MEMORANDUM

TO: ACCPAS Institutions and Constituents

FROM: Karen P. Moynahan, Executive Director

RE: Informed Decision Making: Collecting, Considering, and Synthesizing Information

We hope this finds you and the members of your families and communities well.

Community and precollegiate arts education initiatives in the United States are strong, resilient, and successful because of decades-long applications of expertise, fortitude, patience, cooperation, and unending effort. The National Office staff has had the honor and pleasure to speak with many individuals since this pandemic began. It is clear that the commitment of ACCPAS representatives to these virtues remains strong. Administrators are working to ensure the good and continuing health, the positive well-being, and the spirit of each individual, each school, and our art forms. There is no talk of quitting. Instead, administrators are seeking the means to triumph over adversity and discouragement. They know that their schools cannot look the other way or await generic answers to specific local problems, no matter how large and small. Individuals are seeking to make thoughtful decisions recognizing that individually and collectively, each has the power to envision, create, recast, and advance as each takes the actions needed to meet today’s and tomorrow’s challenges.

Administrators of community and precollegiate education programs always face many issues. They must make many decisions. Every day, issues in considerable number and breadth appear and require reflection, analysis, and action. Local parameters, professional expectations for teaching and learning, and community-wide educational cultures and procedures are springboards as executives employ their skills to gather information, shepherd conversations, assemble consensus, and develop courses of action. When successful, such efforts not only produce positive results, they also increase trust in decision-making elements and processes. Confidence is built from such successes and other components as well; for example, operational fealty to a clearly articulated and shared vision; factual, true, and genuine information analyzed and applied carefully; and considered conclusions and stable mechanisms that inform and assist individual and small group operations, work, and evaluation. Clearly, trust is a critical common element, and must be built in many dimensions and on many levels.

The accuracy and quality of information are major ingredients in building and maintaining trust. Whether facing the effects of the coronavirus, or whatever will come next, good and real information is key, as is honesty about the true status of information based on estimates: the ways and the extent to which estimates may be accurate at any given, but not necessarily in the next, moment. But there is more. It would appear that a characteristic shared by the most successful administrators is that of a desire to seek virtuosity in understanding detail by studying, evaluating, distilling, synthesizing, and formulating information-based conclusions for others to review, or to use in their own efforts, or to employ while cooperating with others. These information-based results are usually school-specific. Most often, they do not spring forth from raw information itself, but rather from a process that includes reviewing specific issues in light of multiple contexts, starting with core purposes and functions and moving on to current local, regional, and at times, national conditions and climates. These administrators also master the art of leading, of making changes when new information indicates that a previous decision should be altered. Such careful considerations are oriented more to making school-specific choices than to discovering and
following what is being said, thought, or done elsewhere. The rhetoric in such environments is almost always pure and focused on actions that are designed to serve the greater good.

Of course, time is an issue. Most practitioners in the arts seek efficient use of time because there is always so much to be done. Usually, it takes time to be thorough and discerning. Many issues are complex, many problems do not have single answers. At times, it takes time to define a problem clearly in terms of one’s specific situation. Simple, singular, and quick answers may be appropriate when such approaches fit the nature of the problem. Most likely, however, hastily made decisions as they pertain to complex matters create difficulties down the line and postpone the formulation of ways forward that address both the short- and long-term aspects of an issue in relationship with other issues and goals. Virtuoso administrators are careful about setting precedents, or ending with solutions that work in one sector, but do damage in others, or being insufficiently aware of the local context or the full set of real costs and risks associated with a specific course of action. They are willing to take the time necessary to be thorough, to look at options in light of the full range of operational and resource issues, and in consideration of prospective conditions in areas critical to the continuing success of their students and colleagues in the arts disciplines now and in the immediate future.

Providing these principles as context, ACCPAS offers this third 2020 communication, similar in nature to those released previously, A Challenging Time – COVID-19 and Related Issues and Pressing Forward – Continuing Our Work During Uncertain Times. This communication offers a substantial amount of information in a variety of areas. Some information is pertinent to what our country and therefore we face from day to day. Some addresses changes to federal requirements. Some is pertinent to the long-term health and well-being of study in the arts, a concern which remains in our sights even though at times our daily attentions may be diverted elsewhere. Some may be pertinent to your current realities; some less so. Different schools have different missions and face different sets of realities. As suggested above, please study and consider the information below and all information in hand, and determine its applicability carefully, particularly as it may apply to your local situation. Should further information or analysis be required regarding the topics highlighted in this text or on other topics, seek specific guidance and wisdom from those with the expertise to assist you. Then, having developed confidence in your research and study, you will be in a good place to make broadly conceived decisions that will move initiatives on behalf of the work of your school or program forward. It helps to remember that decision-making is not a one-time event; it is an unfolding and ongoing process, in part because conditions are always changing. Each decision is merely a piece of a puzzle that must be solved for a time. The more volatile and unstable the conditions, the more difficult the daily and the long-term puzzles, and the more choices of answers there appear to exist.

FEDERAL INITIATIVES

Federal Financial Relief. The federal government has authorized the availability of approximately three trillion dollars in coronavirus relief aid in four separate actions approved over the last two months. A fifth consideration, the HEROES Act, has been approved by the House, but has yet to reach the Senate. Institutions taking advantage of the provisions of these Acts should conduct a careful review of their provisions, including the fine print. A brief but informative overview of the flow of funds is available here. ACCPAS encourages schools to remain abreast of ongoing developments. Specific information regarding the availability and use of these funds is available on the Department of Education coronavirus webpage (https://www.ed.gov/coronavirus?src=feature). Also of note as provided by the Appropriations Committee of the U.S. Senate is a summary of supplemental appropriations (direct federal spending) included in the CARES Act which was signed into law on March 27, 2020.
**Department of Justice Final Judgment.** CAAA has been following since 2017 a possible restraint of trade concern held by the Department of Justice (DOJ) as it may pertain to the National Association for College Admission Counseling (NACAC) specifically with regard to changes made by NACAC to its *Code of Ethics and Professional Practices* in 2017. Although NACAC amended its *Code* provisions in September of 2019, the concern resulted in a complaint filed by DOJ against NACAC in December of 2019 (see Federal Register dated January 10, 2020). Comprehensive information regarding the DOJ proceedings, which have now come to a close, may be found here. The DOJ Final Judgment dated April 17, 2020 may be found here. Given the provisions of the DOJ Final Judgment, CAAA will be offering in the form of Proposed Revisions to the ACCPAS Handbook 2020, modifications to specific provisions of the current ACCPAS Code of Ethics. A Notice of Proposed Revisions will be forwarded to representatives later this year following protocols articulated in the ACCPAS Handbook 2020. A vote of the Trustees of the Council of Arts Accrediting Associations is expected to be taken in January of 2021.

The text of the ACCPAS *Code of Ethics* remains unchanged at this time. However, when applying the provisions of the ACCPAS *Code*, it is suggested that institutions become mindful of and attentive to the provisions of the DOJ Final Judgment. Although certain specific activities are now prohibited as outlined in the DOJ Final Judgment, it is important to remember that 1) a hallmark of the work of ACCPAS accredited schools is the continuing and unwavering regard held for ethical practices that are fair, applied equitably, and continue to serve and protect both schools and students, and the field, and 2) such practices may be freely exercised absent the presence of articulated requirements. The *Code of Ethics* is based upon long-standing ACCPAS principles, which remain today. Approaches and initiatives which 1) uphold the spirit of the ACCPAS *Code* and the principles upon which it rests firmly, and 2) attend to the letter of the DOJ judgment should be considered as appropriate and can be implemented consistent with the provisions of each. Should questions arise, please contact the Executive Director directly.

**ACCPAS COMMISSION MEETINGS AND REVIEWS**

The submission deadline for consideration of institutional applications at the 2021 Commission meeting is November 15, 2020. Instructions regarding the nature and format of Commission submissions may be found at the addresses as follows: Optional Responses, Responses and Progress Reports, Plan Approval and/or Final Approval for Listing applications. Commission Action Reports will be sent to schools thirty days after the close of the meeting. At this time, ACCPAS requests that all submissions intended for review by the Commission in 2021 be submitted in hard and electronic copy (i.e., USB flash drive).

Should questions arise regarding ACCPAS reviews and submission requirements, please contact Adèle-Marie Buis (abuis@arts-accredit.org) in the National Office.

**POSTPONEMENT OF COMPREHENSIVE REVIEWS**

Schools finding it necessary to postpone comprehensive accreditation reviews from one academic year to the next (i.e., from 2020–2021 to 2021–2022) for good cause may wish to review ACCPAS’ *Policy on Postponements*. As a reminder, formal requests for postponements require approval and therefore should be submitted to the National Office. Should questions arise regarding the policy or its application, please contact Kathryn Omune in the National Office (komune@arts-accredit.org).

**SELF-STUDY SUBMISSION REQUIREMENTS SUBSEQUENT TO A POSTPONEMENT**
If a site visit has been postponed, updates and amendments may be offered as they pertain to a school’s Self-Study, but the Self-Study need not be rewritten and resubmitted unless the information provided within the original document is no longer reflective of the school’s operations, intentions, and initiatives. Should new information have come to light since the Self-Study was written/submitted, this information should be provided to the visiting evaluators and National Office prior to the visit, and to the Commission as part of an institution’s Optional Response submitted after receipt of the institution’s Visitors’ Report. Questions regarding submissions may be directed to Adèle-Marie Buis in the National Office (abuis@arts-accredit.org).

**ACCREDITATION STATUS IN LIGHT OF ANTICIPATED CHANGES**

A school making changes in direct response to unfolding circumstances may wonder whether ACCPAS will take an immediate action which could jeopardize the school’s current accreditation status. It is important to remember that all ACCPAS Commission reviews operate within an existing, established, and published system of due process—a system which opens conversations; welcomes dialogue; offers the opportunity to discuss comprehensively a school’s initiatives and, based on these initiatives, its ongoing ability to comply with standards; and comes to conclusion only after thorough consideration of all salient information has been accomplished (see ACCPAS Handbook 2020, Rules of Practice and Procedure, Article III., Sections 3.–5.). Changes anticipated should be considered in light of current standards. Should a school desire feedback regarding the potential impact of an anticipated change on the school’s continuing ability to comply with standards, please contact either Nora Hamme (nhamme@arts-accredit.org) or Paul Florek (pflorek@arts-accredit.org) in the National Office.

It is recommended that accredited schools continue to work with staff on one-to-one bases 1) as they consider possible ideas and options that will enable them to address existing and anticipated challenges; 2) to discuss the application of the national standards as they pertain to school initiatives and plans, particularly given modifications that are or will be necessary to address constraints resulting from the effects of the coronavirus; 3) as materials are being prepared for Commission review; and 4) in their ongoing efforts to attend to accreditation responsibilities. Please do not hesitate to contact members of the staff for assistance. A list of staff members and their assigned responsibilities is provided here.

Thank you for your continuing efforts and your fortitude. There is no question that the challenges faced are daunting, but as well, opportunities that may not have been evident in the past are arising, which may assist us to advance our work in ways previously not thought possible.

Cordial regards.

KPM:lo