce organization's values and expectations through appropriate communication.

Approved: 1/11/04
Revised: 1/20/07, 3/8/09, 1/17/10, 7/9/21

CCE Policy 88 Investments

The funds of The Council on Chiropractic Education (CCE) as a corporation shall be deposited in such depositories as may be approved by the CCE Council or the Council Executive Committee, but such depositing authority may be delegated by them to the CCE President.

Statement of Investment Objectives, Goals and Policy Guidelines

I. Philosophy and Objectives

CCE Councilors, ever mindful of their stewardship, have caused this statement to be prepared as a policy framework for a disciplined process that seeks to add value and minimize risk of the resources for The Council on Chiropractic Education (CCE).

Investment of the resources of the CCE is the responsibility of the Council Executive Committee. The Council Executive Committee implements investment objectives as established by the CCE Council, establishes policies, selects investment managers to implement established policies, and monitors the implementation and performance of the managers retained in support of the objectives and policies.

The resources are invested to maximize long-term investment return consistent with prudent levels of risk appropriate to management of such long-term funds. Management of the assets is designated to insure a total return (income plus capital change) necessary to preserve and enhance (in real dollar terms) the principal of the funds and at the same time, provide a dependable source of income for current operations and programs.

II. Diversification of Investments

In recognition of the prudence required of fiduciaries, reasonable diversification will be sought where possible. Experience has shown financial markets and inflation rates are cyclical and, therefore, control of volatility will be achieved through diversification of asset classes and selection of managers of diverse investment styles. Investment risks are considered within the context of the entire investment, and the need to sustain its long-term purchasing power.

III. Asset Allocation

Since the selection and weighting of asset classes is the primary determinant of investment return and volatility, asset choice will be carefully considered by the Council Executive Committee in accordance with a systematic allocation process derived from consultation with the investment advisor(s). Approved asset classes and policy target ranges are noted below:

	<u>Range</u>	<u>Index Benchmarks</u>
Equities	30-80%	S & P 500
Fixed Income	0-50%	Lehman Intermediate Government Corporate Bond Index
Cash Equivalents/Short Term	0-50%	30 Day Treasury Bill rate
Non-traditional/Alternative Mutual Funds	0-30%	Mutual Funds & ETFs

CCE Policy 88 **Investments (cont.)**

The fund is to be structured for long-term growth with a broadly diversified mix of asset classes and styles. The international and global fixed income segments are intended to reduce volatility and the funds' reliance on domestic financial markets.

The target for the actual asset mix will be reviewed by the Council Executive Committee annually, or more frequently as necessary.

The Council Executive Committee will review the segment asset allocations annually, and any changes in the allocations will be made after the meeting.

IV. Limitations and Restrictions

Limit holdings in any one stock or commodity to 3% and to 20% in any one diversified holding (such as mutual funds or ETF's); or holdings of 25% within any one industry, with the exemption of the US Government or its agencies.

The following categories of investments are not permitted for investment without the Council Executive Committee's written approval: (i) Unregistered or restricted stocks; (ii) Commodities, including gold, precious gems or currency futures; (iii) Private placement debt, except as may be positioned in a commingled fund which does not specifically emphasize private placements; (iv) Tax exempt securities, either state or federal; (v) Conditional sales contracts; (vi) Uncovered options; (vii) Short sales or margin purchases; (viii) Transferable certificates of participation in business trusts and limited partnerships; (ix) Securities of the investment managers or their respective parents, subsidiaries or affiliates; (x) Investments in companies doing business in material conflict with the philosophy and values of the Corporation; (xi) Securities in violation of state law; and (xii) Hedge funds.

Derivative instruments may not be used to leverage the investable assets of the portfolio, nor may they be used when they may change the risk characteristics otherwise permissible securities held in the portfolio.

Pooled funds that materially comply with these restrictions may be used, as long as areas of noncompliance are identified and disclosed to the Council Executive Committee.

V. Investment Consultant

The CCE may retain the services of an independent investment consultant for the purpose of assisting the Council Executive Committee in developing and then attaining the objectives of the fund. The consultant will assist in establishing objectives offering alternative models of asset allocation, identifying appropriate managers or funds, producing timely quarterly reports that monitor performance of individual managers against similar managers as well as performance of the entire Fund against its objectives and against other appropriate indices. The consultant will also provide consultation on revisions and modifications as appropriate.

CCE Policy 88 **Investments (cont.)**

VI. Investment Management

Investment managers will be appointed following a systematic search for those with demonstrated quality in the style desired. To optimize access to such managers, while minimizing management fees and transaction costs assessed to the fund, no-load mutual funds and pooled funds may be considered together with separate account management. Managers are given discretion to manage funds entrusted in accordance with the style for which they are employed provided they comply with the restrictions and limitations as may be determined by the Council Executive Committee from time to time {Article VIII, 8.07(a), 2&3}.

VII. Evaluation of Manager

The following criteria will be used to evaluate manager performance.

A. Performance Objectives for Active Management

Equity managers/fund(s) will be expected to achieve an annualized total rate of return over a three to five-year period which exceeds an appropriate market index rate of return by 1.0 percentage points compounded annually, net of costs and fees. Total return is defined as dividend or interest income plus realized and unrealized capital appreciation or depreciation at fair market value. Fixed income managers will be expected to exceed appropriate market indices by 0.50 percentage points, net costs and fees. Balanced managers will be expected to attain a blended objective reflective of their asset mix.

The managers/fund(s) will also be expected consistently to achieve a total rate of return, which is equal or above the meridian return in a universe of peers with comparable investment styles or portfolio objectives.

B. Investment Style

The managers/fund(s) will maintain a portfolio characterized by their respective traditional management styles and, if a change in such style is contemplated, the manager is required to make advance written notification to the Council Executive Committee.

C. Change in Objectives or Asset Allocation

A change in objectives or asset allocation strategy may require that funds be transferred between asset classes, to new asset classes, or among styles within asset classes. These changes may result in increases, decreases or elimination of funds under management by a specific manager.

VIII. Performance Measurement

Measuring manager progress against policy objectives, and for consistency in measuring performance against the total return objectives, performance will be reflected net of management

CCE Policy 88 Investments (cont.)

fees and transaction costs. When calculating return for the quarterly reports utilized for management purposes, returns will be stated before fees.

IX. Communication and Reporting

Where the fund is separately managed, the manager is responsible for free and open communication with the Council Executive Committee through the CCE President and the investment consultant in all significant matters pertaining to investment policies and management of Fund assets, including, but not limited to: (i) Major changes in the investment manager's investment outlook, investment strategy and portfolio structure; (ii) Any significant changes in the ownership, organizational structure, financial condition or senior personnel staffing of the investment manager's organization; and (iii) Quarterly transactions, evaluation and performance reports.

Quarterly evaluations of assets under management shall be supplied by the investment managers, in the form as may be requested by the Council Executive Committee and to include market valuations, industry segmentations, transaction registers, cash settlements, and similar reports. The report of fixed income and equities shall show inventories at cost, purchase date, market value and share or unit values at cost and market values. At reasonable times and at the direction of the Council Executive Committee, meetings shall be held with the manager(s) to discuss performance results, economic outlook, organizational changes and other pertinent matters. All documents, exhibits and other written material to be used during such conferences shall be submitted by the investment manager(s) at least five days in advance of the conferences.

All materials required of the manager(s) shall also be provided to the investment consultants. In addition, the manager(s) shall provide evidence of liability and fiduciary insurance and have its employees bonded unless otherwise exempted by law or governmental regulations.

X. Conflict of Interest

It is the policy of the Councilors to avoid conflicts of interest in its operations and in the selection of investment managers or funds. Therefore, the CCE President, members of the Council Executive Committee, or Council shall not have an ownership relationship with any manager or fund being considered. Similarly, the investment consultant shall have no financial relationship with any manager or fund serving the CCE.

XI. Spending Guideline/Limitations

The Council Executive Committee will continually review the liquidity needs of the CCE and will notify the investment consultant as soon as possible of any significant changes in anticipated needs for liquidity purposes.

Approved: 2/2/91
Revised: 1/24/98, 1/8/05, 7/15/06, 3/8/09, 1/17/10, 10/1/13

CCE Policy 94 Expenses, Honoraria and Stipends

I. Policy Statement

A. General

This is The Council on Chiropractic Education (CCE) statement of policy on reimbursement of incurred expenses, honoraria, and stipends applicable to the conduct of CCE business. This policy applies to individuals who are members of the CCE Council, committees and/or task forces, the CCE Administrative Office Staff, and Academy Site Team members; plus consultants or other individuals who provide professional services for CCE.

Individuals should be familiar with this policy prior to incurring expenses to assure that costs will be reimbursable. They should understand the CCE requirements for documentation of expenses, and realize that a lack of proper receipts may result in non-reimbursable expenses and delays in processing expense reimbursements.

Claims for expense reimbursements must be signed and submitted to the CCE Administrative Office on a current Travel Expense Report/Claim form. Receipts must be submitted for all expenses and included with the Travel Expense Report/Claim form as backup documentation. NOTE: Non-receipted claims for miscellaneous expenses may be submitted not to exceed \$25.00 per day. Electronic submission of forms and receipts is authorized providing a signature is affixed. All documentation should be received by the office within ten (10) days of the conclusion of the meeting or activity.

B. Approvals

The Administrative Office Staff will review all Expense Reports in accordance with this policy, and submit them to the CCE Vice President for Accreditation & Operations for approval. Should a dispute occur concerning allowable expenses, the Vice President will forward the appropriate documentation to the CCE President for resolution within a reasonable time period. If the CCE President is unable to achieve a resolution, an appeal may be made to the Council Executive Committee for final disposition.

II. Allowable Travel Expenses

Airfare:

All individuals traveling at CCE expense should book flights at least 30 days in advance to obtain best possible rates. Only coach/economy airfare and coach/economy upgrades will be reimbursable. All other class options are not authorized for reimbursement, except in extenuating circumstances, and these situations must be pre-approved by the CCE President. If roundtrip airfares are not booked, for example if the air travel destination for a CCE activity represents one leg of a multi-leg trip involving other purposes, CCE will reimburse only the portion of the airfare that would have been equivalent to a direct round trip flight to and from the CCE activity, based on prices at least 30 days in advance of the travel date.

Ground Transportation:

Personal automobile use will be reimbursed at the current Internal Revenue Service (IRS) standard mileage rate for such use. Mileage must be annotated on the mileage log of the Travel Expense Report/Claim form or a route map showing mileage must be included. Reimbursement for personal

CCE Policy 94 Expenses, Honoraria and Stipends (cont.)

vehicle mileage should not exceed the equivalent of coach/economy airfare to various destinations except when it is necessary to use a personal vehicle to transport materials or equipment for reasons of safety, security from loss, and/or expense.

Taxicab, bus, shuttle, rideshare (e.g., Uber/Lyft), etc. are all reimbursable expenses. Individuals are encouraged to use shuttle vehicle service, if available, between airports and hotel/meeting venues and taxicabs if more appropriate. Limousine service may be utilized, if the cost of such is comparable to taxicab fares.

Vehicle rentals should be approved in advance by the CCE President. **Accident liability, medical and collision insurance for rental vehicles is required to be purchased through the rental agency and the cost of such will be reimbursed by CCE.**

Lodging:

For many large group CCE functions, rooms at the event location are booked well in advance, lodging costs are known and the CCE directly pays for the cost of the negotiated package. Often meals are included. For other CCE related activities such as committee meetings, site visits, etc., individuals should utilize the assistance of the CCE Administrative Office in making lodging and meeting room arrangements to the extent possible, and exercise reasonable judgment in the selection of hotels. In these instances, the individual normally pays for the hotel stay, and must submit receipts for all lodging costs with the Travel Expense Report/Claim form.

Meals:

Reimbursement for meals should be limited to a \$100.00 per day per individual, to include room service. CCE does not normally reimburse for a “separate” meal if the meal is provided as part of a meeting, unless special circumstances, such as an illness, prevent an individual from attending group meals. In an instance where one individual pays a bill for a group, the names of all persons present must be identified on the receipt.

Shipping of Materials:

Using the most cost-effective carrier, individuals may send required meeting materials along with personal notes to and from a meeting site to the attention of themselves, if shipping is more convenient and/or economical than airline baggage service. Using second-day service, they must pre-pay shipping costs and submit the receipt to the CCE Administrative Office on their Travel Expense Report/Claim form for reimbursement.

Tips, Telecommunications, and Miscellaneous Expenses:

Miscellaneous expenses may be submitted as non-receipted claims, not to exceed \$25.00 per day, and may include the following: personal and business phone calls; internet connection fees; and tips/associated expenses to, taxi/shuttle drivers, and hotel staff.

CCE Policy 94 Expenses, Honoraria and Stipends (cont.)

Other:

Travel days for all individuals involved in CCE approved activities will be reimbursed and may include the day before or after a meeting or event, if reasonable travel arrangements do not allow arrival and departure on the first day and/or last day of the activity. Any travel days beyond these should be approved in advance by the CCE President or Vice President.

III. Honoraria

Members of the Council, site teams, committees and task forces will receive a standard honorarium in the amount of \$200.00 per day for time spent while engaged in CCE travel and activities. Honoraria also includes pre-meeting and post-meeting travel days noted above, if circumstances justify such travel arrangements. The Council Chair or CCE President may authorize the payment of honoraria to individuals who provide consultative or other professional services to CCE at his/her discretion and this shall be reported to the Council.

IV. Stipends

The Council Chair receives a stipend of \$500.00 each month. The other officers of the Council Executive Committees each receive a stipend of \$100.00 per month. In addition, the Council Chair may approve stipends for individuals who provide significant and/or extended professional service on special committees or task forces and this shall be reported to the Council.

V. CCE Administrative Staff

When a DCP requests consultative assistance from CCE Administrative Office Staff, the DCP must reimburse the CCE for all expenses incurred, and must also pay an additional \$200.00 per diem charge if the services extend beyond two working days. All requests in this instance must be approved in advance by the CCE President and/or Council Chair.

Approved: 2/2/91

Revised: 11/19/92, 5/13/93, 1/27/96, 1/18/97, 9/12/01, 1/13/02, 1/8/05, 7/15/06, 3/17/08,
3/8/09, 1/17/10, 1/11/13, 7/15/16, 7/9/21

CCE Policy 100 Publication Rights and Patents

1. To insure that The Council on Chiropractic Education (CCE) will be free to dispose of data in a manner consistent with its obligations to the sponsor and to the public, ownership of all copyrightable and patented material developed in the course of, or pursuant to, a sponsored research or other agreement entered into by CCE shall be determined in accordance with the terms of the sponsored research or other agreement, or, in the absence of such terms, the material shall be the property of CCE.
2. All copyrightable, non-copyrightable and patented material developed by the CCE Administrative Staff with the significant use of funds, space, equipment and materials administered by the CCE shall be the property of CCE.

The CCE shall exercise its rights over such material in a manner that will most effectively further the goals of CCE as an educational accrediting agency. Full consideration will be given to making the material available to the public on a reasonable and effective basis, avoiding unnecessary exclusions and restrictions, and providing adequate recognition of the authors, where and when appropriate.

3. Copyrightable, non-copyrightable and patented material(s) not falling within the provisions of the above categories is wholly the property of CCE.

Royalty income and other income received by CCE through the sale, licensing, leasing or use of copyrightable and patented material in which the CCE holds a property interest, as described above, may/or may not be determined by the Council Executive Committee (CEC). The gross royalties received by CCE will be distributed as determined by the CEC according to the following guidelines:

- a) Copyrights and patents shall be assigned to CCE.
- b) A flat rate manuscript fee, as determined by the CEC, shall be offered to the author.
- c) Since copyrights and patents will be in the name of CCE, royalties to authors shall commence following the total write-off of the printed publication, the cost of which shall be borne by the CCE. A per unit royalty fee, ranging from 2% to 10% of the selling price shall be negotiated between the author and the CEC.
- d) At its discretion, CCE shall deduct from gross royalty income, prior to distribution, expenses, such as litigation, which may be incurred enforcing or defending the copyright or patent or licensing the copyrightable or patented material.
- e) If authorship cannot be determined, the percent share of royalties intended for the author shall be distributed to CCE.
- f) Whether a manuscript is purchased outright or under the terms of a royalty agreement, the author shall not produce a similar publication or supplement for sale through sources other than the CCE without prior authorization.
- g) The CCE shall have the right to determine the extent of distribution and sale of the title.
- h) Any supplements to the initial publication shall become part of the written agreement. The author shall be reimbursed in accordance with the terms prescribed in the original contract or agreement between the author and the CCE. Supplements to the original title shall not be made available for sale or distribution by the author or any other agency other than CCE.

Approved: 2/02/91
Revised: 1/12/03, 3/8/09, 1/17/10

CCE Policy 109 USDE and CHEA Recognition

The Council on Chiropractic Education (CCE) shall take all necessary steps to maintain recognition as an accrediting agency by the Secretary of the U.S. Department of Education (USDE) and by the Council for Higher Education Accreditation (CHEA).

Approved: 2/2/91
Revised: N/A

CCE Policy 111 Notification of CCE Accrediting Decisions

1. No later than thirty (30) days after a decision is made, the Council on Chiropractic Education (CCE) will provide written notice, to include the bases and reasons for the decision, to the U.S. Department of Education (USDE), all state licensing boards, appropriate accrediting agencies and the public regarding the following accreditation decisions:

Award of initial accreditation or reaffirmation of accreditation of a program.

2. No later than thirty (30) days after a decision is made, the CCE will provide written notice, to include the bases and reasons for the decision, to the USDE, all state licensing boards, appropriate accrediting agencies and the public at the same time it notifies the program, regarding the following accreditation decisions:

Final decision to place a program on probation (or an equivalent status) or an initial decision of denial, withdrawal, suspension, revocation or termination of accreditation or reaffirmation of accreditation.

3. No later than thirty (30) days after a decision is made, the CCE will provide written notice, to include the bases and reasons for the decision, to the USDE, all state licensing boards, appropriate accrediting agencies and the public at the same time it notifies the program. Within this written notice, CCE provides the affected program the opportunity to provide official comments, if any, that the affected program may wish to make with regard to that decision, or evidence that the program has been offered the opportunity to provide official comments, regarding the following accreditation decisions:

Final denial, withdrawal, suspension, revocation or termination of accreditation or reaffirmation of accreditation.

4. For any accreditation decisions listed in section 2 and 3, the program is also required to disclose the decision to current and prospective students within seven (7) business days of receipt of CCE's written notice and provide a copy of the notification to CCE at the same time it notifies the students.
5. The CCE will also provide written notice to the USDE, all state licensing boards, the appropriate accrediting agencies and the public, when a program decides to voluntarily withdrawal its accreditation status (within 10 business days of receiving notification from the program) or

voluntarily let's its accreditation lapse (within 10 business days of the date of which accreditation lapses).

6. If at a later date a state agency or another recognized accrediting agency requests information about the action taken against a program, the CCE will provide the information to the agency.

Approved: 1/24/98

Revised: 5/7/01, 1/12/03, 5/16/06, 1/20/07, 3/8/09, 1/13/12, 7/11/14, 1/10/19, 1/10/20,
7/9/20

CCE Policy 142 Council Meeting Seating

Only The Council on Chiropractic Education (CCE) Councilors, legal counsel, Ex-Officio members and CCE Administrative Office staff shall be seated at the meeting table.

Temporary seat(s) shall be made available for invited guest speakers to make presentations as needed.

Approved: 6/24/91

Revised: 1/12/03, 3/8/09, 1/17/10

CCE Policy 145 Non-Discrimination and Equal Opportunity

The Council on Chiropractic Education (CCE) and its Council shall conduct all relevant affairs regarding membership, service, hiring, appointment, promotion, assignment or other conditions in accordance with nondiscriminatory and equal opportunity practices.

Approved: 2/2/91

Revised: 1/12/03, 3/8/09, 1/17/10

CCE Policy 151 Service to the Public and Public Disclosure

To provide service to the public and adhere to public disclosure requirements from CCE's recognition agencies, The Council on Chiropractic Education (CCE) shall maintain the following information on its official website (www.cce-usa.org):

1. List of current CCE Councilors, Administrative Office Staff, Member Representatives, Committees and Academy of Site Team Visitors.
2. Council accrediting actions and public disclosure announcements.
3. A current list that identifies all programs having accredited status. This list shall also identify the anticipated dates for the next regularly scheduled accreditation review, which includes, the program's next comprehensive evaluation site visit and status review meeting with the Council.
4. The academic and professional qualifications and relevant employment and organizational affiliations of the members of the CCE Council and Administrative Office Staff.
5. Current CCE Publications, to include, the *Standards, Bylaws, Manual of Policies, Accreditation Manual, and Academy of Site Team Visitors Manual*.

Approved: 2/2/91

Revised: 1/13/02, 5/16/06, 3/8/09, 1/17/10, 7/11/14, 7/9/21

CCE Policy 157 Use of Consultants

1. The Council on Chiropractic Education (CCE) Council or its Executive Committee and the CCE President may engage the services of consultants from time to time to facilitate CCE activities, functions and processes, and to make such studies as deemed necessary.
2. The Council shall, when requested by DCPs, suggest possible consultants. Such suggestions may include past members of the Council, institutional staff familiar with the Standards or site visit team members experienced in particular areas. Conflicts of interest are to be avoided. (Reference: CCE Policy 18, Conflict of Interest).

The DCP shall contract with the consultant on a private and exclusive basis with the clear understanding that no advice offered by the consultant implies a commitment by the Council or the CCE. Any report generated is rendered to the DCP only. The report shall not be submitted to any CCE or Council representative either at the time of the consultation or at the time of evaluation unless released by the DCP Chief Administrative Officer or Governing Board Chair.

However, if the Council requires the use of a consultant in its evaluation of a DCP, a copy of any consultant report generated will be provided to the Council.

Approved: 2/2/91

Revised: 1/13/02, 1/22/06, 3/8/09, 1/17/10