



May 10, 2019

Council for Higher Education
One Dupont Circle NW, Suite 510
Washington, DC 20036

Re: Call for Public Comment: Accrediting Council for Independent Colleges and Schools

Dear Members of the CHEA Committee on Recognition,

Thank you for the opportunity to comment on your review of the Accrediting Council for Independent Colleges and Schools (ACICS) and whether it meets CHEA's standards of recognition. We at Veterans Education Success believe that ACICS has failed to "meet the recognition standards" of CHEA, and accordingly we urge the Committee on Recognition to deny ACICS' application for recognition.

Specifically, ACICS has violated CHEA's Standard #11 "DEMONSTRATES PUBLIC ACCOUNTABILITY FOR PERFORMANCE AND TRANSPARENCY." We believe that ACICS has failed to **"Provide for substantive and timely response by the accrediting organization to legitimate public concerns and complaints about an institution"** (11.A.2) and has also failed to **"Provide a procedure for the accrediting organization to take timely action to prevent substantially underperforming institutions or programs from achieving or maintaining accredited status."** (11.A.3).

As the attached research report documents, "[Student Outcomes at Colleges Approved by the Accreditor ACICS](#)" (Oct. 2018), serious concerns exist about ACICS' approval of substantially underperforming institutions and ACICS has failed to take action to correct this or to address legitimate public concerns and complaints about its underperforming institutions. In particular, that report analyzed the most recent U.S. Department of Education data to determine student outcomes at the approximately 100 schools still accredited by the Accrediting Council of Independent Colleges and Schools (ACICS). Our analysis found:

- ACICS students face much worse outcomes now than ACICS students faced in 2016.
- Seventy percent of students at ACICS-approved colleges earn no more than a high school graduate.
- ACICS students are twice as likely as other students to have unmanageable debt.

Throughout 2015-2018, widespread public concern was expressed about ACICS' failure to take action or address legitimate public concern about its underperforming institutions it approved. This included public letters, including this letter from [9 Veterans and Military Organizations to NACIQI Regarding the Renewal of ACICS as an Accreditor](#) (2016). It also included public hearings at NACIQI (at which we testified in June 2016) about ACICS' failure to address its underperforming institutions and instead placing such institutions on its honor roll.

Through these hearings and letters and the Department's review process, ACICS was clearly put on notice about public concern about its underperforming institutions, but failed to address those concerns. Most recently, political appointees at the Department of Education overrode the expert advice of career civil servants, choosing instead to resurrect ACICS.

Nevertheless, public concern remains regarding ACICS' failure to take action or address legitimate public concerns and complaints about its underperforming institutions.

ACICS was again notified about public concerns of Veterans and Military Service Organizations regarding ACICS, including through this letter from [30 Veterans and Military Service Organizations ask the Education Department not to reinstate ACICS](#) (Feb. 2018). "ACICS has done nothing in the past 13 months to suggest that it has taken sufficient steps to address its self-acknowledged shortcomings . . . ACICS cannot possibly meet the requirement that organizations demonstrate 2 years of successful experience with the law and regulations governing accreditors before seeking recognition."

Despite all this public expression of concern, ACICS has instead allowed its institutions to decline. Now, ACICS students face much worse outcomes now than ACICS students faced in 2016. This is a clear indication of ACICS' failure to take action and address legitimate public concern about its underperforming institutions in violation of CHEA's Standard #11.

Americans count on accreditors to put a stamp of approval on institutions only if they are truly worth taxpayer investment of Title IV and GI Bill funds and if they are worth students' time. Instead, ACICS has failed time and again, and is now getting worse.

We hope that the Committee on Recognition will review all of the evidence in the record, not just what has been provided by ACICS, and vote against recognition of ACICS. Thank you very much.

Sincerely,



Carrie Wofford
President
Veterans Education Success