



UNITED STATES DEPARTMENT OF EDUCATION

May 25, 2023

By e-mail transmission only

Michale S. McComis, Ed.D.
Executive Director
Accrediting Commission of Career Schools and Colleges
2101 Wilson Blvd., Ste. 302
Arlington, VA 22201

Dear Dr. McComis:

I am writing to inform you of my decision with respect to the application for renewal of accreditation recognition of the Accrediting Commission of Career Schools and Colleges (ACCSC). U.S. Department of Education (Department) staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) each made recommendations to me under section 114 and 496 of the Higher Education Act of 1965, as amended, and pursuant to relevant statutory and regulatory provisions. Department staff recommended that I continue ACCSC's recognition as a nationally recognized accrediting agency for a period of five years; NACIQI, at their July 2021 meeting, recommended continuing recognition for a period of three years. ACCSC submitted written comments under 34 C.F.R. §602.35 on August 10, 2021, in which it argued that NACIQI's recommendation should not be followed because the recommendation was: incomplete and not correlated to any recognized regulatory rationale; not based on the record; and lacked due process.¹ ACCSC requested that I renew the agency's recognition for the five-year period recommended by Department staff.² Due to the emergence of

¹ Letter from Dr. McComis, ACCSC, to Deputy Under Secretary Matsudaira (Aug. 10, 2021).

² On October 1, 2021, I received a letter dated September 20, 2021, that was sent to Secretary Miguel Cardona by a coalition of advocacy groups. In this letter, the groups advocated for a maximum three-year renewal of ACCSC's recognition, citing discussions at the NACIQI meeting leading to the Committee's recommendation. The coalition also asked for the Department and NACIQI to make changes to their accreditation review processes, including using the negotiated rulemaking process and guidance. The coalition's letter was forwarded along with a letter from Department counsel identifying the procedural considerations accompanying whether and how to consider the coalition's letter as part of the present decision-making process. ACCSC responded on October 8, 2021, requesting that I not consider the letter as new information under 34 C.F.R. §602.36(h). I agree with ACCSC: the coalition's letter does not constitute new information that requires consideration under 34 C.F.R. §602.36(h). The information cited to is all found in the transcripts of the NACIQI meeting and elsewhere in the record properly compiled under

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The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

information related to the closure of institutions owned by the Center for Excellence in Higher Education (CEHE), which occurred near-contemporaneously with the July 2021 NACIQI meeting, on July 29, 2021, I requested additional information and written responses from ACCSC and Department staff under 34 C.F.R. §602.36(h)(2). ACCSC provided its written response and additional information on January 10, 2022; Department staff provided their written analysis of the additional information and accreditation recommendation on March 25, 2022.

I appreciate your patience and willingness to submit additional information as I conducted a thorough review of the record before me.

The role of accrediting agencies is incredibly important and requires that high levels of trust be placed in those agencies as they provide broad protections and assurances within the realm of higher education. Accrediting agencies have a fiduciary duty to students, who rely on them to provide meaningful oversight of institutions of higher education and programs at which those students use their resources, undertake student debt, and invest years of their lives in order to obtain meaningful education and increased opportunities for their futures and the futures of their families. Accrediting agencies also hold a position of trust with the American public to act as a fiduciary of taxpayer money. Institutions of higher education that are accredited by federally-recognized accrediting agencies are responsible for educating nearly 20 million students in numerous types of degree and non-degree-granting programs, and stewarding over \$110 billion in Title IV funds every year. It is of paramount importance that each federally-recognized accrediting agency approach its role with a circumspect and thoughtful eye to its public service duty.

Department of Education staff conduct careful reviews of accrediting agencies, including site visits and ongoing dialogue, before producing a comprehensive final staff report and recommendation for continued recognition. During their meetings, NACIQI has the opportunity to hear from Department staff, agency representatives, and third-party commenters, and raise questions about the review directly with staff and agency representatives, before providing their own recognition recommendation. When I receive the recommendation of Department staff, I accept it with the good-faith knowledge that it represents the thoughtful work of capable public servants who are dedicated to following statutory and regulatory law. I receive NACIQI's recommendation with the assured knowledge that each of the members of this diverse and thoughtful committee, who have all pledged to undertake this important role, have reviewed the

34 C.F.R. §602.36(a). In my opinion, the coalition letter constitutes advocacy by a third party that would have been appropriately submitted as part of the Department staff or NACIQI review and recommendation process. The regulations at 34 C.F.R. Part 602 do not contemplate a new opportunity for public comment at this stage in the decision. For that reason, and because it does not contain any new information relevant to the recognition decision before me now, I decline to consider the coalition letter in reaching my decision.

record before them and brought their concerns and questions to the agency before making a recommendation decision. It is then my job to carefully review both of those recommendations and the record before me. In my review, I appreciate the roles and expertise of Department staff and NACIQI, strive to provide regulatory consistency for accrediting agencies, and seek to make decisions in a way that adheres to the accreditation regulations and accounts for the public interest, as well as what's best for students.

I expect that all agencies recognized by the Department will approach their role with humility and with a keen eye toward protecting the public trust. I understand that the accreditation recognition process is long, and can be arduous for the staff involved in preparing materials and reports, participating in site reviews, and working to resolve questions. This is all part of a process that is vital for providing necessary procedural protections for agencies, institutions, and students. I trust that you recognize and appreciate that and look forward to a continued partnership between ACCSC and the Department that reflects a spirit of good will and a focus on opportunities to improve the academic experiences of the students who rely on us all.

Background

Prior to the July 2021 NACIQI meeting, Department staff found ACCSC in compliance with all recognition criteria and recommended renewal for a period of five years. Third party commenters at the NACIQI meeting included both individuals familiar with, or who had participated in ACCSC's accreditation process, who expressed confidence in the agency's review, and representatives from the Third Way, Veterans Education Success, and Center for American Progress, who expressed significant concerns about the lack of consideration given by ACCSC to student outcomes and institutional wrongdoing. NACIQI then discussed the record before them, including presentations by Department staff and ACCSC representatives. The general consensus during their discussion was that a five-year renewal was inappropriate, given outstanding questions about student debt issues, poor student outcomes, issues related to institutional misconduct, and other concerns. Recognizing that their concerns were not cleanly tied to any specific recognition criteria, but rather to the facts and data before them as part of the Dashboard review, NACIQI members discussed potential recommendations that would register their discomfort with ACCSC's accreditation performance, while ensuring that the recommendation was fair and made on a coherent, rational basis. NACIQI ultimately recommended renewing recognition for a period of three years.

On July 29, 2021, after NACIQI voted on its recommendation for ACCSC, representatives from CEHE, owners of the California College of San Diego, CollegeAmerica Phoenix, Independence

University, and Stevens-Henager College, which were accredited by ACCSC, provided notice to the Department that the institutions would permanently close on August 1.³

In my October 27, 2021, initial letter, I stated that the closure of CEHE, as well as its timing, were troubling. In particular, I questioned the lack of evidence or analysis in the record of how ACCSC was addressing CEHE in a way that complies with their own accreditation standards. In raising these concerns, I reiterated that “my role [as the Senior Department Official (SDO)] is not to monitor the actions of individual institutions” and is instead, “in part, to evaluate how accrediting agencies respond when the institutions they accredit fall out of compliance with, or take actions that are counter to, the agency’s accreditation standards.”⁴ In an effort to gain further understanding of the CEHE closure and ACCSC’s review of their institutions, I requested additional information and response from ACCSC Department staff with respect to: (1) the closure of CEHE’s institutions, and whether ACCSC’s actions followed enforcement timelines under 34 C.F.R. 602.20; (2) The April 2021 withdrawal of accreditation from Independence University, in particular with respect to ACCSC’s adherence to its own written standards and federal regulations in monitoring and responding to the institution’s long-term compliance issues; and (3) the Colorado District Court findings regarding CEHE’s reported employment data, in particular with respect to whether ACCSC should have discovered CEHE’s fraudulent practices under their own accreditation standards and monitoring protocols and what steps it has taken to change its standards and policies in response. In that request, I asked for a response with respect to three recognition criteria: (1) 34 C.F.R. §602.16(a)(1)(i) – Student Achievement; (2) 34 C.F.R. §602.19(b) – Monitoring and Evaluation; and (3) 34 C.F.R. §602.20(a) – Enforcement of Standards.

On January 10, 2022, ACCSC sent a responsive letter and accompanying materials. In its correspondence, ACCSC passionately defended its record as an accrediting agency, specifically with respect to their monitoring activities for institutions who are not fully meeting the ACCSC benchmark rates and Standards of Accreditation. ACCSC provided a detailed narrative of the methods it uses to monitor the institutions and programs that it accredits, and the graduated actions that it takes to help those institutions and programs who do not meet its Standards improve, including heavy use of benchmark measures to identify and address areas of concern.

Department staff responded with their own analysis on March 25, 2022, again finding ACCSC in full compliance.

³ See, Department of Education, Office of Federal Student Aid, *Information for Students Affected by the Closure of Center for Excellence in Higher Education Schools*. <https://studentaid.gov/sites/default/files/cehe-closed-school.pdf>. ACCSC had moved to withdraw accreditation from Independence University in April 2021, and that decision was under appeal at the time of CEHE’s announcement.

⁴ Letter from J. Matsudaira, SDO, to Dr. M. McComis, ACCSC (Oct. 27, 2021).

I found it illuminating that ACCSC opened their responsive letter by defining their understanding of the role of accreditation:

At the outset, it is important to establish that accreditation at its core is a quality assurance and institutional improvement process and, while it is concerned with accountability (particularly with regard to student achievement), it is not, fundamentally, a punitive process. Accreditation is designed to guide continuously improved school performance within a consistent review and assessment paradigm – one that considers a wide array of subjective factors and allows institutions an opportunity to demonstrate improvement over time.⁵

While I do not disagree that ACCSC’s statement captures a portion of their role and responsibility, and certainly agree that accreditation should not be reduced to a process solely focused on punishment, I believe that the agency’s characterization misses some key elements. Most notably, ACCSC does not take make mention of the thousands of students who rely on their evaluation and accreditation of institutions when making the college and degree decisions that require direct investments of years of their lives, and significant financial and other resources, balanced with the promise of a good education and the assumption it will lead to remunerative employment in, or related to, their chosen field. ACCSC also does not include its fiduciary duty, as the accreditor of Title IV programs and institutions and gatekeeper to federal funds, to the American public, whose tax dollars are invested in students and higher education programs and institutions, with the understanding that those programs and institutions will provide meaningful education that will lead to the recouperation of taxpayer dollars. Accrediting agencies do not owe fealty to the programs and institutions they accredit, and ultimately should not put the continuation of struggling programs and institutions above the interests of students seeking a quality education and upward mobility.

While ACCSC has noted in its January 21st letter that it “has on multiple occasions, provided the Department with extensive information and documentation relating to its accreditation of all CEHE-affiliated schools,” as the SDO, I can only review what was in the record before me and information and documentation provided to the Department prior to this review were not previously a part of that record.

602.16(a)(1)(i) Student Achievement.

I asked ACCSC to provide evidence of how the agency evaluates student achievement metrics in a way that is consistent with section 602.16(a)(1)(i)’s directive that an agency’s standards are *sufficiently rigorous to ensure that an agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits*. I also asked as a part of evaluating the criteria, to provide

⁵ Letter from Dr. M. McComis, ACCSC, to J. Matsudaira, SDO (Jan. 10, 2022) pp. 1-2.

evidence of how ACCSC, through the use of site team visits, or other policies and procedures, evaluates student achievement metrics, and particularly the agency's evaluation of employment classification in accordance with ACCSC's standards to ensure consistency with the institution's or program's mission. ACCSC provided its policies and supporting documentation to demonstrate how the agency evaluates student achievement. It addresses its evaluation and monitoring practices related to student achievement, including the evaluation of employment classification under 602.19(b) and 602.20 so those items are addressed further below.

Section 602.16(a)(1)(i) requires that an agency must demonstrate that it has standards for accreditation and preaccreditation that *are sufficiently rigorous to ensure that the agency is a reliable authority regarding the quality of the education or training provided by the institutions or programs it accredits*, and will be found to meet this requirement if certain conditions are met, including that its accreditation standards set forth *clear expectations with respect to student achievement* in relation to the institution's mission (emphasis added). My review of the record does not show ACCSC to be out of compliance with the customary Department interpretation of the basic requirements of section 602.16(a)(1)(i).

In order to maintain a robust and responsive approach to accreditation, however, I urge ACCSC to consider using other widely available data on student achievement, if for no other reason than as an internal quality control to ensure that the existing measures it uses to monitor the quality of programs at institutions it oversees are valid.

I recognize that it is not the role of the Department, NACIQI, or myself as SDO, to pick which measures of student success accreditors use – the accrediting agency has discretion to set their own standards and benchmarks. However, the accreditor *does* have a regulatory mandate to create and apply those standards in a manner that allows them to effectively monitor the quality of the institutions they oversee. While ACCSC has set clear quantitative standards of performance, I am not convinced that the metric the agency seems to put the most weight on – job placement rates – allows them to engage in sufficiently effective monitoring. As applied, ACCSC-accredited institutions have a significant amount of discretion and flexibility in how they measure job placement. Even discounting the intentionally deceptive practices of CEHE, the lack of uniformity between institutions makes this an unreliable measure of student success. A 2021 study⁶ from the Brookings Institute suggests that for short-term programs, job placement rates may be poorly correlated with other higher-quality measures of students' labor market outcomes. With respect to ACCSC's programs, I am particularly concerned by the

⁶ Stephanie Riegg Cellini and Blanchard, Kathryn J., *Quick college credentials: Student outcomes and accountability policy for short-term programs* (July 22, 2021), available at: <https://www.brookings.edu/research/quick-college-credentials-student-outcomes-and-accountability-policy-for-short-term-programs/>

Gainful Employment Informational Rates data⁷ that the Department released during the March 2022 Negotiated Rulemaking session, which shows concerning low performance among programs at ACCSC institutions, with nearly 40 percent of programs that report debt and earnings information showing earnings below those of a typical high school graduate, using the intermediate high school earnings measure identified at the meeting.

I bring up this study and data, which I acknowledge are outside of the scope of the current review, not as a basis by which to make any finding of noncompliance, but as an opportunity to urge the agency forward into engagement with more meaningful measures of student outcomes. It is necessary to reexamine how data might be used to inform and amend best practices. While I acknowledge that this will look different between agencies, and may even vary in application by individual agencies, I expect accreditors to incorporate the highest quality data available in reviewing student achievement at the institutions and programs they accredit. I urge ACCSC and other agencies to engage with the Department's reinstated Accreditor Dashboard or the underlying data published through the College Scorecard, and ongoing efforts by the Department, institutions, and experts, to refine how data is collected, presented, and disseminated, and how it might be used to evaluate and shape our understanding of higher education.

In addition, I do not find the application and use of programmatic benchmarks alone to be convincing for reasons I will discuss in additional detail under 602.20. As an institutional accreditor, ACCSC's policies require that "[t]he school demonstrates successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education as well as acceptable pass rates on licensure/certification examples where required", yet the policy states that these rates are supported through transcripts, verifiable records, and documentation of initial employment of its graduates" and do not include a similar focus on benchmark outcomes at the institutional level. One of the challenges in ACCSC addressing systemic issues at an institution, by ACCSC's own acknowledgement, is that programmatic outcomes fluctuate. As some rise above benchmark rates, others fall below, and the narrow focus on program outcomes without larger consideration of the institution as a whole limit the ability to take a determinative action.

I welcome discussion of what other data the Department might be able to make available through Accreditor Dashboard or other outlets to ACCSC and other accrediting agencies to facilitate the effective measure and monitoring of student outcomes.

With each change in how institutions operate, increase in the amount and quality of the information available, and change in the needs and challenges faced by students, we all

⁷ Available at: <https://www2.ed.gov/policy/highered/reg/hearulemaking/2021/geinforateapril2022.xlsx>.

have a duty to evaluate opportunities to improve how we demand excellence from institutions. Our students deserve better, accrediting agencies have the flexibility to do so, and the Department has the authority to require so, under the existing regulations. It is my hope that ACCSC will take a fresh look at how it gauges student achievement in the diverse set of institutions it accredits and feel empowered to require more.

602.19(b). Monitoring and Evaluation.

I also asked ACCSC to provide evidence that it effectively applies monitoring and evaluation approaches that demonstrate not just whether employment rates are accurate, but whether graduates listed as employed should be counted as such based on the agency's employment classifications. In addition, I asked that ACCSC demonstrate that it effectively applies monitoring and evaluation approaches to identify problems with employment classification and that these approaches are effective in identifying problems. This request was made based on findings of a Colorado court that were not fully addressed in the original record. ACCSC provided additional documentation demonstrating the processes ACCSC uses to evaluate and monitor compliance with student achievement standards. The processes include annual reports, program benchmarks, third-party verification of job placement rates in evaluating employment, and on-site visits to monitor and evaluate compliance. The evidence demonstrates that ACCSC effectively detects problems and monitors institutional compliance.. I appreciate the additional information provided by the agency, as well as Department staff's analysis.

Based on my review of the additional information provided, I find ACCSC in compliance with section 602.19(b).

602.20(a). Enforcement Standards.

Finally, I asked ACCSC to provide evidence that it takes appropriate action and adheres to its written timeline when it finds an institution or program out of compliance with agency standards and issues a warning or other enforcement action.

Reviewing the record, including the additional materials provided by ACCSC, I find significant evidence to support the agency's claim that they engage in meaningful and sustained efforts with programs and institutions that are struggling to meet the benchmarks set by ACCSC. I applaud their efforts to work with those programs and institutions as they seek to improve outcomes for their students.

However, as stated above, in reviewing the record before me, I continue to have concerns about ACCSC's narrow focus on outcomes within particular programs without a larger consideration of institutional performance and the implications this has on demonstrating meaningful systemic improvement at an institution and effectiveness of the agency.

I would like to address one of the assumptions behind the request for additional information. In its January 2022 response letter, ACCSC states:

“First, the letter appears to assume that, whenever an academic program misses a program-specific student achievement benchmark (i.e., a graduation rate or employment rate), the entire program or institution is “out of compliance” with the Standards of Accreditation, triggering an enforcement action against the program or entire institution. As a result, the SDO’s letter misconstrues the trigger for the regulatory maximum timeframe for compliance enforcement.”

Based on a detailed review of the documents, and by ACCSC’s own admission, on multiple occasions, the record of evidence suggests that the issues at the system of schools were systemic, widespread, and occurred over many years, whether or not the agency made a determination of noncompliance at any particular point.

For example, in a 2013 show-cause letter from ACCSC to CEHE, the commission required demonstration of compliance on a range of issues including student achievement and expressed concern “as to whether there are systemic issues...throughout the CEHE schools under consideration.” (Exhibit AB). Issues with student achievement that were systemic and ongoing are referenced at multiple points in the record (Exhibit E, Exhibit Y).

As indicated throughout the record, just because ACCSC does not make a determination of non-compliance does not mean that the institution is fully in compliance. For example, consider the record of actions in the case of CollegeAmerica-Denver (CA-Denver). In a background summary about its monitoring of CA-Denver, ACCSC provided an excerpt from a Commission letter from December 21, 2012, placing limits on enrollment in every program due to persistently low rates of student achievement. The excerpt notes “the student achievement issues have been systemic and on-going.” In July 2013, ACCSC issued the show-cause order mentioned above, which included CA-Denver (Exhibit E). In January 2014, the show cause order was continued for CA-Denver which “continued to report low outcomes in a majority of the school’s programs.” In December 2014, the agency noted that “CA-Denver continued to report low outcomes in a majority of the school’s programs...and continued failure to demonstrate compliance with student achievement standards would result in further programmatic and institutional actions.” In June 2015, ACCSC noted that CA-Denver continued to report low outcomes in a majority of the school’s programs.” It directed the school to demonstrate it had been in continuous compliance with standards, and voted to place the school on probation. Over the course of these actions, the agency notes a series of other actions related to litigation reporting, advertising reporting, and a constant series of complaints and investigations of the institution. In December, 2015, ACCSC noted that “CA-Denver reported above-

benchmark rates for two programs and lifted the previously imposed enrollment caps. It also had taken action to discontinue two programs with a history of below-benchmark rates. Because the school appeared to be taking action, the ACCSC voted to vacate the Probation Order but remained on warning since the school had “yet to demonstrate compliance with accrediting standards after three years of monitoring.” This series of events occurred over the course of three years, seemingly without meaningful improvement.

Although ACCSC notes in its response that an enforcement action such as warning does not indicate non-compliance, it is not clear to me where in this summary whether the agency determined that CA-Denver had fallen out of compliance, and how the process is intended to develop, including when the show-cause order ends to be able to determine when and if a timeline was ever applied.

While ACCSC alleges that the actions it takes are intended to lead to performance improvement, it is not clear that improvement for CA-Denver or other campuses ever occurred. The 2018 system wide-probation order that ultimately led to removal of accreditation lists the long history of actions noting the “widespread and persistent below benchmark rates...throughout the system” and “pervasive student achievement outcomes that do not meet ACCSC’s benchmarks.”

I remain concerned, and the record confirms, that the sole focus on programs in assessing student achievement prevented meaningful enforcement action. ACCSC noted that it has provided extensive information and documentation relating to its accreditation of CEHE schools to the Department on several occasions. In 2018, a Department letter from Herman Bounds to ACCSC raised concerns about whether ACCSC had taken an action to renew accreditation for CA-Denver in over 10 years (Exhibit D). In response, ACCSC states that it has attempted to ascertain the school’s compliance with accreditation standards over a significant period of time, but the school had so many issues that it made ACCSC’s ability to reach a conclusion difficult. ACCSC itself acknowledges the concerns of which I share, stating that “the Commission has been diligent but has been stymied from taking institutional action. By way of example, as ACCSC assessed each program’s outcomes, the Commission found it difficult to take institutional actions because individual program performance would fluctuate.”

ACCSC’s actions may meet the letter of its policies aligned with Department regulations, allowing it to find issues, monitor and evaluate institutions, but the record raises serious questions about whether these policies are effective. As I have acknowledged, my role is not to evaluate responses to individual institutions, but rather the record as a whole and how accrediting agencies respond when the institutions they accredit fall out of compliance. In this particular instance, the record before me is focused on one system of

schools and lacks the full documentation and history of events for each of the institutions in their entirety which makes a determination difficult to achieve.

I continue to have serious concerns with ACCSC's seeming hesitancy to make findings of noncompliance after extensive engagement with programs and institutions that do not show meaningful systemic improvement, the implications for the agency's ability to determine noncompliance through its narrow focus on individual programs, and the overall effectiveness and its impact on students. The ACCSC compliance standards offer an array of opportunities for guidance and improvement to institutions, as well as the possibility of findings of consequences; however, it seems that in practice, whether or not struggling institutions show real, meaningful improvement over time, ACCSC leans heavily on continued soft monitoring, and avoids engaging in meaningful enforcement.

Going forward, I ask ACCSC to consider whether this approach has, over the long term, been in the best interest of the students whose interests they serve. While I absolutely support the role of accreditation in identifying and supporting meaningful opportunities for institutions to improve their performance, there comes a point where failing institutions, sustained by the possibility of marginal improvement, should not be allowed to continue to benefit at the expense of students and at a risk to taxpayers. In reviewing the record, there was not sufficient evidence to find ACCSC out of compliance with section 602.20(a); however, I ask that you spend the time before your next recognition review to consider changes in standards and emphasis in enforcement that may incentivize more rapid and systemic improvement in some institutions, and identify those that perhaps do not belong in the domain of higher education.

I also ask that Department staff closely review the concerns I have raised here on a broader scale across institutions in determining whether the agency's policies are effective.

I would like to pause here, and again express my thanks to ACCSC and Department staff for going through the process of providing additional information and thoughtful analysis. I do not take my role as Senior Department Official lightly, and seek to make decisions rooted in regulatory consistency that also recognize evolving challenges and opportunities in the world of higher education. At the heart of it, our collective responsibility is to perform our functions and duties with an eye to detail, a commitment to creative approaches to improving the experience and outcomes of higher education, and a recognition that we are trusted with safeguarding our country's students as they seek to better their own futures and our collective tomorrow.

Finally, I note that while not part of this review, ACCSC has taken over the role of accreditor for a number of schools formerly accredited by ACICS. I thank you for working with the Department and those institutions to provide continued educational opportunities for affected

students, and urge you to consider carefully your duty in providing oversight and guidance for these institutions and their students.

Decision

In July 2021, Department staff recommended that I continue ACCSC's recognition as a nationally recognized accrediting agency for five years; NACIQI recommended that I continue ACCSC's recognition for three years. After careful review of the record, I renew ACCSC's recognition for a period of three years. I recognize that there is not a neat solution in this case. I am not finding ACCSC out of compliance with the recognition criteria they were reviewed under, and yet certain of the agency's practices seem to demand improvement. I considered numerous options, including monitoring reports, or even a finding of noncompliance. On balance, however, I feel that it is in the best interest of the resources of the Department staff and ACCSC, and not contrary to the interests of students and federal resources, to move forward with a slightly shorter time between full reviews. This gives the Department and the agency the benefit of a full recognition review under the newly revised regulations, while giving the agency time to consider some of the policy suggestions surrounding student achievement and compliance that I have shared my concerns about here.

Accordingly, I continue the Department's recognition of ACCSC as a nationally recognized accrediting agency within the scope of recognition as detailed below for a period of three years from the date of this letter.

Scope of recognition: The accreditation of postsecondary, non-degree-granting institutions and degree-granting institutions in the United States, including those granting associate, baccalaureate, and master's degrees, that are predominantly organized to education students for occupational, trade and technical careers, and including institutions that offer programs via distance education.

Sincerely,

Jordan Matsudaira
Deputy Under Secretary