
EXISTING SCHOOL & PROGRAM APPROVAL GUIDE

Understanding EAP Oversight



**PROTECTING WISCONSIN CONSUMERS
AND
PROMOTING INSTITUTIONAL EFFECTIVENESS**



EAP CONTACT INFORMATION

EMAIL

DSPSEAP@wisconsin.gov

PHONE

(608) 266-2112, ext. 8

ADDRESS

USPS

P.O. Box 8366

Madison, WI 53708-8366

FedEx or UPS

4822 Madison Yards Way

Madison, WI 53705

Although every effort has been made to ensure the content of this document is accurate, the EAP's statutory or administrative code provisions take precedence in matters of ambiguity or dispute. The information contained in this document is subject to change without notice. An online version of this document can be found on the [EAP website](#) and is considered the official document of record.



TABLE OF CONTENTS

SECTION I: UNDERSTANDING EAP SCHOOL APPROVAL

PART A: EAP'S PURPOSE & MISSION

Overview	1
Working with the EAP	1
How Long Does Approval Take?	1
Costs of Being an Approved School	2

PART B: BEING AN EFFECTIVE SCHOOL

Overview	3
School Vision, Mission & Goals	4
Organizational Management.....	4
Administrative Responsibilities	5
Facilities & Operations.....	5
Fiscal Analysis & Planning.....	6
Market Assessment	6
Curriculum Development, Delivery & Evaluation	6
Staff & Instructor Selection	8
Professional Development & Evaluation.....	8
Advertising / Student Recruitment	8
Student Enrollment	9
Student Services & Support.....	9
Program Evaluation (Graduates & Employment).....	9

SECTION II: MAINTAINING APPROVAL

PART A: ANNUAL RENEWAL

Overview	11
Renewal Process.....	11
Student Outcomes Reporting	12

PART B: SCHOOL VISITS

Overview	12
School Visit Process	13
Types of Visits	13
Comprehensive	13
Annual	13
New School	13
Other	13



PART C: ADDING OR REVISING PROGRAMS

Overview 14
Adding a New Program..... 14
Revising an Existing Program..... 14

PART D: CHANGE OF OWNERSHIP OR CONTROL

Overview 14
Change of Ownership or Control Process 15
Requirements 15

SECTION III: OTHER SCHOOL / EAP INFORMATION

PART A: STUDENT COMPLAINTS

Overview 16
Student Complaint Process 16

PART B: SCHOOL CLOSURE

Overview 16
Orderly & Planned Closure 16
Unplanned Closure 17
Teach-Out..... 17
Student Records..... 17
 Academic Records 18
 Financial Records 18

PART C: EAP COMMUNICATIONS

Overview 18
EAP Website 18
Directory of Approved Schools 19

SECTION IV: APPENDICES

Fee Schedule 20
Sample School Visit Questions..... 21
Table of Forms 24



THIS PAGE HAS BEEN INTENTIONALLY LEFT BLANK



SECTION I: UNDERSTANDING EAP SCHOOL APPROVAL

PART A: EAP'S PURPOSE & MISSION

OVERVIEW

The Educational Approval Program (EAP) exists to protect consumers and ensure education and training programs meet quality standards. A school seeking approval goes through a rigorous process, which includes the following:

- Evaluating applications for approval of schools, programs, representative permits and teaching locations.
- Requiring a surety bond to demonstrate financial stability.
- Ensuring schools adhere to legal requirements in their catalogs/handbooks and enrollment agreements.
- Reviewing advertising materials for honesty and fairness.

WORKING WITH THE EAP

A designated school official should contact the EAP prior to starting the approval process.

Because the school and program approval process is rigorous and complex, it is suggested that after reading through this information ***a designated school official contact the EAP and speak with a school administration consultant*** who will discuss the application process to make sure the school fully understands all requirements.

Be aware that the EAP is an entirely fee-based agency. If a school submits an application with errors or needing modification, revision fees may be assessed. By doing up-front work with an EAP school administration consultant, a school can save money and speed up the review process.

After completed application materials are received with the appropriate fees, surety bond, and all supporting documents, the EAP checks to make sure all required information and forms have been submitted and that the school is in compliance with Wisconsin law.

Throughout the review process, the designated school official will be kept informed about the school's application status. If anything fails to meet EAP requirements, information is missing or needs to be changed; the school will be notified by telephone, e-mail and/or letter. In some instances, a simple conversation over the telephone or a face-to-face meeting may be helpful in moving the approval process along.

HOW LONG DOES APPROVAL TAKE?

The approval process officially begins when all information and application materials are received.



- By policy, the EAP may take up to *70 business days* to make an initial determination regarding application materials. EAP staff works with many schools and operates on a first-come first-serve basis. If a school must be approved by a certain date, please take this into account when submitting application materials.
- If any part of the application needs to be revised, schools have *60 calendar days* from the date of being informed of their application status to submit the required modifications; or the school will be required to begin the process again with all fees due.
- An unapproved school that is already operating has *60 calendar days* from the date of being informed it needs to be approved to submit an application and required forms. Failure to comply with requirements of the EAP may result in the matter being referred to the Attorney General for appropriate enforcement action.

COST OF BEING AN APPROVED SCHOOL

The EAP's regulatory functions are funded by assessing various fees.

The EAP funds its regulatory functions by assessing various fees. These fees are governed by SPS 404.10 of the Wisconsin Administrative Code and fall into either one of two categories – one-time/fixed fees or renewal fees.

- *One-Time/Fixed Fees*: These are application fees for initial school approval, new or revised programs, new teaching locations, representative permits, and changes in ownership or control. A detailed listing of fees is contained in the Appendix of this guide.
- *Renewal Fees*: These fees are payments that must be made annually. The fee consists of two payments. The first payment is a flat amount of \$500 (\$100 if the school is inactive) that is due September 1 for the upcoming renewal year. The second payment is due March 1 of the renewal year and is based on a multiplier applied to each school's reported Adjusted Gross Annual School Revenues (AGASR).

The multiplier, established by the department of safety and professional services, must be equal to the percentage of the total AGASR for all approved schools needed to equal the cost of EAP's regulatory functions, less revenue from all other (one-time/fixed) fees. The multiplier is required to be calculated (in odd calendar years) for two-year periods, but is re-examined every year. This provision is intended to make the renewal fee more stable and predictable for schools.

- *Student Protection Fee*: Schools are assessed an annual fee, also due March 1, along with second payment renewal fees, to support a student protection fund. The student protection fund is intended to provide a safeguard for students in the event of a catastrophic school closure when required funding from the school bond is inadequate to fully indemnify students.



Similar to the multiplier, the Student Protection Fee (SPF) is also based on the AGASR. However, the amount is based on a fixed rate of \$0.50 per \$1,000 of reported revenue. In addition, state law requires the EAP to suspend assessing a fee when the appropriation balance of the SPF fund exceeds \$1.0 million.

- *Surety Bond:* As a condition of approval, a school must retain a surety bond, generally in the amount of \$25,000. More detailed information is contained in Section II: Initial Approval, Part A.

PART B: BEING AN EFFECTIVE SCHOOL

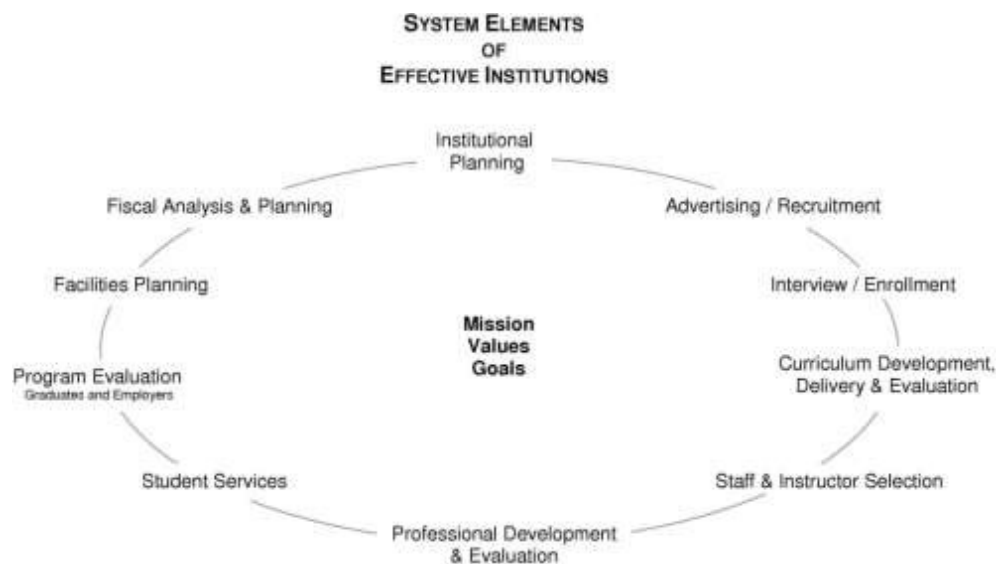
OVERVIEW

While the EAP is a regulatory agency designed to protect consumers, the design of its oversight model is based, not solely on compliance, but also on institutional effectiveness. This design promotes quality, organizational accountability, and continuous improvement for schools as well as the EAP.

The EAP's oversight model is based on the following underlying principles:

- The best way to protect students is to enhance the schools and their programs by holding schools accountable for outcomes data.
- There needs to be a cooperative working relationship with schools for institutional effectiveness to be successful.
- Schools must develop an internal capacity for making decisions based on data, for satisfying students, and for continuous improvement.

The structure and systems of the EAP's regulatory model are represented in the illustration below.





SCHOOL VISION, MISSION & GOALS

To help understand why a school wants to offer an education or training program to Wisconsin residents, it is important that the EAP staff understand the vision, mission and goals of the school.

- *Vision:* A school should be able to articulate what it wants to achieve at some future point in time. Its vision is something the school constantly strives towards.
- *Mission:* A school must be able to clearly state its mission. The education and training provided should be consistent with the school's mission and are documented by either a needs assessment or market experience.
- *Goals:* The school should have broad goals that are clearly stated, support its mission, and are understood at all levels of the organization.

A school will be asked to submit an institutional plan.

As part of the approval process, a school generally will be asked to submit an institutional plan that encompasses both its educational and business objectives. Such a plan should support the school's mission, facilitate the accomplishment of the school's organizational goals, and be updated annually. In addition, the plan should include specific and measurable objectives, with corresponding operational strategies, projected time frames, required resources, and method(s) for subsequent evaluation of each objective.

During the approval process, a school will be also asked to address the following questions.

- Who will the school serve and what do they expect as a result of the education or training provided?
- What market research is available that shows there is a need for the type of programs that will be offered and shows graduates will have labor market success and/or career advancement?
- How will the school's mission drive program development, student assessment, program evaluation, and institutional self-improvement?

ORGANIZATIONAL MANAGEMENT

A school seeking approval must be able to demonstrate that it has a management structure that is both capable and responsible.

- *Governance:* The school should have a governing body and/or senior management team that is responsible for developing and maintaining an effective framework of written strategies and policies. This type of management structure helps ensure the integrity and effectiveness of the school and its compliance with applicable statutory, regulatory and accreditation requirements.



- *Operational Management:* The school must be able to develop operating strategies and policies within a clearly defined and understood organizational framework. This includes written policies and procedures that guides the school's day-to-day operations.
- *Professional Relationships:* The school will need to establish relationships with other organizations within the education/training and employer/industry network. These relationships are to be maintained, utilized, and documented for the purpose of enhancing the quality of the education, training, and student services.
- *Communications:* The school management is responsible for ensuring that regular and effective communication occurs among appropriate members of the institution on pertinent aspects of its operations, including the delivery of quality education and training services. To maintain operational effectiveness, periodic meetings with employees should be conducted and appropriate documentation maintained on significant issues, consistent with the size and purpose of the institution.

ADMINISTRATIVE RESPONSIBILITIES

Student records must be kept for a minimum of six years from graduation or last date of attendance.

A school that has a well-run management structure, will be capable of managing the various administrative responsibilities associated with operating a school.

- *Records:* The school will need to have an organized record-keeping system that ensures all records are maintained in an accurate, orderly, and up-to-date manner. A good record-keeping system will be able to facilitate ready access and review of those records by appropriate parties. In addition, all records are to be protected from unauthorized access and undue risk of loss. The school should have a policy that addresses appropriate access by employees and students to information contained in their files. Finally, records must be maintained for a period of time consistent with applicable statutes, regulations, and sound business and educational practices.
- *Personnel Management:* The management of a school should develop, implement, and maintain written policies and procedures for the periodic and effective recruitment, selection, hiring, training, and retention of personnel. In addition, school management should provide appropriate orientation, supervision, evaluation, and training and development of its employees to ensure qualified and capable personnel, at appropriate staffing levels, are effectively utilized.

FACILITIES & OPERATIONS

A school must have adequate facilities and operations appropriate for the type of program that it offers.



Approval must be obtained for all sites at which instruction occurs.

- *Facilities:* The school facility must be appropriate for the education, training, and student services offered. It is important that instruction be conducted in a safe, accessible, sanitary, and comfortable environment, which is free from distraction. A certificate of occupancy and current fire inspection report will need to be provided for all sites at which instruction occurs.
- *Equipment, Supplies, and Learning Resources:* Adequate, appropriate, and functional equipment, supplies, furnishings, and learning resources required to effectively provide the education and training services should be readily available for instructor and student use.

FISCAL ANALYSIS & PLANNING

A school will need to show it is fiscally sound.

A school seeking EAP approval must be able to demonstrate that it is fiscally sound and has undertaken an analysis showing its operations are financially viable. The school must demonstrate responsible financial management with resources sufficient to deliver the education or training being offered. Annually, schools will be required to submit financial information during the school renewal process.

Tuition and other charges must be applied fairly and consistently, and payments must be properly recorded and tracked. Cancellation and refund policies must comply with specific requirements prescribed by SPS administrative code.

If the school provides financial assistance, including loans from alternative lenders, it must ensure that such financial assistance programs are responsibly managed, governed by written policies and procedures, and in full compliance with relevant statutes and/or regulations. Moreover, all student financial assistance must be awarded in a fair and equitable manner.

MARKET ASSESSMENT

A school must be able to demonstrate that there is a need for the program(s) that it will offer. The EAP will want to know that students in the target market will enroll in the program(s) to be offered and that employers have a need for the school's graduates.

CURRICULUM DEVELOPMENT, DELIVERY & EVALUATION

Prior to approving a program, an EAP school administration consultant will review it to determine if it is aligned with the school's mission and if it meets industry standards/needs. This means a school's curricular design, materials, and outcomes measurements must follow sound educational practices.



Schools should have a sound, written assessment system that contains a set of defined elements.

- *Educational Goals and Objectives:* The school's programs must have appropriate educational goals and objectives. The curricular content and learning experiences should present a sound, systematic, and sequential educational methodology. Each program must have sufficient and appropriate knowledge and skill elements included to ensure adequate preparation for the expected performance outcome.
- *Program/Instructional Materials:* Program materials, including syllabi, lesson plans, instructional guides, and texts should be of the appropriate scope, sequence, and depth of each program in relation to the stated goals and objectives. Instructional materials, including supplementary textbooks, software, learning activities, visual aids, electronic links, and other teaching tools should support the goals and objectives. Such materials must be up-to-date, readily available, and facilitate positive learning outcomes.

The school must provide a sufficient number of sites to ensure appropriate and timely learning experiences in its externship / internship program.

- *Performance Standards:* Performance standards should be written and periodically evaluated and updated to ensure instructional effectiveness. Further, the school should have a sound, written assessment system that contains a set of defined elements, such as grading scale, weighting factors, tests, quizzes, reports, projects, attendance, and participation, that are appropriately related to the performance objectives of the program.
- *Curriculum Review/Revision:* A school should have appropriate procedures to continuously monitor and improve its curriculum, which include soliciting feedback from relevant stakeholders, such as faculty, students, graduates, employers, and advisory boards; as well as analysis of completion and, if applicable, employment/placement results. The procedures should focus on a comprehensive review of the curriculum as it relates to the expected learning outcomes.
- *Certification and Licensing:* If the purpose of a program is to prepare students to meet the standards for licensing, certification, registration, or other examination requirement, the curriculum must include appropriate preparation and materials to meet the requirements for such credentials. In addition, the school must track the pass rates of graduates and use the results to measure and improve the quality of the educational programs offered.
- *Instructional Methods:* Instructional methods should be designed to encourage active and motivated responses from students. Written policies and procedures need to be in place to ensure that the program material is followed and that there is consistency of application by all instructional staff. The instructional methodology must be consistent with current training industry standards and appropriate to the educational goals and program objectives, must facilitate learning, and must serve the individual learning needs and objectives of participants.



- *Externships/Internships:* When required as a part of a program, an externship/internship or other training-related work experience should be based on a preplanned outline of the specific knowledge, skills, and experience to be acquired. Written policies and procedures for the supervision and evaluation of such externships/internships must be established and followed by the institution to ensure consistency and effectiveness. The institution must also provide a sufficient number of sites to ensure appropriate and timely learning experiences in its externship/internship program.

STAFF & INSTRUCTOR SELECTION

A school is required to have qualified staff and instructors who are capable of effectively managing school operations and delivering the education or training being provided. Effective recruitment, selection, orientation, and evaluation processes should be utilized to ensure the school has quality personnel.

- *Qualifications:* Instructors must possess the appropriate combination of educational credential(s), specialized training and/or certification, work experience, and demonstrated teaching and classroom management skills, which qualifies them for their training assignments. Moreover, instructional personnel must meet all relevant accreditation, federal, state, local, and/or industry-specific requirements.

PROFESSIONAL DEVELOPMENT & EVALUATION

Schools should develop and implement an effective, written policy for ongoing professional development.

An effective school will have a clearly defined professional development program for instructors, and will involve them in processes to evaluate student learning and program effectiveness.

- *Supervision:* Instructors should be properly supervised. Regular classroom observations, along with student, peer, and supervisory feedback should be documented and used to enhance the quality of instruction.
- *Orientation and Training:* Every school should develop and implement a written policy for the effective orientation and training of instructional personnel to ensure a consistent, high level of instruction. It should also develop and implement an effective written policy for ongoing professional development.

ADVERTISING / STUDENT RECRUITMENT

A school should only recruit students who can reasonably be expected to benefit from the education or training delivered, and should provide student services appropriate to their needs.

- *Recruitment:* Informational and promotional materials, advertising, and representations made by or on behalf of the school must be



accurate and truthful. Claims regarding programs, costs, location, instructional personnel, student services, and outcomes must be both justifiable and provable. Schools are prohibited from claiming or implying that employment, occupational advancement, and/or certification and licensing are guaranteed.

STUDENT ENROLLMENT

Schools may not claim or imply that employment, occupational advancement, and/or certification and licensing are guaranteed.

A school must provide and fully disclose to students its enrollment and transfer of credit policies.

- *Enrollment:* If a school requires students to sign a written enrollment agreement, it must be clearly stated, defined, and in compliance with statutory, regulatory, and, if applicable, accreditation requirements. Reliable and regular means should be utilized to ensure that, prior to acceptance, all applicants are able and qualified to benefit from the education and training services. In addition, the enrollment process should be regularly monitored by the institution to ensure its integrity.

Enrollment agreements are legally binding contracts and must fully disclose the rights, obligations, and responsibilities of all parties, including: (1) all costs stated in clear and explicit language; and (2) cancellation and refund policies that comply with statutory, regulatory, and accreditation requirements. The enrollment agreement (or contract) must be furnished to appropriate parties before any payment or obligation is made.

STUDENT SERVICES & SUPPORT

Schools are required to make students aware of their complaint process and provide the ability to file a complaint with the EAP.

A school must offer services designed to support the instructional program and to help students attain their educational and career goals.

- *Student Services and Support:* Students must have access to a variety of services – academic advising, tutoring, employment/placement advisory services, counseling, extracurricular activities – consistent with the school’s specific mission and learning objectives.
- *Student Complaints:* Every school is required to have a student complaint process and must make students aware of the ability to file a complaint with the EAP should they be unable to resolve a complaint directly with the school (***EAP Form 3.01***).

PROGRAM EVALUATION (GRADUATES & EMPLOYMENT)

A school must have an evaluation process for assessing student learning, gauging participant satisfaction, determining employer satisfaction, collecting other graduate follow-up data and using results to improve the program and school operations.



Satisfaction questions prescribed by the EAP must be used.

- *Student Progress:* A school should monitor, assess, and record the progress of participants utilizing an assessment system with a set of defined elements that are appropriately related to the performance objectives of the programs. Credits or clock hours must be used to denote the successful completion of the education and training program being delivered. Student progress must be documented consistently in accordance with the school's performance standards. In addition, students must be informed of their progress on a regular and timely basis.
- *Student Outcomes:* A school will be required to report annually on the number of students who enrolled, dropped/withdrew, completed, and obtained employment during the previous year.
- *Student Satisfaction:* In addition to the above-referenced outcomes, the school must use an EAP-prescribed survey questions to ascertain the satisfaction of students related to the school and the program they received. Specifically, a school must ask students the following two questions.
 1. Did the educational program meet your expectations?
 2. Were you satisfied with the school?

Students must be asked these questions, in writing (email is acceptable), at the end of their program, and required to submit their responses (may be anonymous) as one of the steps leading up to graduation. In addition, students must be given an opportunity to explain their response in more detail. The questions can be incorporated into a more comprehensive end-of-program survey that is given to students.



SECTION II: MAINTAINING APPROVAL

PART A: ANNUAL RENEWAL

OVERVIEW

A school must renew its school and program approval annually. The EAP's renewal process requires schools to 1) verify certain information, such as administrators and contacts; 2) provide financial information, including the amount of revenue generated by serving Wisconsin students; and 3) report student outcomes data. Periodically, the EAP may also conduct a site visit, which is further explained in Part B of this Section.

Under the EAP's administrative rules, schools have a duty to report changes that affect their facilities, finances, programs and/or personnel.

These processes are key elements for the EAP's regulatory cycle. Approved schools are part of this annual cycle and subject to its requirements. The EAP is including this section, which focuses on evaluation, data, and results, so that a school can fully know what is expected of them when renewing for school approval.

It is noted that the annual renewal, data collection, and site visit processes really complete the circle. These processes focus on the results of what happened after the school was first approved. Because the questions in each section of this guide focused on the evaluation processes of the school and program results, it is only fitting that the EAP regulatory cycle mirror that of schools by focusing on evaluation processes and program results: What happened to graduates and how are programs and other operational processes being improved so that next year's graduates are even better prepared?

The EAP's role is to create an oversight context that expects and encourages each school to improve its processes and student results. As the EAP continuously improves its processes, it should lead the way for each school to do the same. But as the EAP makes changes in requirements, specific items, and even in the forms themselves, schools will need to be flexible and adjust accordingly. While changes in the specifics will happen, the EAP's direction will remain constant: consumer protection, quality programming, and better student results.

This section highlights some of the key points that the EAP emphasizes in each of these processes. The information in this section is intended to provide a good picture of what to expect from the EAP during the annual regulatory cycle.

RENEWAL PROCESS

Initial school approval is granted from the date of approval to December 31 of the calendar year in which it is approved. Schools must renew their approval by September 1 for the coming calendar year as required under



SPS 404.01 (4) of the administrative rules. The annual renewal process is completed online and starts in mid-July when instruction information is sent to schools with a User ID and a Password.

To retain approval and remain in good standing, every “active” school must meet all requirements of the **renewal process** and pay all required fees. Active schools are those schools enrolling students. A school could choose to become "inactive" during the renewal process. This means the school approval is maintained, but the school cannot advertise or enroll students at any time during the year. A school may move from inactive to active status by paying the active status renewal fees.

It is the EAP's job to create an oversight context that expects and encourages each school to improve its processes and student results.

As part of the renewal process, schools will be asked to do the following:

- Verify and update general information about the school.
- Report the amount of revenue generated from Wisconsin students.
- Submit financial statements.
- Calculate the highest unearned tuition held by the school during the most recent 12-month repeating period.
- Provide student outcomes data.
- Verify employment/placement outcomes.
- Update institutional plans.
- Update program evaluation plans and performance data.
- Submit a renewal fee.

Student Outcomes Reporting

Successful student outcomes result from a well-managed school, which delivers a quality education. Schools are required to report outcomes annually on the school renewal application. The reporting categories are prior year continuing; new starts; drops/withdrawals; continuing next year; employed; program met expectations; and satisfied with the school.

PART B: SITE VISITS

OVERVIEW

The long-term interest of the EAP's oversight and site visits is to strengthen a school's capacity to improve.

Periodically, the EAP will visit a school. While these visits are to monitor for compliance with legal requirements, the long-term interest of the site visit is to strengthen the institution's own capacity to improve its internal processes, feedback loops and evaluation systems. This guide emphasizes the school as a whole and continually asks how it will know that what it is doing is effective for students. The EAP assumes that schools want to design ways to evaluate their students' success and methods to improve the school based on results data collected. The site visit is a way that the EAP can



work in partnership with the school to accomplish a common goal: to improve learning results and program outcomes for all students.

SCHOOL VISIT PROCESS

An EAP school administration consultant will periodically visit a school to perform a general compliance review and ask questions regarding student progress, school policies and procedures, and program results. Schools are expected to have student records in order and up to date, including information on dropouts, attendance, student progress, refunds, graduates and placement.

The school administration consultant will review the school file and data collected as part of the annual renewal process before a visit.

The EAP views the annual renewal, data collection and site visit as part of the processes that ensure schools are effective. They are logical extensions of reinforcing the direction set in the approval process. A sample set of questions that will be the foundation of a school visit can be found in **Section V: Appendices**.

TYPES OF VISITS

- *Comprehensive:* non-accredited schools generally will be visited every three years and accredited schools at the mid-point in accreditation cycle based on the last accreditation visit.
- *Annual:* an optional progress check of the school's institutional plan and goals, or specific issues, may be conducted.
- *New School:* schools that are not visited prior to approval generally will be visited within the first six months of operation, during the second year of operation, and then placed in a regular cycle.
- *Other:* a school visit may be triggered by a complaint or other concern and would likely be unannounced.

Prior to a school visit, the school's assigned school administration consultant will review the school file and the data collected as part of the annual renewal process. They will contact the school and arrange a date and interview schedule for the school visit. During the visit, EAP staff may interview administration, staff, and students; look at student records and the record keeping system; and will check compliance issues. Schools will receive a letter summarizing the findings of the school visit.

During a school visit, EAP staff may focus on the program outcomes data reported as part of the annual renewal. It is important that a school maintains accessible and easily tracked student financial and academic records. The EAP looks closely at outcomes, such as how many students completed each program and how many obtained employment in their field. As part of a visit, staff may also observe classes and talk with students and faculty.



PART C: ADDING OR REVISING PROGRAMS

OVERVIEW

A school is required to seek approval from the EAP each time that it adds a new program or revises an existing program by more than 25 percent.

ADDING A NEW PROGRAM

Adding a new program will require the school to complete a program application (**EAP Form 1.03**), provide its program materials so they can be evaluated as to whether the program's curricula, learning experiences, instructional guides, texts, and assessment practices demonstrate the appropriate scope, sequence, and depth needed to prepare students for career enhancement and advancement; and pay the appropriate fee.

The program curricula should also show how a school's program prepares its students to meet the labor market need identified as part of its mission and goals.

REVISING AN EXISTING PROGRAM

In order to review and approve revisions to an existing program, a school will be required to complete **EAP Form 1.03** and submit a subject-by- subject comparison of the currently approved program with the proposed program revision.

NOTE: You will need to provide the name(s), title(s), and telephone number(s), including area code, of persons to contact should there be any questions about the program or application.

PART D: CHANGE OF OWNERSHIP OR CONTROL

OVERVIEW

The EAP must be notified at least 30 days in advance of any anticipated change in control or ownership.

Since the EAP approves many private, for-profit schools, a change of ownership or control may happen. This is different from public or non-profit sector schools. When a school changes ownership or control, the transition can sometimes be destabilizing and disruptive for students. During an ownership transition, the EAP wants to ensure students are protected and program quality is maintained. To do so, the EAP statutes and administrative rules provide for specific oversight at this critical juncture. The purpose of the EAP's application for approval of a change of ownership/ control is not to add undue burden to the new owner, but rather to ensure a stable and smooth transition is made, and that the new owner will meet the obligations of the prior owner to students enrolled at the time of the transaction.



CHANGE OF OWNERSHIP OR CONTROL PROCESS

If a school does not inform the EAP of a change of ownership within 10 business days after the legal transfer occurs, its approval from the EAP lapses.

The administrative rules state that an approved school must notify the EAP at least 30 days before any anticipated change of ownership or control is to happen. The new owner/controlling interest then has 10 business days after the sale or transaction to notify the EAP; or the EAP approval for that school will end. If the new owners allow approval to lapse, the new owners would have to start the school approval process from the beginning and pay all applicable fees.

If a school makes a change of ownership or control, the school is required to submit fees as outlined on the fee schedule. This fee may be waived if the EAP determines only minimal effort was expended by EAP staff. Before submitting fees for a change of ownership or control, please contact the assigned EAP school administration consultant.

REQUIREMENTS

At a minimum, the following information will need to be provided for a change of ownership or control:

- School Ownership, Governance and Management (**EAP Form 1.01**)
- Fiscal Soundness:
 - Balance Sheet – Assets, Liabilities & Equity
 - Income Statement
- Revised or New Surety Bond:
 - Surety Bond Calculation
 - Surety Bond Contract (**EAP Form 1.02**) for coverage under the new ownership.
- Change of ownership or control fee (contact the EAP)

NOTE: If more extensive changes are made by a school, additional information may be needed.



SECTION III: OTHER SCHOOL / EAP INFORMATION

PART A: STUDENT COMPLAINTS

OVERVIEW

The EAP has authority under SPS 404.08 (2) of the administrative code to investigate complaints it receives about schools. Because every school is required to have a process to resolve complaints, persons generally must attempt to resolve matters of dispute with the school before filing a complaint with the EAP. In addition, complaints must be filed within one year after the student's last recorded date of attendance.

STUDENT COMPLAINT PROCESS

Upon receiving a complaint, the EAP will conduct an investigation. If findings indicate a statutory or administrative rule violation, or of an established school policy, the EAP will attempt, through mediation, to reach a settlement. If no settlement can be reached, the EAP may conduct a hearing and impose certain intermediate sanctions, or subject the school to a summary suspension of its approval. Persons filing a complaint should use the EAP's prescribed complaint form (**EAP Form 3.01**).

NOTE: Under Wisconsin's Open Records Law (Wis. Stats., Ch. 19), complaints will generally be available for review on request from a member of the public after the EAP has acted.

PART B: SCHOOL CLOSURE

OVERVIEW

A school may cease operating for a variety of reasons -- revocation of approval, sale to a new owner, bankruptcy, retirement or death of an owner(s). These closures are either planned or unplanned. In a planned closing or revocation of approval, EAP staff is able to work with school officials to facilitate the closing. An unplanned closing creates uncertainty for all those involved. School closures involve many parties; however, the student is the party that is most adversely affected by a closure.

PLANNED CLOSURE

If the closure is planned, approval will be revoked after all actions involved in the closure have been completed. When a school plans a closing, school officials must communicate their plan to all parties concerned, including the EAP, current and former students; school staff; accrediting bodies; Closed School Unit at the U.S. Department of Education (where federal financial aid



is involved); and all affected lending agencies. It is advisable that the school provides each current and former student with a copy of their final transcript.

UNPLANNED CLOSURE

In the event of an unplanned closure, the EAP will immediately revoke the approval of the school upon learning of the closure and notice will be provided to the school's surety bond company that the EAP intends to make a claim on the bond.

TEACH-OUT

A teach-out is an arrangement for students to complete an EAP-approved program in which they were enrolled. The school that is closing may plan to teach-out its own students, or may arrange for students to complete at another school with the same or similar program. A teach-out should be offered with no additional charge to the student.

The school that is doing a planned closing must submit a teach-out plan to the EAP. The EAP will review and approve the plan before the teach-out is entered into. The closing school may want to enter into a written agreement with the school(s) that will conduct the teach-out. In an unplanned closure, the EAP may enter into a written agreement with the school(s) providing the teach-out.

The school that accepts the students determines what course(s)/credits it will accept from the closing school and may assess additional fees as appropriate. Ideally, these fees would be paid by the closing school since students have paid in full at that school, but may be covered by the EAP's student protection fund. In addition, EAP staff will facilitate the transfer of student records to the accepting school(s). Before records are transferred, the EAP generally will get authorization for the transfer of records from each student.

If the school that is closing is accredited, it may need approval from the accrediting body, as well as the U.S. Department of Education (USDOE) to enter into a teach-out or transfer of students to other institutions. The Closed School Unit of the USDOE deals with financial aid concerns of the students.

In the event that there is no teach-out opportunity for students, other options will need to be considered, such as refunds, transfer to a different program, completion via an online program or other options that may arise.

STUDENT RECORDS

Schools generally have two types of student records under which all other records fall:



- *Academic Records:* Academic records should contain student information such as program of study, attendance records, grades, and transcripts.
- *Financial Records:* Financial records should contain information on program cost, how the student paid for the training, lender records, amounts paid to the school, and refund calculations, if applicable.

The EAP has the authority to take possession of and maintain both student academic and financial records.

The EAP will also assess the disposition of records. If a school does not have other satisfactory arrangements, the EAP has the authority to take possession of and maintain student academic and financial records. If a school participates in the federal financial aid program, the EAP will facilitate the transfer of financial records of those participating in the program to the Closed School Unit at the U.S. Department of Education.

Contact must be made and maintained with the property management staff in order to have access to the facility. The EAP has the authority to seek a court order if it is unable to obtain the records from school officials.

NOTE: If records are incomplete, the EAP will make an effort to work with staff at the school to complete the records.

PART C: EAP COMMUNICATIONS

OVERVIEW

The EAP understands that to achieve its mission and purpose, communication with prospective students, schools, state officials, and other interested parties is essential. It strives to provide current, up-to-date information at its website and publications.

EAP WEBSITE

The EAP website provides comprehensive information about the agency and its regulatory functions. The information is targeted at students, schools, and employers. The following is a brief summary of the information available.

The EAP website provides real-time updates and the ability to get information about student outcomes data for each program a school offers.

- *Students:* approved schools and programs, exempt school categories, school complaints, closed schools, and transcript requests.
- *Schools:* starting a school, school forms, and the annual renewal process.
- *Employers:* academic credentials, diploma and degree mills, and teacher certification.
- *Administration:* governing statutes and administrative rules, archive of newsletters, press releases, minutes of board meetings, administrative actions, board meetings, and strategic plan.



The EAP's website also provides users the ability to perform an interactive school and program search. Users can search the EAP's database using free-form text search. Users of the website also have the ability to explore which occupations different programs prepare students for by linking to data from the federal Bureau of Labor Statistics.



SECTION IV: APPENDICES

Fee Schedule

Initial School Approval

One non-degree program	\$ 2,000
One associate program	\$ 2,500
One baccalaureate program	\$ 3,300
One master's program	\$ 3,900
One doctoral program	\$ 5,100

Initial Distance Learning School Approval

Cost of the highest degree program offered (see above listing) plus \$500 for each additional program	\$ 500
--	--------

New/Revised Program

Non-degree program	\$ 1,500
Associated degree program	\$ 2,000
Baccalaureate degree program	\$ 3,000
Master's degree program	\$ 3,500
Doctoral program	\$ 4,500
Distance learning online program	\$ 500

Application Revision

Minor revisions	\$ 200
Major revisions	\$ 1,000

Additional Teaching Location

Each additional location	\$ 200
--------------------------	--------

Change of Ownership or Control

Each change	\$ 1,000
-------------	----------

School Representative's Permit

Each permit	\$ 200
-------------	--------

Deposit of an application fee does not constitute approval and operating out of compliance without approval may result in referral to state legal counsel. Approval does not occur until it has been specifically provided by the school's appointed School Administration Consultant.



Sample School Visit Questions

Schools can expect to be asked the following types of questions during a comprehensive site visit by its assigned school administration consultant.

> Consumer Protection

- Does the school's refund policy conform to the principles of those listed in administrative rules, and how are students informed about the school's refund policy?
- How many students used the refund policy last year and how did the school's process work?
- Is the school properly bonded?
- How does the school advertise and recruit, and does the school truthfully and fairly represent the school's program to students?
- Does the school's catalog or student handbook clearly explain to students the school's policies and its operation so students can make an informed choice?
- Does the catalog meet the basic requirements outlined in Wisconsin Administrative Code, SPS Chapter 4.03(2)?

> Mission/Reason for Being

- Does the school's mission clearly identify an employment objective or educational benefit for its adult population?
- Does the school's mission serve as the basis for program development, student assessment, ongoing program evaluation, and institutional self-improvement?

> Admissions/Student Retention

- Why are the school's admission requirements set as they are, and how do they help in student selection for and retention in programs?
- How are admission requirements consistent with the mission and program objectives?
- What is the school's retention rate over the last five years, and how has the school attempted to raise it?

> Curricula

- How do the written curricula accomplish the stated mission?
- Do the programs meet current industry/workplace standards, and how does employer/industry feedback affect curricula annually and on an ongoing basis?
- Are student performance standards clearly communicated to students, and has faculty built an assessment system based on the standards?



- How does the school and its faculty change curricula according to feedback like student satisfaction, industry standards, employer satisfaction, graduate follow-up studies and new research/ developments?
- Do the curricula involve students in an active, hands-on approach?

> Instructional Personnel

- How do the school's recruitment, selection, orientation and supervision processes ensure the school has quality instructors/teachers?
- How does the school ensure that instructional personnel know the student performance standards and can provide appropriate feedback to students about how well they demonstrate mastery and application of those standards?
- How does the school involve instructional personnel in evaluating learning success of students and in the effectiveness of overall programs?

> Student Services

- How does the school know whether students are receiving adequate advising, counseling, and placement services so students can benefit fully from the instructional program?
- What is the complaint process students can use, is it used and what are the results for students?

> Management

- Does management have clear plans with defined goals, strategies, and time frames for achieving those goals, and budgets/resources to fund the activities?
- How has management assured that staff throughout the organization understands organizational plans and have effective communication channels to discuss the organizational direction?
- When was the institution's last accreditation visit evaluation, and what has been done to implement the recommendations made?
- Are there institutional changes that have been made outside the accreditation process? What are they and what is their impact on improving student success?

> Financial Soundness and Stability

- Has the organization planned to have sufficient income to maintain a high-quality program and to complete the instruction of all enrollees?
- What is the systematic process of financial planning and budgeting?
- Does the institution annually undergo an objective audit by an independent accountant/accounting firm?



- Have the school's processes for refunds and cancellation been evaluated for accuracy and effectiveness, and how are they working for students?

> Evaluation

- How are students assessed and learning progress recorded, and what is the school's process to evaluate its effectiveness?
- Are students satisfied with the program and instructors, and how does the school gather and use this data?
- How does the school know whether employers are satisfied with graduates' knowledge and skills?
- Does the school have a placement process? How well does it work for graduates?
- How does the school do graduate follow-up studies and use retrieved data for program improvement?
- How has management planned for and evaluated the success of Wisconsin students?



Table of Forms

School Operations and Governance	Form 1.01
Surety Bond	Form 1.02
Program Application	Form 1.03
Background of Instructor	Form 1.04
School Catalog Checklist	Form 1.05
Enrollment Agreement Checklist	Form 1.06
Customer's Right to Cancel.....	Form 1.07
Teaching Location	Form 1.08
Representative Permit Application	Form 1.09
Institutional Planning	Form 1.10
Approval Checklist and Statement of Submission	Form 1.11
<hr/>	
Balance Sheet Template	Form 2.01
Income Statement Template	Form 2.02
Compliance and Institutional Assessment.....	Form 2.03
Employment Verification.....	Form 2.05
<hr/>	
Student Complaints	Form 3.01
Student Records Request	Form 3.02