Case Name: In the Matter of Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-8
34 CFR 600.13(a)
Acceptance of ACICS Standards, Policies, Procedures and Decisions
By
ACICS Affiliated Educators

Herman Bounds Jr., Ed.S., Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
Accreditation Group
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Director Bounds:

I am writing to you in my role as a Lead Pharmacy Technician and Massage Therapy Program Instructor for the Harris School of Business in Linwood, New Jersey to provide evidence that supports the acceptance of the standards, policies, procedures and decisions of the Accrediting Council for Independent Colleges and Schools (“ACICS”).

In my current role, my responsibilities include instructing a comprehensive 7 month classroom based course load covering all aspects of ambulatory, institutional, out-patient, closed door and compounding pharmacy settings. I also supervise enrolled students for the Pharmacy Technician Certification Exam and Massage Therapy National Certification Exam. I coordinate intern site rotations, grow student retention rates by ensuring productive course outlines relative to current industry trends, resolve issues, update and change classroom instructional models to improve organizational effectiveness and student productivity.

I have been informed that ACICS has an initial petition for recognition under 34 C.F.R. Part 602 pending with the U.S. Department of Education (“Department”). Those requirements include basic eligibility requirements including that ACICS demonstrate the following:

§602.13 Acceptance of the agency by others.
The agency must demonstrate that its standards, policies, procedures, and decisions to grant or deny accreditation are widely accepted in the United States by --

(a) Educators and educational institutions; and

(b) Licensing bodies, practitioners, and employers in the professional or vocational fields for which the educational institutions or programs within the agency’s jurisdiction prepare their students.
As an educator at the Harris School of Business, which is a member of the Premier Education Group and current ACICS accredited institution, I have familiarity with ACICS criteria, policies, procedures and decisions. I have been asked to volunteer on ACICS site visit teams as a curriculum specialist as well as on other committee accrediting boards which supported the ACICS review, revision of standards and agency policies and procedures.

My educational background includes a Bachelor of Science in Community Health and Biology, a Certified Pharmacy Technician for over 18 years and a New York Licensed Massage Therapist with New Jersey registration and National Certification. I also have several years of experience participating as a Curriculum Specialist volunteer for another accrediting agency and have a point of reference, therefore, to compare ACICS Criteria and policies against those of other recognized accrediting agencies.

In my experience, ACICS Criteria, policies, procedures, and decisions and its application of same to accredited institutions, are at least as rigorous as those of other recognized accrediting agencies with which I have experience including ACCET. The strengths of specific ACICS standards, policies, procedures and decisions, include the areas of: institutional career mission, institutional organization and administration, admissions and marketing, student relations, satisfactory student progress, consumer information, faculty evaluation, library and resources, facilities and equipment, program effectiveness, outcomes (graduation, placement, and licensing benchmarks) which are well above any standard evaluation.

In my experience, ACICS standards are accepted by educators as effective in ensuring that graduates from ACICS accredited institutions are prepared for the occupations for which the programs prepared graduates and also prepare students to successfully transfer or continue their education at institutions accredited by other recognized accrediting agencies.

Please consider this letter as support for ACICS’s wide acceptance by educators for purposes of 34 C.F.R. 600.13(a).

I can be reached at (b)(6) in connection with this letter of support.

With Utmost Respect,

David G. Oldenhage, BS, CPhT, LMT, NCBTMB
Lead Pharmacy Technician Program Instructor
Massage Therapy Program Instructor
Harris School of Business
1201 New Road
Linwood, New Jersey 08221
American University in Bosnia and Herzegovina

Dec. 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S. W.
Washington, DC 200202

Letter of support from American University in Bosnia and Herzegovina

Dear Mr. Bounds:

I have taught for nearly 2 decades and currently serve as the Academic Advisor for the American University in Bosnia and Herzegovina (AUBiH). I am considered one of the Old Guard of Ex-Pats that have worked in American Education in a foreign field for the past 18 years. My resume is likewise attached to certify my credentials.

This letter is to communicate the values that have benefited our Institution and likewise the ways in which ACICS has benefited the greater Bosnian Education Institutions thru our circle of Influence with other educators with Best Practices and Standards of Conduct and Institutional Integrity. As a country struggling with a Post-Socialist backdrop and struggling National identity, ACICS has provided framework, counsel, and clear standards for academic excellence. Our students recognize that some of the conflicts in Bosnian education arise from Bosnian nationalistic efforts and are unrelated to Academic Integrity. Whereas, ACICS efforts and accreditation has been the standard that distinguishes AUBiH from Bosnian State Schools.

As an educator, I strongly support the efforts ACICS takes to strengthen Academic standards and its continuing pursuit of excellence. This letter should be viewed as the support for restoration of ACICS efforts.

Prof. Tom Trowbridge
Academic Advisor/ Academic Affairs

cc Student Services

AMERICAN UNIVERSITY IN BOSNIA AND HERZEGOVINA
Address Tuzla: Mije Keroševića Guje 3, 75000 Tuzla, Bosnia and Herzegovina; Tel: +387 (0)35 321 050; Fax: +387 (0)35 321 068
E-mail: contact@aubih.edu Web: http://www.aubih.edu

AUBIH, OB, AS, 10, 6-11
"...I wasn't expecting much from this topic but I was so wrong. This is the type of teaching that engages me and motivates me to do more...."

Seminar Feedback
American University Business Club Seminar Nov. 16, 2012

Prof. Thomas D. Trowbridge
Mrakusa 1, Sarajevo 71000
Bosnia i Herzegovina
academicadvisor@aubih.edu

Professional Profile

Career #1.
Experienced Corporate Trainer with Electrical Engineering background. Initially retired after 25+ years of Heavy Industry and Steel Manufacturing with Arcelor Mittal. Currently engaged in a second career teaching Accounting, Economics, and Best Business practices both corporately and academically. Eager to share a passion for education, vision, and boldness for new generations.
- Holds Master Degree in Business Administration
- Doctoral Candidate Thesis Completed Applied Economics.
- Experienced communicator and small group discussion leader.
- Dedicated to enthusiastic and dynamic teaching as a means of creating and nurturing a lifelong love of knowledge in all people.

Career #2
Experienced Educator with experience with University of Maryland, Europe Division, Camp Butmir, and The American University of Bosnia and Herzegovina.

4 years experience teaching Economics University of Maryland
7 years experience teaching Economics and Accounting American University
4 years experience directing Student Services and Academic Advising AUBiH

Education, Honors, and Certifications

MBA Masters of Business Administration
Keller Graduate School
225 W. Washington St. Chicago, IL 1999

Bachelor of Art Business Administration
Bethel College
1001 West McKinley Blvd. Mishawaka, IN 1992

Journeyman Certification Electrical Engineering Technology
Purdue/Inland Steel Company
2200 169th St. Hammond, IN 1981

Associates Business Management
Bethel College
1001 West McKinley Blvd. Mishawaka, IN 1977

Key Awards
Awarded 10,000.00 US Dollars by Arcelor Mittal in 1998 for research designed and implemented to improve Charging Practices and Environmental control improvements which resulted in improved environmental compliance and at a reduced manufacturing cost. Implementation was achieved within 6 months with 10 year life accrue.

Awarded a second bonus of 10,000.00 US dollars Arcelor Mittal in 1999 for research
of statistical processes that when implemented significantly improved product yield of Coke generation. This was essentially a statistical theft problem where productivity yields were overstated by fraudulent practices resulting in Bonus payments to fraudulent participants.

**Employment**

**Professional Development in Education**
- **Acting Provost and Academic Adviser**, December 2012 to present
  American University Bosnia and Herzegovina Sarajevo, Bosnia
- **Professor Economics**, May 2001 to 2012
  University of Maryland Europe Division 2001-2005
  American University Bosnia Herzegovina 2006-2012
- **Corporate Trainer**, November 1997-1999
  Educational Systems Workshops Dyer, IN

**Professional Development in Business Administration**
- **Electrical General Foreman**, 1995-2000
  Inland Steel/Arcelor Mittal
  #2 Basic Oxygen Furnace
  East Chicago, IN
- **Front Line Supervisor of Production**, 1988-1995
  Inland Steel/Arcelor Mittal
  #9 Coke Battery
  East Chicago, IN
- **Electrical Journeyman**, 1979 to 1988
  Inland Steel/Arcelor Mittal
  14” Bar Mill
  East Chicago, IN

**Professional Development in Humanities**
- **Director MRN Sarajevo Bosnia** 2001-2003
  Halida Kajtaza 64, Sarajevo, Bosnia
- **Director Nova Nada za Bosnu**, 2003-2006
  Vrazova 7, Sarajevo Bosnia
- **Chaplain D.O.D. U.S. Army**, 2007 to Present
  Butmir Base, Stup, Sarajevo

**Professional Affiliations**
Licensed Private Pilot 600 hours of Flight time with 100 hours of Instrument time
Old Car Aficionado, restoration and operation of classic muscle cars from 1950-1985
December 13, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at the American University in Bosnia and Herzegovina (AUBIH), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies and ministries. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know whom to call at ACICS to get quick answers to their queries.

As an educator at AUBIH, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of my support for the agency and the quality it ensures for institutes of higher education.

Sincerely,

Padraic F. McMickle, MPhil

Faculty Member at the American University in Bosnia and Herzegovina

American University in Bosnia and Herzegovina
Mije Kerševića Gruje 3, 75000 Tuzla, Bosnia and Herzegovina Tel: +387 35 321 050; Fax: +387 35 340 100 ID Broj: 4209750670009 E-mail: contact@aubih.edu Web: http://www.aubih.edu
December 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as a faculty member at Southern States University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). You can find my profile on the list of faculty: http://www.ssu.edu/academics/faculty/

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Distance Education Accrediting Commission (DEAC), Southern Association of Colleges and Schools, Western Association of Schools and Colleges, and the Accrediting Commission of Career Schools and Colleges. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at Southern States University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Shane C. Riley, Dr.P.A.
sriley@ssu.edu
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Eddie C. Sturgeon
Faculty Member at California International Business University
EDDIE C. STURGEON
250 East Main Street
El Cajon, California 92020

RÉSUMÉ

EDUCATION

1970 to 1973         J.D., University of Santa Clara School of Law
1965 to 1970         B.A., California State University, San Diego
                      Major: Economics; Minor: Accounting, Political Science

COURTS ADMITTED TO PRACTICE

1974                 Supreme Court of the State of California
1974                 United States District Court, Southern District of California
1976                 United States Court of Appeals, Ninth Circuit
1978                 Supreme Court of the United States of America

EXPERIENCE

1998 to present      Judge of the San Diego Superior Court
1988 to 1998         Judge of the El Cajon Municipal Court
1980 to 1988         Eddie C. Sturgeon, A Professional Law Corporation
1976 to 1980         Tolman, Miller & Sturgeon, Law Partnership
1974 to 1976         Tolman & Lorello, Law Associate

ACTIVITIES

• Assistant Presiding Judge of El Cajon Municipal Court
• Board of Directors of San Diego County Judges Association
• Past President of Foothills Bar Association of El Cajon
• Judge Pro Tem of the El Cajon Municipal Court
• Judge Pro Tem of the San Diego Superior Court
• Past President-Elect of Foothills Bar Association
• Past Vice President and Secretary-Treasurer of Foothills Bar Association
• Board of Directors of Foothills Bar Association
• San Diego County Bar Association
• Delegate, State Bar of California 1984-1985
• Vice President and Director of East County Lawyer Referral Service

PERSONAL
Age: 54   Health: Excellent

REFERENCES
Available upon request
Résumé

HONORABLE EDDIE C. STURGEON

Judge, San Diego Superior Court, East County Judicial District, 1998 to present
Judge, Municipal Court, El Cajon Judicial District, 1988-1998
Presiding Judge, Municipal Court, El Cajon Judicial District, 1990
University of Santa Clara School of Law, J.D., 1973
Private Practice, 1974-1988
Professor, California School of International Management
Professor, Cuyamaca Community College
Professor, National University
Planning Committee Chairperson, CJER Civil Law and Procedure Institute, 1991
Faculty, CJER Civil Law and Procedure Institute, 1988, 1991 and 1992
Planning Committee Municipal and Justice Courts Winter Institute, 1990
Board of Directors, San Diego County Judges Association, 1988, 1989 and 1990
Faculty, California Judicial College, 1991, 1993-2006
Faculty Seminar Leader, California Judicial College, 1991
Planning Committee, California Judges Annual Meeting, 1993
Faculty, California Judges Annual Meeting, 2006
Faculty, California Judges Annual Meeting, 1993
Faculty, Municipal and Justice Courts Institute, 1992 and 1993
Faculty, Criminal Law and Procedure Institute, 1994-2002, 2005 and 2006
Faculty, Orientation for New Trial Judges, 1995
Executive Board Member, California Judges Association, 1994, 1995, and 1996
Chair, Sentencing Curriculum Development Committee, 1996
Faculty, Retired Judges Institute, 1996 and 1997
Member, CJSP-Post-NJE Curriculum Planning Committee, 1994
Faculty, Institute for New Assignments, 1998

11-20-07
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, D.C. 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including the WASC Senior College and University Commission and the North Central Association of Colleges and Schools. ACICS criteria are clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

It is regrettable that the quality of education offered by CIBU is undermined by the loss of ACICS recognition as an accrediting body of CIBU.

Sincerely,

Dariush Ershadi, Ph.D. (can.)
Faculty Member at University of California, San Diego (UCSD)
Faculty Member at California International Business University (CIBU)
Dan Ershadi

2219 Sawgrass Glen • Escondido, California 92026 • (619) 222-9898 (Cell)

EDUCATION:

Ph.D. (Can.) - Management and Organizational Development
United States International University - San Diego, California

M.B.A. - Masters of Business Administration
C. Oklahoma State University - Edmond, Oklahoma (1977)

B.S. - Bachelor of Science - Economics
College of Economics and Social Sciences (1974)

SPECIAL TRAINING:

- The New Supervisors Enrichment Program
- Training, Orientation and Leadership
- Project Management
- Just-in-Time
- ISO 9000
- Appreciative Inquiry
- Continuous Improvement
- Statistical Process Control
- Situational Leadership
- Supply Chain Strategies
- TQM
- Six Sigma Process

TEACHING EXPERIENCE:

Adjunct Faculty of Business and Finance
University of California – San Diego, California (2013 – Present)


Adjunct Faculty of Business Management
California International Business University – San Diego, California (2014 – Present)

Teaching courses in Organizational Development and Culture (CIBU 610), Operations Management (CIBU 630), Entrepreneurial Finance (CIBU 496), Corporate Finance (CIBU 627), Financial Management (CIBU 360), Organizational Behavior and Business Management (CIBU 435), World Economic History (CIBU 325)
Lead Faculty for Finance and Economics  
University of Phoenix – San Diego, California (2010 – Present)


Economic Analysis, Managerial Economics, International Economics, Macroeconomics, Microeconomics, Money and Banking

Area Chair of Economics  
University of Phoenix - Sacramento, California (1997 - 2010)


WORK EXPERIENCE:

Director of Finance and Project Developments  
EDI Contracting, Inc. - Murrieta, California (2006 - Present)

I am currently in charge of business development and financial planning for EDI Contracting, Inc. As the director of finance and operations, my prime responsibilities
include strategic formulation and implementation of new ventures, creating strategic alliances with the stakeholders, financial analysis for major commercial construction projects, marketing research for commercial building and property developments. I oversee the critical path analysis and overall management of all the projects. I also conduct vendor negotiations as well as supply chain solutions for the company. Some of my responsibilities are to oversee the daily operations of the company which include and not limited to the Just-in-Time, Materials handling, Inventory, and Process and Quality Control management of the company.

I am also member of the Board of Directors of the company.

**Director of Academic Affairs**  
**University of Phoenix - Sacramento, California**  
*(2005 - 2006)*

I served in the capacity of Director of Academic Affairs for Sacramento Campus. In this capacity, I planned, directed, and monitored activities such as curriculum development, institutional research, delivery modalities and new product development in conjunction with organizational goals and objectives. I oversaw all aspects of 555 faculty members’ management and supervision of 32 staff, which included recruitment, development, and performance standards.

**Chairman of Project Management Advisory Board**  
**Folsom Lake College – Folsom, California**  
*(2004 – Present)*

As the Chairman of Project Management Advisory Board, I hold and direct all the project advisory meetings for the Folsom Lake Community College. Within this capacity, I engage the business leaders of the community to provide insights in new emerging professions and industry needs. I oversee and approve all the projects including integration of the community projects to the curriculum development of the college. Upon the success of the projects, I make the recommendations for the curriculum development.

I was also a Project Management faculty member of the Folsom Lake College.

**Regional Operations Manager**  
**Roadway Express, Inc. - Sacramento, California**  
*(1985 - 2005)*

Maintained a teamwork environment and create new worktechniques to motivate 375 dock staff, pickup/delivery drivers to increase work performance. I improved operating efficiency of each driver by conducting rerouting studies. I participated in the implementation of Just-in-Time, TQM, Six Sigma and SPC processes to improve the operational efficiency. I participated in planning of company's supply chain strategies in Northern California region.
For the last six years of my career with the company, I was the New Supervisors Training Program (NSTP) Director where I recruited, interviewed, trained and mentored the new supervisors and managers.

OTHER CREDENTIALS, RECOGNITIONS AND ACHIEVEMENTS:

Holder of the California Community Colleges Credential in the Industrial management subject since 1981, valid for lifetime
Recipient of Silver Bullet Award for exemplary employee in 1991 at Roadway Express, Inc
Recipient of the Management Excellence Award in operational effectiveness in 1995 at Roadway Express, Inc
Recipient of the Stellar Faculty of the Year Award in 2004 at the University of Phoenix
Certified Advanced Faculty recognition in 2012 at the University of Phoenix
Recipient of Faculty Scholar Award in 2014 at the University of Phoenix
Chairman of Project Management Advisory Board of Folsom Lake Community College since 2008
Member of Sacramento Chamber of Commerce Economic Advisory Board since 2007
Member of the Osher Life Long Learning Institute of the University of California since 2014
Frequent lecturer in American Economy at the University of California, San Diego

REFERENCES:

Available upon the request
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by recognized accrediting agencies including the Distance Education Accrediting Commission (DEAC) and the Western Association of Schools and Colleges (WASC). ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Dr. Georg Schlueter, PhD, MSc, MBA
Faculty Member at California International Business University

CALIFORNIA INTERNATIONAL BUSINESS UNIVERSITY
550 West B Street San Diego, California 92101 Tel: (619) 702-9400 Fax: (619) 702-9476

www.cibu.edu
Dr. Georg Schlueter, a technologist and entrepreneur, is a leading international executive who applies his management and business development expertise to technology-based corporate growth opportunities. He works with internationally oriented higher education institutions in Southern California who enjoy accreditations by the Accrediting Council of Independent Colleges and Schools (ACICS), the Distance Education Accrediting Commission (DEAC) and the Western Association of Schools and Colleges (WASC).

In his teaching engagements of the past 25 years, Dr. Schlueter is fully aware of the industry’s critique of the all-too-common “Knowing-Doing Gap” and focuses on practical applications while expanding his students’ knowledge base.

He served at CIBU as interim Academic Dean during the 2016/17 time period. Under the supportive guidance provided by ACICS' rigorous quality standards, Dr. Schlueter successfully implemented in CIBU’s business management courses Critical Thinking (CT) techniques, New Product Development (NPD) processes as advocated by the American Product Development & Management Association (PDMA), Design Thinking (DT) as developed by Stanford University’s pioneering Design Thinking Institute, and innovative problem-solving techniques suitable for accelerating Innovation.
Mr. Herman Bounds, Jr., Director – Accreditation Group  
U.S. Department of Education, Office of Postsecondary Education  
LBJ Building, 400 Maryland Avenue, S.W., Washington, DC 20202

Re: Letter of Support from Institutional Administrator/Educator

Dear Mr. Bounds,

I serve as the Dean of Academic Affairs and as Associate Professor of Finance in the American B.Sc. Program in Business Administration at Niels Brock Copenhagen Business College, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My CV is attached for your reference.

With this letter, I would like to express my observation, as both an administrator and as an educator, that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with standards required of other national and regional accrediting agencies. This information is based on my experience as a faculty member in other institutions of higher education accredited by other recognized accrediting agencies, namely the:

- Southern Association of Colleges and Schools (University of Memphis, Christian Brothers University, LeMoyne-Owen College), and
- North Central Association of Colleges and Schools (University of Michigan, Jones International University), plus work with programs at other institutions represented by, inter alia, the above accreditors and the
- Western Association of Schools and Colleges (e.g., the University of Hawai‘i).

ACICS criteria are clearly stated, which enables us to craft policies that assure a quality education for our students. If any changes are made to the criteria, it has been my experience that ACICS informs the institutions, providing details and rationale for the changes. Their workshops have been especially helpful in this regard.

I strongly support the efforts that the Agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by academics such as myself, who work at ACICS accredited institutions. Please consider this letter an expression of my unconditional support for the Agency.

Collegially,  
Sharon B. Pedersen, Ph.D.  
Dean of Academic Affairs and Associate Professor of Finance  
Niels Brock Copenhagen Business College  
American B.Sc. Program in Business Administration  
Email: [redacted]
Vision

To transform individual lives through international educational opportunities.
To foster understanding and develop connections between local and global communities.

CV Content Links

Hold Ctrl and then Left Click to access each section below.

I. Academic Program Development, Administration, Teaching, and Course Development

II. Online Course Development, Teaching, Project Advising, Marketing, Faculty Mentoring

III. Scholarly and Professional Research and Dissemination

IV. Educational Credentials and Proficiencies

V. Industry Experience in Economic Analysis, Banking and Finance

VI. Academic and Professional Memberships

I. Academic Program Development, Administration, Teaching, and Course Development

Niels Brock American B.Sc. Program in Business Administration, Copenhagen (2015-date)

- Dean of Academic Affairs—Program development; compliance and administration; faculty and staff hiring, management, professional development, and performance evaluation
- Co-Coordinator of the Program’s “Campus of the World"
- GENIE Center Director (GENIE = Global Education, Innovation, and Entrepreneurship)
- Site Administrator—Moodle Learning Management System for hybrid format of all courses
- Associate Professor of Finance
- Curriculum development:
  - Finance Concentration
    - Digital Innovation Concentration (projected start: Fall 2018)
  - Courses developed:
    - Financial Modeling (using MS Excel)
    - Financial Econometric Modeling (using R, SAS)
    - Venture Capital and Private Equity
    - Entrepreneurial Finance
    - Global Finance
    - Personal Finance
• Currently teaching: Financial Modeling (using Excel; in Vietnam);
  Additional substitute teaching in Finance and Accounting;
  Statistical programming laboratories for specific courses:
    Information Technology;
    Introduction to Statistics; and
    Business Statistics

  ▪ MSc Programme in International Business and Management, courses taught:
    International Finance
    Corporate Finance (“Strategic and Financial Decision Making”)
    Research Methods
    Masters of Science Dissertation Advising
  ▪ Graduate Certificate Programme in International Business (Pre-Masters Programme):
    Introduction to International Accounting
  ▪ BA (Honours) Programme, Finance Stream, courses taught:
    Turbo Introduction to Business Finance
    Business Finance
    Forensic Accounting
    Accounting and Finance Research Project
  ▪ Co-coordinator with UK faculty member, Solicitor Oliver Charles
    Annual Forensic Art Seminar (orig. “Art Fraud Seminar”)

LeMoyne-Owen College, Memphis, Tennessee USA
  ▪ Assistant Professor in the Division of Business and Economic Development 1996-2003
  ▪ Courses taught: Business Statistics I Business Statistics II
    Macroeconomic Principles Microeconomic Principles
    International Trade and Finance
    Global Economy and International Business
  ▪ Courses developed and taught: The Japanese Economy
    Japanese Language and Culture I and II
  ▪ Active use of Blackboard Academic Suite™ learning management system for online delivery of
    course materials, supplementary instruction, supplementary evaluation, and communication with
    students.
  ▪ Faculty Advisor for FLAG, the International Studies Association

University of Memphis, Memphis, Tennessee USA
  ▪ MBA Economics Tutor in the Executive MBA Program
  ▪ Certified Employee Benefits Specialist Trainer in Health Economics, 1998-2000
  ▪ Courses taught: Macroeconomic Principles Microeconomic Principles
    Managerial Economics Financial Markets
    International Finance
University of Michigan, Ann Arbor, Michigan USA
- School of Public Health, Health Economics Tutor, 1994-1995
- Ross School of Business, Ann Arbor, Michigan, Spring 1995
  Course taught: The World Economy

Christian Brothers University School of Business, Memphis, Tennessee USA
- Course developed and taught: Japanese Language and Culture, 1990-91
- Courses taught: Business Statistics I and II, 1991-93

II. Online (Exclusively) Course Development, Teaching, Advising, Marketing, and Faculty Mentoring

Jones International University (JIU), Online
Faculty in the DBA, MBA, and BBA Programs, 2003-2012
- Course Developer and Content Expert for Graduate and Undergraduate Courses:
  Introductory Economic Theory  Managerial Accounting
  Economic Theory and Applications  Corporate Finance
  Emerging Markets and Global Strategies
  Managing Organizations for Profitability
  Financial Management of the Multinational Corporation

- Courses Taught:
  **Graduate Level:**
  Economic Theory and Applications  Global Strategy
  Cross-Cultural Management  Multinational Finance
  Managing Knowledge Workers  Managerial Accounting
  Transnational Marketing
  Emerging Technologies in Global Markets
  Organizational Measurements and Assessments (DBA)
  **Undergraduate Level:**
  Introductory Economic Theory  Managerial Finance
  Fundamentals of Business Writing  Corporate Finance
  Managing Organizations for Profitability

- United Nations Development Program’s Virtual Development Academy Instructor for over 70 of the United Nation’s “Resident Representatives” across 5 continents (External/Contract Instruction for JIU)
- JIU Marketing Division: Researched and wrote career-related promotional literature for JIU:
  “Why Choose a Specialty in Global Enterprise Management?”
  “Why Choose a Specialty in Finance?”
- JIU Marketing Division: Taught one-week online course, “Virtual MBA” course as part of *The Jones International University Virtual MBA* (Mathis & Keat, 2003) text and course promotion.
University of Maryland University College (UMUC)
Faculty Member and Faculty Mentor in the Regular MBA and Dual-Degree MBA Programs, 2006-2009
- **Course Taught:** Organizations in the External Environment/Managing Global Business
  Instructed students and evaluated team projects encompassing
  Multinational company selection  Global operations
  Business and environmental analysis  Trade and trade financing
  Supply chain management  Human resources deployment
  Financial statement analysis
- **Student Advising:** Sponsored team presentation to executive staff of Sirius Satellite Radio, New York—Spring 2007
- **Faculty mentor to new staff; conducted faculty performance evaluations**
- **UMUC Course Development and Curriculum Re-design:** Developed study modules for the international monetary and finance units of all 15-plus sections of this course, as part of curriculum re-design from a 13-week to 10-week format.

Davenport University Online (DUO) 2005-2007
Faculty in the Undergraduate and Graduate Business Administration Programs
- **Courses Taught:**
  **Graduate Level:**
  Quantitative Analysis  Managerial Economics
  **Undergraduate Level:**
  Introduction to Statistics  Quantitative Methods
  Macroeconomics  International Business
- **Active use of Blackboard Academic Suite™ for online discussion, evaluation, delivery of course materials, supplementary instruction, and communication with students.**
- **Provided modeling instruction in**
  Probability and Statistics  Decision Analysis
  Linear and Goal Programming  Forecasting
  Network and Path Analysis  Project Management
  Inventory and Waiting-Line Models  Simulation
  Transportation and Assignment Problems
- **Software Packages Used:** Management Scientist®, TreePlan™, Crystal Ball Pro™, Microsoft Excel®, Excel Solver™, Minitab®, SAS®, R Project for Statistical Computing
III. Scholarly and Professional Research and Dissemination

**Teaching for Active Learning, Southern Denmark University,** November 2017, Odense
Participated in master class on blended learning, along with seminars on managing institutional change and teaching for a digital age.

**Council of Colleges of Arts and Sciences Seminar for New Deans,** July 2017, Nashville
Attended seminars on the shaping and organizing of college operations, myriad faculty issues, equity and Inclusion in decision making, and stakeholder expectations.

**Teaching for Excellence Workshop,** January 2017, San Diego, CA
Developed and delivered workshops to the California International Business University faculty in preparation for accreditation, which was awarded in April 2017.

**Teaching for Active Learning, Southern Denmark University,** November 2016, Odense
Seminars on student orientation, the first-year experience and helping students to manage transitions.

**Joint Statistical Meetings/American Statistical Association,** August 2016, Chicago
Business and Economic Statistics Section Presentation—“Cluster Analysis of Financial Institution Fraud: The Role of Civil Money Penalties”

**International Studies Association,** March 2016, Atlanta
Presentation—Corruption Analysis: A Critical Methodological Review

**Accrediting Council of Independent Colleges and Schools (ACICS) Renewal Workshop,**
March 2016, Washington, DC: Participant

**De Montfort University/American BSc Program Forensic Art Seminar Co-Coordinator**
February 2015 to date

**De Montfort University/Niels Brock Art Fraud Seminar,** February 2015, Copenhagen,

**International Small Business and Entrepreneurship Conference,** November 2013, Cardiff, Wales, UK
Presentation: “Cooperatives v. Non-Cooperatives: Organizational Structure and Social Enterprise with Implications for Food Distribution in Denmark”

**Cambridge International Conference on Open and Distance Learning** September 2009. Paper accepted for presentation at Cambridge University’s St. Edmond’s College.
Title: “Use of Digital Technologies for (MBA-Level) Competency Building.”

**International Health Economics Association,** Conference presentation accepted for July 2005 Fifth World Congress, “Investing in Health”, in Barcelona, Spain. Title of Presentation: The Determinants of Demand for Complementary and Alternative Medicine
Active Learning in Economics, Workshop sponsored by the National Council of Economic Education, the University of Memphis and the Memphis Branch of the Federal Reserve Bank of St. Louis, in Memphis, Tennessee November 2002. Co-Presenter, E-Poster Session: Teaching Macroeconomics and Managerial Economics.


Infusing African and Asian Studies into the Undergraduate Curriculum, Conference Lead Coordinator for this national faculty development conference.
Sponsored by The East-West Center of The University of Hawai’i and LeMoyne-Owen College with a grant from the National Endowment for the Humanities, in Olive Branch, Mississippi, March/April 2000.

International Peace Studies and Conflict Resolution, Conference
Lead Coordinator for this national faculty development conference sponsored by the Phelps-Stokes Fund of New York and Lemoyne-Owen College, in Memphis, Tennessee, November 1999. Also presented paper: “Internationalizing the Undergraduate Curriculum”.

Infusing Asian Studies into the Undergraduate Curriculum
East-West Center, University of Hawai’i
Three-week seminar on Asian Studies content and on re-structuring of existing course syllabi to incorporate Asian Studies. Sponsored by the East-West Center of the University of Hawai’i in Honolulu, July-August 1997

Invited Seminar Presentation: Contributions from Law and Economics

Statistics and Statistical Research Methods: Data Quality

Statistical Programming and Statistical Software Use

Statistical and Financial (Insurance) Analysis
data, and insurance status from the U.S. Bureau of the Census and from the results of an original survey.

1998-1999

**Fulbright Seminar Participant in Israel and Egypt**
**United States Department of State, Washington, D.C.**
Fulbright Program, U.S. Department of State, in various cities in Egypt and Israel, Summer 1999.
Presented curriculum unit entitled “Economic Aspects of Nation-Building in Egypt and Israel: An Examination of the Structure of Trade between Two Countries and with the Rest of the World.”

**Economic Impact Analysis**
**Bureau of Business and Economic Research, Aviation Research/Economic Consultancy**
Affiliation: The University of Memphis
Researcher: Wrote an economic impact analysis of a planned expansion of Memphis International Airport operations on local and international tourism, in Memphis, May-October 1998.

**Foreign Research Fellow**
**Japanese Ministry of International Trade and Industry (MITI) Tokyo, Japan**
(Subsequently renamed Ministry of Economy, Trade and Industry” (METI))
Small and Medium Enterprise Agency
Researched the international activities, financial and labor market conditions of Japan’s small- and medium-sized corporations. Tokyo, June-July 1994.

**International Economics and Finance Publications**
““The Asian Financial Crisis—Regional Capitulation or Re-Direction?””

**Text Proposal Reviews**
- *Corporate Finance for Business*, MBA-level text and supplements
  - Tarbert and Russell
  - Oxford University Press, United Kingdom March 2007
- *Microeconomics In Context*, Principles-Level Text
  - Global Development and Environment Initiative
  - Neva Goodwin, Co-Director and Co-Author
  - Tufts University, Fall 2000-Spring 2001
- *Managerial Economics: Applications, Strategy, and Tactics*
  - By McGuigan, Moyer, and Harris
  - South-Western Thomson Learning, October 2000
- Web-Based Software Review: *ALEKS for Business Statistics*
  McGraw-Hill Irwin, May 2002

**Educational Software Development**
Used Aplia™ software (“Technology to Support the Economics Classroom”, www.aplia.com) to conduct online economics simulations. Developed and critically reviewed instructional problem sets in Economics for Aplia™, Inc. 2002-2003

- Text Supplements/Problem Set Development in:
  - “International Economics”
  - “International Trade & Public Policy”

- Text Supplements/Problem Set Critiques in:
  - “Oligopoly and Monopolistic Competition I”
  - “Oligopoly and Monopolistic Competition II”
IV. Educational Credentials and Competencies

Ph.D. in Business Administration, Economics Emphasis
University of Memphis, Memphis, Tennessee USA May 2006
Dissertation Title: Determinants of the Demand for Complementary and Alternative
Medicine (CAM): A Double Hurdle Model of Participation and Utilization
(An econometric analysis of CAM demand)
National Health Interview Survey, 2000-2002 Data Analysis Expertise
Medical Expenditure Panel Survey, 1996-2002 Data Analysis Expertise

M.A. in Economics
University of Michigan, Ann Arbor, Michigan 1995

M.A. in International Studies
Johns Hopkins University, Washington, DC 1985
Paul Nitze School of Advanced International Studies
Main subjects: International Economics, International Finance
Required Foreign Language Proficiency in Japanese

Pre-Graduate Studies
- United Nations Graduate Study Programme, Geneva, Switzerland Summer 1983
- Sophia University, Summer Session in Asian Studies, Tokyo, Japan, 1981
- Occidental College, A.B., Artis Baccalauris, Degree, Los Angeles, CA 1976-80
  Occidental College Study Abroad:
  Waseda University, International Division Tokyo, Japan 1978-79

Proficiency in Software Use
- Learning Management Systems: Moodle; Blackboard Academic Suite™
- Operations Management Software: Management Scientist™
- Statistical Programming: R (R GUI and R Studio); SAS System®
- Spreadsheet Modeling: Microsoft Excel® and Excel Add-Ins; Google Sheets
- Database Management: Microsoft Access®
- Computational Modeling: ARENA™ Simulation Software
- Qualitative and Mixed Methods: NVivo®; Dedoose®
- Data Analytics and Reporting: Knime® (Konstanz Information Miner)
- Document Processing: Microsoft Word and Microsoft PowerPoint

Language Proficiency
- Native speaker of American English
- Spanish—First foreign language; 2 years of study; no immersion; limited speaking ability
- French—Intermediate level reading, writing, and speaking skills; short-term immersion.
- Danish—Advanced reading and translation skills in business and academia; moderate speaking and writing proficiency; long-term immersion
- Japanese—Advanced reading and translation skills in business and academia; moderate speaking and writing proficiency; long-term immersion
- German—Advanced reading and translation skills in business and academia; moderate speaking and writing proficiency; intensive medium-term immersion
V. Industry Experience in Economic Analysis, Banking and Finance

**Health Economic Modeling and Outcomes Research**
As Senior Economist on sabbatical at CRC, Inc. in Cardiff, Wales, conducted:
- Monte Carlo simulation, Markov models,
- Cost-effectiveness and cost-utility analytical techniques,
- MS Excel™ spreadsheet modelling,
- Mathematical and financial modelling using SAS® and R,
- Simulation modelling using Arena™
- Sensitivity analysis, and
- Financial analysis

for both pharmaceuticals and medical device manufacturers. Quantitative and qualitative (e.g., literature reviews) in health economic analysis for submissions to health regulatory bodies.

**Business Development:**
- Conducted market access research for clients;
- Generated new leads and cultivating existing relationships with clients.
- Secured a £100,000 contract from a major US pharmaceutical company for a lipids research study.
- Engaged in alpha and beta testing of CRM (Client Relationship Management) system software.

**Internal Training:** Led database awareness initiative (“C++ Luncheon Series”) for company research into the availability and quality of random control trial data, secondary care data, mortality data, 2008.

**Investor Relations Specialist, IR Japan** Tokyo, Japan
- Consulted Japanese institutions on how to raise finance in U.S. and global financial markets.
- Acted as lead consultant on
  - The Nippon Telephone & Telegraph privatization
  - Takeda Pharmaceuticals
  - Sumitomo Trust and Banking
  - Mitsubishi Petrochemicals
  - Snow Brand Milk Products Company
- Assisted Japanese firms in preparing and conducting their presentations to investors.
- Researched and wrote financial marketing materials based on the proposed IR concept and based on primary and secondary research on Japanese corporations.
- Translated financial statements and other business documents from Japanese to English.
- Provided in-house training to staff members on how to compute, read, and interpret accounting data and financial ratios.
- Coordinated an international team of consultants and support staff in development of corporations’ investor relations programs. 1989-90

**Banking Officer and Credit Analyst, J.P. Morgan Chase**
New York, New York and Tokyo, Japan
(Formerly Chemical Banking Corporation, Global Securities and Foreign Exchange Division
(before merger with Chase Manhattan Bank))
- Analyzed financial statements, business operations, and business conditions of domestic and multinational for-profit and non-profit organizations.
- Determined conditions for lending funds to organizations
- Conducted budget/cash flow analysis; completed accounting and reporting for compliance with Federal Reserve regulations
- Made lending recommendations to Senior Loan Committee
- Marketed the bank’s ancillary financial products
- Established and maintained the bank’s relationships with institutional clients

In Tokyo,
- Supervised Japanese analysts
- Analyzed financial statements (Yuuka Shoken Hoooku-Sho), business operations, and business conditions of Japanese and other Asian organizations
- Determined conditions for lending funds to Japanese and other Asian entities
- Made lending recommendations to Senior Loan Committee in the United States from Japan.
- Marketed the bank’s ancillary financial products
- Established and maintained the bank’s relationships with multinational client base in Japan. 1987-89

**Robert Bosch Fellow**
**Deutsche Bundesbank, Frankfurt am Main, Germany**
- Researched and compiled central bank meeting notes and German economic indicators
- Translated relevant finance and economics documents from German to English.
- Examined German reparations policy.
- Researched monetary policy implementation across several divisions of the Bank. 1985

**Dresdner Bank, Frankfurt am Main, Germany**
- Analyzed foreign bank financial statements and reported to bank credit committee representatives.
- Assisted U.S. Desk Officer in preparing credit reviews and economic analyses.
- Translated relevant finance and economics documents from German to English. 1986

**International Trade Administration, Analyst**
**United States Department of Commerce, International Trade Administration, Washington, D.C.**
- **Office of Trade and Investment Analysis**: Collected and analyzed trade and investment data

**Country Risk Analyst**
**Regions Bank, Memphis, Tennessee USA (Formerly Union Planters National Bank)**
- Analyzed foreign government and private sector credits for bank’s participation in international loan syndications
- Assessed data quality and prepared statistical analyses of macroeconomic data
- Consulted country desk officers in the U.S. Departments of Treasury, Commerce and State; World Bank and International Monetary Fund and private international banks on country credits and loan syndications
- Interviewed the bank’s network of international CFOs and other corporate managers for assessment of local economic and financial conditions
Foreign Exchange Specialist  
Regions Bank, Memphis, Tennessee USA  
(Formerly Union Planters National Bank, International Division)  
- Balanced the bank’s foreign currency accounts.  
- Maintained the bank’s correspondent banking network; assessed creditworthiness of correspondent banks  
- Set exchange rates based on interbank consultations with money center banks in New York, San Francisco/Los Angeles, Chicago, and St. Louis  
- Traded foreign currencies on behalf of bank’s wholesale and retail clientele. 1982-1983

Editor, Translator and Writer  
Trade Times, Tokyo, Japan  
- Edited the English edition of Trade Times, a monthly publication of the Japan Machinery Exporters’ Association.  
- Translated news articles from Japanese to English.  
- Wrote advertisement copy for the newspaper and speeches for Association executives 1981-82

Contributing Editor  
Office English, Tokyo, Japan  
- Wrote monthly articles on international trade operations for Japanese career professionals. 1981-1982

VI. Academic and Professional Memberships

Board of Directors, Ekofolio Investment Fund  
American Economics Association  
American Finance Association  
American Statistics Association  
R Meetup, Copenhagen  
Diamantklub, Danish Royal Library Membership  

Danish American Business Forum  
Danish Chinese Business Forum  
Danish Lawyers’ and Economists’ Association  
Robert Bosch Alumni Association  
British Chamber of Commerce in Denmark

Official transcripts and references are available upon request.
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as a full-time faculty member at Niels Brock Copenhagen Business College, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools and Middle States Association of Colleges and Schools. ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at Niels Brock, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

(b)(6)

Thomas D. Eatmon Jr., PhD
Faculty Member at Niels Brock Copenhagen Business College
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including the WASC Senior College and University Commission. ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Peter McLaughlin, J.D.
Faculty Member at California International Business University
Senior Technology Executive with over 20 years experience in the technology sector and 10 years in the teaching sector. Technological Co-Founder of Pyxis Corporation which was acquired by Cardinal Health then Becton Dickinson. Experience includes Wireless Telecommunication, Alternative Energy, Mems/Nanotechnology, Medical Devices and RF Technology. International Certification in Mediation.

ACADEMIC CREDENTIALS

CALIFORNIA INTERNATIONAL BUSINESS UNIVERSITY
550 West B Street, San Diego, CA
Currently
Courses taught:
629: Marketing
786: Strategic Global Marketing

SAN DIEGO UNIVERSITY FOR INTEGRATIVE STUDIES
3900 Harney Street, San Diego, CA
Currently
Courses taught:
BUS 466: Legal and Ethical Issues in the Global Marketplace
BUS 725 Sales
MKT 636: Ethics & Standards in Marketing

CALIFORNIA STATE UNIVERSITY SAN MARCOS
San Marcos, CA.
Currently
Business Professional Development-Executive in Residence Program, Professional mentor to 35 students in the Undergraduate School of Business.

Dean's Advisory Board-Undergraduate and Graduate Schools of Business.
Guest speaker in CSUSM's "In the Executive's Chair" (ITEC) class

Essential of Business Law, Introduction to the legal environment of American business including history; legal systems; social, ethical and political forces effecting the development and operation of the legal system.

The Legal and E-Commerce Environment Today, Taught course that focuses on the legal system as it affects the business environment, on sources of law, and on law's impact on social, business and ethical issues. Emphasis is on law as it pertains to business torts, personal torts, crimes, contracts, business regulation, agency and employment, international business, and protection of intellectual property.

PROFESSIONAL EXPERIENCE

Principal - McLaughlin Enterprises - San Diego, CA October 2009 - Present
Consulting firm specializing in Operations, Contracts, Online and Social Marketing, Optimization, Strategic Planning, Procurement, Revenue and Profit Growth, Team Building and Change Leadership, Crisis Management and Capital Raising.
- Created Executive Marketing Services, www.executivemarketingservicesllc.com/
- Created CL AD Blaster: www.cladblaster.com
- Currently have over 1500 clients in all 50 states.

Assenti provides fabrication and design services for numerous MEMS, microelectronic, electro-optic and nanotechnology applications. Assenti creates new therapeutic management techniques enabled by biosensors.
Assenti is currently developing an intraocular pressure (IOP) monitoring system, small enough to be implanted into the eye. The information provided by this system improves glaucoma therapy and prevents blindness. The IOP monitoring system incorporates an RFID-based power and telemetry system and a MEMS-based proprietary sensor. The system allows for quick and accurate monitoring by the patient, without an office visit. The system is implanted through a routine, 15-minute procedure.

- Created RFID-based IOP monitoring system. MEMS-based proprietary sensor.
- Responsible for all capital raising and strategic partnerships
- Negotiated $2M development deal with Hanita Lenses
- Negotiated two strategic partnerships with Fortune Five Hundred Companies.
- Merged CallMate™ product line into Assenti.


Recruited by security products manufacturer to help create proprietary, biometric security door. ProSteel is a strategic partner exclusive manufacturer for Browning Corporation.

- Introduced new line of biometric security doors at the International Builder’s Show in Florida.
- Launched very successful safe specialty outlet program in conjunction with Browning Corporation and doubled previous year’s safe outlet sales.
- Personally handled all design work, pre-market offerings, marketing, and new and existing sales.
- Produced two full length video commercials for the company.


Global Wireless Group offered complete turnkey management and construction services for PCS next generation cellular, Enhanced Specialized Mobile Radio, infrastructure and relocation microwave and similar telecommunications networks.

Retained as Crisis/Turnaround President and CEO
- Performed complete turnaround that prevented company from filing bankruptcy.

**SELECTED ACHIEVEMENT HIGHLIGHTS**

1. Technological co-founder of Pyxis Corporation (www.pyxis.com). Pyxis went public in 1992 and sold to Cardinal Health in 1996 for $1Billion. In September of 2010, Cardinal spun off Pyxis and its other technology companies under the name of CareFusion (NYSE:CFN) CareFusion was purchased by Becton Dickinson in 2015 for $12.5 billion.
2. Technological co-founder of McLaughlin Electronics. Created the wireless tire pressure monitoring technology that is used by most of the automobile manufacturers in the world. In July of 2009, sold the patent rights to Nissan.
3. Identified and secured a strategic relationship with Arcadis Corp. (NASDAQ:ARCAF). As a result of this international partnership I was able to negotiate long term full turnkey project valued at $52 million with Nextel, Verizon and Sprint.
4. Attended and participated in the first ever joint Mediation Seminar between China and an American University, Pepperdine University. Certified in International Mediation.

**EDUCATION**

- BA - Seattle University, Seattle, WA
- MBA - Pepperdine University, Malibu, CA
- JD - Western State University

**CERTIFICATIONS**

- Mediation
  - Straus Institute for Dispute Resolution
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including the Western Association of Schools and Colleges (WASC) Senior College and University Commission (WSCUC). UC San Diego Extension – where I was a director – is accredited by WSCUC through the university. ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Susan J. Haugh, M.Ed., SPHR, BCC
Faculty Member at California International Business University
SUSAN J. HAUGH, M.Ed., SPHR, BCC

Summary: Over twenty-five years of business experience gaining knowledge in higher education, hospitality, non-profit, and career outplacement services. Proficient in Spanish; skilled in strategic planning, project coordination, and development of people and ideas.

- Interpersonal skills & acumen that demonstrate the ability to coach, connect, & build relationships with all levels of the organization, including diverse cultures, generations, and faculty.
- Successful track record of recruiting and developing top performing international students, instructors, & employees.
- Accomplished communicator, experience includes the design & presentation of business curriculum, student orientation, career management, and workshops incorporating acculturation, team-building, problem solving, and conflict management strategies.
- Analytical and writing skills to create effective resumes, job descriptions, marketing materials, student & employee handbooks, investigative reports, and international correspondence.
- Teach classes in: Human Resources, Leadership and Management, U.S. Business, Career Strategies, Organizational Behavior, American Business History. Classes taught at certificate, undergrad, and graduate level to students from all over the world.
- Visiting Faculty, completing two successful business teaching assignments at University of Wenzhou, China, 2016

EMPLOYMENT HISTORY

2011- Present CALIFORNIA INTERNATIONAL BUSINESS UNIVERSITY www.cibu.edu San Diego, CA
Director, Student Affairs and College of Life-Long Learning, Adjunct Faculty
Director of Admissions and Registrar, Director of Global Partnerships and Initiatives

Cross-functional member of Senior Leadership Team based on experience in higher education, human resources, and administration

- Design and develop short-term study programs involving specialized curriculum & experiential learning for diverse audience.
- Member of Curriculum Committee, collaborate with team to ensure logical course sequence, proper pre-requisites, comprehensive business curriculum, cutting-edge topics, and inclusion of different backgrounds and education.
- Serve as internal Human Resource consultant, advising on best practices, labor law, and other compliance-related issues.
- Develop partnerships with overseas universities, agents, and resources such as EducationUSA for student recruitment.
- Recruit and interview faculty, assist in development strategies applying educational technology and webinar background.
- Teach classes on a quarterly basis for students with varying levels of English, education, and cultural intelligence.

2006-2011 UC SAN DIEGO (Extension) www.extension.ucsd.edu/international San Diego, CA
Director, Business Programs for International Students

Overall responsibility for IM annual study abroad program, involving interaction with a variety of cultures and backgrounds.

- Responding to both market demand and cultural issues, expanded lower level program from 3 months to 9 months, resulting in increased revenue & quality of education, higher student engagement, and maximum enrollments each quarter.
- Worked closely with faculty to oversee appropriate syllabus content, including assessments, methodologies, and class structure.
- Consistently identified and admitted appropriate students for programs, working closely with educational agents & admissions.
- Served as advisor and mentor for students, offering guidance regarding academics, internships, and behavioral choices.
- Met with visiting agents; attended career fairs, presented info sessions, and visited internship sponsors to ensure high quality.
- Reduced expenses & risk associated with program through creative and innovative problem-solving.
- Taught “Career Prep” course, geared for students looking for internship opportunities.

2002-2006 CENTER GROUP CONSULTING www.centergrouplexconsulting.com San Diego, CA
Consultant (Work overlapped with Lee Hecht Harrison)

Provide a variety of human resource and organizational development services to individual clients on an on-going basis

- Partnered with management to identify problem areas, and make recommendations to improve morale, retention, and performance, resulting in a 12% reduction in turnover within 6 months, and reducing recruitment costs by 5K each month.
- Revamped recruitment, selection, and retention procedures to include performing job analysis, standardizing and classifying job descriptions and establishing performance measures. Reduced recruitment cycle by average of 3 weeks.
- Conducted salary reviews, including analysis against current market value, internal equity, salary history, and job requirements.
Trained in delivery of career transition services, workshop presentation, and coaching.

- Served as Job Market Consultant for LHt’s #1 national client, developing targeted job leads in the San Diego community for over 200 associates using multiple sourcing methods.
- Built relationships with clients through engagement, orientation, and collaboration, leading to 85% placement rate.
- Consistently received seminar evaluation ratings of “excellent” from workshop clients.

2001 – 2002 THE LODGE AT TORREY PINES (Evans Hotels) www.lodgetorreypines.com San Diego, CA
Human Resources Manager

Performed all aspects of HR as they pertained to the opening, staffing, & operation of a new hotel.

- Developed, presented, and analyzed training programs, to include sexual harassment, new employee orientation, safety tailgates, customer service, and supervisor education and development.
- Instrumental in identifying, selecting, and coaching staff to achieve 5 Diamond rating from AAA within first year.
- Monitored and adjusted recruitment budget on a weekly basis, to remain consistent with department needs and strategic goals.
- Provided coaching and support to new managers and employees, facilitating positive relationships among staff totaling 300.
- Developed performance improvement programs in conjunction with management.
- Designed, implemented, and chaired successful and motivating Employee of the Month program.
- Conducted investigations in both English and Spanish, resulting in effective, long term personnel changes.

1997–2001 UNIVERSITY OF CALIFORNIA, SAN DIEGO http://blink.ucsd.edu/sponsor/hr San Diego, CA
HR Coordinator, Senior Employment Representative Campus HR, Department of Pediatrics

Served as generalist to 22 divisions, crossing all functional areas of human resources

- Conducted needs assessment, developed and presented training programs regarding HR issues and changes in policy.
- Composed and distributed electronic newsletter to inform staff of pertinent issues, fostering open communication.
- Worked with division supervisors and Principal Investigators to meet staffing needs, advising of compliance issues and making recommendations regarding classification, compensation, equity, advertisement, NEO, and other areas relating to recruitment.
- Selected and provided work direction to payroll staff in department business office.
- Conducted job analysis, wrote job descriptions, and classified positions.
- Planned and implemented recruitment strategy, including sourcing, outreach, and compliance with OFCCP, AA, and EEOC.
- Analyzed potential equity issues and authorized compensation in both represented and non-represented series.
- Advised and guided clients in following best HR practice in a variety of situations.
- Volunteered to present “Career Connection” and “How to Get Hired at UCSD” workshops.

EDUCATION, PROFESSIONAL DEVELOPMENT, AND SKILLS

- M.Ed., Educational Technology-SDSU 2011 Focused on Performance Improvement as well as Technology
- Board Certified Coach Credential, Evidence-Based Coaching-Felding Graduate University, 2011
- B.A., Spanish/Political Science – SDSU (Included year abroad in Mexico City)
- NAFSA-Association of International Educators (membership in region XII Pier), ISPI, SHRM
- California Lincoln University: Ethical Frameworks, Ethics and Globalization Spring 2015
- CSUDH: Marketing, Economics (on-line) Summer 2016
- Global webinar presentation, competitive intelligence research, LMS
- Consistent participant in a variety of workshops to include Rubric Design, Learning Trends, Assessments, Global Partnerships, Leadership, Generational Differences, and Educational Technology through CLO, GP Strategies, and EducationUSA.
December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including San Diego State University. ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

AVNEET SIDHU
Faculty Member at California International Business University

CALIFORNIA INTERNATIONAL BUSINESS UNIVERSITY

550 West B Street San Diego, California 92101 Tel: (619) 702-9400 Fax: (619) 702-9476

www.cibu.edu
Ms. Avneet Sidhu

EDUCATION
Master of Arts, Legal Psychology, Simon Fraser University, British Columbia, 2005
Bachelor of Laws, University of British Columbia, 2002
Bachelor of Arts, Psychology major, Sociology minor, University of Alberta, 1996

TEACHING EXPERIENCE
California International Business University
Adjunct Professor
San Diego, California
2016- present
Instructor for undergraduate and graduate courses in Business Law, International Business Law and Business Ethics
Thomas Jefferson School of Law
Instructor
San Diego, California
2007- 2008
Taught Legal Research and Writing to first year law students
Simon Fraser University
Teaching Assistant
Vancouver, British Columbia, Canada
September 1998- April 2002
Assisted with a number of courses, including Psychology and the Law, Social Issues in Experimental Legal Psychology, Developmental Psychopathology, and Social Psychology
Facilitated weekly tutorials with classes of 15-20 students and presented lectures on the common law legal system and on the insanity defense

PROFESSIONAL EXPERIENCE
Lounsbery Ferguson Altona & Peak
Attorney, Deputy City Attorney for the City of San Marcos
Escondido, California
2008- present
Advise private clients on real property acquisition, sale, leasing, and title review; and, obtaining approval for residential, commercial and industrial projects, including the required environmental review
In the public sector, advise on land use, election law, and policy and procedure; attend hearings as legal counsel for the Planning Commission
Responsible for supervising and training junior attorneys and paralegals
The Loftin Firm
Associate Attorney
Carlsbad, California
June 2004- 2007
Practiced civil litigation relating to residential and commercial real property matters, including contract disputes, unfair competition law and construction and title defects
Actively involved in each step of case strategy from beginning through trial to appeal
Responsible for supervising and training junior attorneys and paralegals
Legal Services Branch, Provincial Ministry of Attorney General
Articled Student
Victoria, British Columbia, Canada
September 2002- August 2003
Worked on a number of files in criminal, corporate, and administrative law, covering a range of legal issues and practice skills including, attending settlement conferences as counsel for the Ministry of Human Resources, drafting legislation, and Orders in Council
The McCrea r y Centre Society  
*Research Associate*

August 1997 – April 2002  
Vancouver, British Columbia, Canada

- Worked on a population survey of over 25,000 students in British Columbia, and samples of at-risk youth (e.g., young offenders; gay, lesbian, bisexual, and transgender youth; and, sexually exploited youth)
- Duties included questionnaire design, data collection and analysis, writing reports and grant proposals

**SERVICE AND COMMUNITY INVOLVEMENT**

Rotary Club of Carlsbad, Past President (2010), Board Member, (2008-2010).

**PUBLISHED CASES**

- *City of San Marcos v. Loma San Marcos, LLC* (2015, 4th Dist., Div. 1) – Represented Plaintiff and Respondent

**PUBLICATIONS, LECTURER AND CONFERENCE PRESENTATIONS**

**Guest Lecture Presentation:**

*Buyer Beware, Seller Beware: Of What?* Lecture delivered as part of a senior level Real Estate Transactions Finance Course at San Diego State University, September 2017.

**Publications:**


**Select Conference Presentations:**


December 15, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty member at California International Business University (CIBU), which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures, and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including the WASC Senior College and University Commission. ACICS criteria is clearly stated, which allow institutional personnel to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As an educator at CIBU, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Tim Becker, DBA
Faculty Member at California International Business University
Curriculum Vitae of
Dr. Tim A. Becker

Provides a unique blend of business-world experience with extensive academic work in the classroom, administration, academic governance, curriculum design and research. A summary of what I would bring and share at Southern Oregon University includes recognized teaching quality and expertise with constant attention to student needs and interests focusing on their success and retention. Other assets that are offered include initiative and innovation, creativity, exceptional communication skills, services development-promotions-management, listening and responsiveness, all which would be productive throughout the University, with students and community. In addition, I have practical experience in and understanding of course and program reviews and development of a full BBA program in Competency-Based Education (CBE) format.

Professional Experience in Education


Brandman University – Assistant Professor-Marketing
8/10 - Present
San Diego State University - Lecturer, 8/88 - 8/91, 8/97 - 5/03,
University of San Diego – Instructor, 9/02 – 12/11
California Intl Business University – Instructor, 1/10 – Present
California State University-Fullerton – Lecturer, 1996-1997
University of Phoenix – Instructor, 9/91 – 11/11
Webster University – Instructor, 9/04 – 5/14
Point Loma Nazarene University – Instructor, 1/95 – 5/02
University of Redlands – Instructor, 1/92 – 12/97
Alliant International University - Instructor, 1/90 – 5/11
University of North Texas – Teaching Fellow, 8/86 - 8/88

Create, monitor and update 9 graduate and undergraduate Marketing courses (blended and online versions) at Brandman University: 2011 – Present
Professional Experience in Education continued

Facilitate and monitor performance of marketing adjunct faculty in Business and Professional Studies school

Represent Brandman University through presentations at American Association of Colleges and Universities, Lilly Foundation, CSUF Assessment Conference all in 1Q 2014 and 2015.

Voted by fulltime faculty President of Faculty Assembly for a 2 year term 2013-2015 academic calendar overseeing faculty leadership reporting to Executive Vice Chancellor and Board of Regents.

Selected in first year at Brandman University – Member of university-wide General Education Taskforce – 2010-2011

Selected in second year at Brandman University – Member of university-wide Curriculum Academic Committee (CAC) – 2011-2012. Elected Chairman of CAC for 2012–2013 academic year and served as member of Faculty Executive Committee 2012 – 2013.

Coordinated and guided the development of a Business Society of Brandman University students targeting students, alumni of Business & Professional Services.

Teach and taught Global Strategies, International Marketing and Competitive Success to business executives and graduate students from Asia, Europe, Middle East and South America. San Diego State University – American Language Institute (one class in Winter annually for last 7 years) -- Facilitator since 1989

Managed the graduate curriculum at the San Diego campus of the University of Phoenix, 6/95 to 8/98. Instituted the Annual Curriculum update and review day for all faculty since 1995. Appointed Area Chair overseeing the development, implementation of all graduate marketing courses as well as faculty training and monitoring.

Lead six teams of 4-5 faculty and participated as team member twice that either totally developed, designed or re-developed graduate courses and faculty instruction modules Fall 1995 through Spring 1999. All these efforts were for system-wide implementation and included faculty from around the United States. Courses covered Introduction to Management Systems, Change Management, Learning Organization, Planning the Organization’s Future, Managing Money - The Bottom Line, Global Management.
Professional Experience in Education continued


Doctoral Committee Member at California International Business University, 1/11 – present.

Coordinated marketing and promotions campaigns for Flexivity (Ford), and San Diego Performing Arts League, Spring 2001 at San Diego State University and Point Loma Nazarene University marketing students respectively.

Designed and implemented the twice yearly Western Collegiate Sales Competition for students in Personal Selling classes directed out of University of San Diego, 1995 - 2010.

Academic Preparation


University of North Texas – Denton, Texas. August 1986 to August 1988. 90% coursework for Ph.D. in Marketing.

University of Dallas – Irving, Texas. Received MBA in May 1982.

UCLA – Los Angeles, California. Business courses from 1975 to 1978 for 33 hours.

Luther College – Decorah, Iowa. BA, May 1971, in major in German, minors in political science, religion.

Professional Experience in Business

Total Recall Learning, Inc.® (TRL)-- Minimal responsibility for marketing, business development, strategic planning, curriculum development. TRL provides custom and pre-developed corporate training and academic courses in computer-based, adaptive learning, Internetable/online delivery format that guarantees up to 90% retention life-long. TRL facilitates learning in a highly interactive, multi-media format with real-time results tracking and reporting. Raised and sold over $800,000 startup, ongoing capital, and general sales.
Professional Experience in Business

**Becker Associates** – (Inactive). A multi-functional, interdisciplinary marketing and management consulting and learning firm with a primary focus on facilitating firms to “get, serve and keep customers at a profit.” Assignments ranged from developing business and marketing plans, identifying new markets, developing new services or products and conducting proprietary and “for client” marketing research to providing seminars on competitive intelligence, marketing techniques and tactics and decision making to all levels of executives.

Activities included being part of a team that set up an airline in Australia, putting together a team of three companies that designed and developed a state-of-the-art in-flight research service. Further, created and operated a unique tutoring referral service.

Conducted seminars on Decision Making, Marketing Tactics and Competitive Intelligence throughout U.S., Mexico, Venezuela and Colombia.

Clients included companies such as American Airlines, DEVCOR Software Design, Suntrust Properties, In-Flight Phone Company.

**International Airline Passengers Association** – Director of Marketing and Member Benefits. Developed 5-media membership solicitation and use campaigns for over 100,000 members resulting in 105% increase in volume. Directed hotel and car rental program negotiations covering over 3,800 hotels and 4 major car rental companies. Increased membership by 14%. Implemented $4 million travel agency service to 30,000 U.S. members. Designed internal and external promotions and managed airline relations domestically.

**Western Union Travel Industry Services** – Director of Marketing/Sales Planning. Was part of a 4 person “start-up” team that developed and implemented a “One Call” computerized clearinghouse for travel industry service buyers and sellers (over 9,000 hotels, airlines, car rentals, bus companies and implementation. Identified and bought media, advertising and direct mail services. Developed support and fulfillment systems, conducted market research projects. Increased customer base netting in 65% of company’s revenue.

**Great Western Sugar Company** – Manager of Customer Service - National Accounts. Responsible for all sales support and customer services activities for 65 accounts netting 60% of company’s revenue. Directed re-design of order-entry system, and enhanced customer service program.
Professional Experience in Business continued

Braniff International Airlines – Director of Passenger Services, Administration and Training. Directed over 215 employees in serving over 325,000 passengers monthly. Responsibilities included all facets of customer service, budgeting, staffing and contract administration. Developed and managed local advertising promotions increasing awareness over 41%. Established management development and training programs for 185 managers systemwide. Directed all (domestic and international) customer service and operational activities including the 747 fleet and improved reliability over 80% and customer satisfaction by 64%.

American Airlines – Sales and Service Supervisor. Responsible for performance of 25 salespeople and 50 flight attendants. Responsibilities included motivation, attendance, counseling, training, evaluation and service design and development. Promotional and incentive campaigns were designed with increases in output of over 25-40%.

Honors and Accomplishments

Presentations

Lilly Conference on Teaching and Learning – February 2015
“Lessons Learned from Competency-Based Education That Can Enhance Your Teaching Practice”

International Training Center of San Diego Global Knowledge University – December 2014
“Strategies for Organizational Synchronization and Sustainability”

Association for Global Business Management Information Computer Science: Online-Distributive Business Education – November 2014
“Factors Influencing the Strategic Direction of Business Schools Confronted with the Disruptive Innovations in the Area of Educational Technology” by Aparna Vashisht-Rota, Ph.D., René Naert, Ph.D. (contact person), Tim A. Becker, D.B.A..

International Conference on Business and Contemporary Issues by Northern State University – October 2014
“Competency-Based Education – At Your Convenience, At Your Students’ Convenience”

Served twice as Session Chair
Presentations continued

Conference on Business Innovation and Strategies at California State University Los Angeles – September 2014
“Maslow Extended to Fifteen Needs”

Conference on Assessment Practices at California State University Fullerton – March 2014
“Assessment Best Practices at a Rapidly Evolving Nontraditional University”

Lilly Conference on Teaching and Learning – February 2014
“Teaching Strategies to Enhance Student Learning”

International Training Center of San Diego Global Knowledge University – December 2013
“ETK Performance for Global Competitiveness Application and Strategies”

International Conference on Business and Contemporary Issues by Northern State University – September 2013
“Change...The Driver of Education Change and Adaptation”

Served as Session Chair.


International Conference on Business and Contemporary Issues by Northern State University – October 2012
“To Blend and Hybrid – How, Why, Oh My!”

“When in Rome...When in United States: What and How Much to Modify Courses When Teaching Foreign Students”

Distinguished Professor/Instructor Award

University of Phoenix – 1995
University of North Texas – 1988

Media Interviews

Channel 10 ABC-TV – December 2013, January 2014
V-Mag Feature-Univ. of Phoenix – October 2006
FOX 6 “In the Morning” – September 2006
Media Interviews continued

Marketing News (AMA) – January 1997
Air Transport World – Fall 1996
Aviation Week and Space Technology – Fall 1996
Dallas Morning News – September 1991
KUSI TV – August 1991

Publications

“HINTS of Marketing” – 2013-present
“Finance - Interdisciplinary Fundamentals” – co-wrote
“Street Talk” – July 2006
“Selling with Confidence” – January 2001
“Marketing Masterfully” – May 2000
“Flight Cache” – July 1997
“Decision Doctor 2E” – Summer 1997
“Challenge Givens” – July 1996

Articles

“Airlines Are Afraid of Marketing to Fearful of Flying,” San Diego Daily Transcript, 3/91
“Airline Safety Elasticity,” self-published, 1994
“Propshock,” Regional Airline Association, 1989
Semi-monthly article contributor to Bus Tours Magazine, 11 years
Miscellaneous

Marketing Club faculty coordinator, University of San Diego, 2007 - 2011
Adjunct faculty director/coordinator, Center for Educational Excellence, University of San Diego, 2009
Presented at TechEd, April 2009, “Successfully Integrating a Collaborative Wiki Tool into your Learning Environment.”
“Students Double Their Math Test Scores Using the Total Recall Learning Method.”
Presented at TechEd in Ontario, CA, April 12, 2008 detailing performance of students using retention-focused learning system in middle school and university settings – “How Do We Know They Know: Improving the Assessment of Knowledge Transfer and Retention with Technology.”
Board member (At Large to Master Association of StoneCrest) Spring Canyon Homeowners Association 2008, 2013-present
Board member San Diego Cooperative Charter School beginning April 2009
“How to Get a Job - Marketing Yourself” October 2006
SDSU Career Center’s Hall of Fame member 2000
Reviewer of Travel and Tourism text for West Publications 1997, 1996
Reviewer of Personal Selling text for West Publications 1992
Braniff International Distinguished Service Award – 1978
Braniff International work featured in Dallas Times Herald 1980
September 18, 2017

Dr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at Fortis College, Online which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at Fortis, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Kathryn Sellers, MS
[Educator at Fortis College]
September 14, 2017

Dr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Mr. Bounds:

I am an educator who works as Director of Business programs at American National University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including the Accrediting Bureau of Health Education Schools (ABHES) and the Distance Education Accrediting Commission (DEAC).

In my opinion as an educator, the comparative strengths of the ACICS standards include:

- tracking the completion rate of programs
- requiring in-service training of all faculty
- tracking the graduate placement rates
- requiring and tracking employer surveys
- monitoring the financial capability of the institution
- tracking the programmatic retention rates

As an educator at American National University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek
recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Mathew S. George
Program Director - Business Administration
American National University
1813 East Main Street
Salem, VA 24153

Tel: [612] 465-7890
Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

December 8, 2017

Dear Mr. Bounds:

It is with great pleasure that I am writing this letter to attest to the rigor of practice exercised by the Accrediting Council for Independent Colleges and Schools (ACICS).

As educator and scholar, I have had the honor to work for some of the best US state, private, and military institutions of higher education, accredited by the Southern Association of Colleges and Schools, Northwestern Commission on Colleges and Universities, Accrediting Commission for Community and Junior Colleges, Middle States Commission on Higher Education, Western Association of Schools and Colleges, among others. While working at Miami Regional University, I can confirm that ACICS standards, policies, and procedures have been consistent with the requirements adopted by other regional and national accrediting bodies. Faculty and staff are regularly trained and updated on the best practices enforced by ACICS to ensure that educators foster high academic standards and provide quality education for the students. Thus, I can attest that, by implementing ACICS standards and procedures, Miami Regional University has successfully graduated professionals who are currently greatly valued in their field.

As a faculty member at Miami Regional University, I can attest that my colleagues and I are passionately dedicated to our profession, we hold high ethical and academic standards, and we are proud to make a difference in our students’ lives and the lives of the patients looked for by our students. Therefore, I strongly support the efforts undertaken by ACICS to validate its standards and regain the recognition of the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

Please consider this letter as an expression of support for ACICS.

Giana Gancedo, Ph.D.
Associate Professor of English.
December 6, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Mr. Bounds,

I am the Associate Dean and Associate Professor for the School of Graduate Studies at Miami Regional University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

In the spirit of support, it is with great pleasure that I take the time to write this letter to express my view as a leader and academician that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies.

This is supported through my experience, working with other institutions of higher education, accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools.

ACICS criteria is clearly identified, allowing school administrators to effectively implement policies to assure academic standards and provide quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As a member of the administrative and faculty team at Miami Regional University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Respectfully,

[Signature]

ARNP, ACNP-BC
Associate Professor
Schools

700 S. Royal Poinciana Blvd., Suite 100 | Miami Springs, FL 33166 | 305-442-9223 | mru.edu
officeofacademicaffairs@mru.edu
December 6, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Mr. Bounds,

I am an Associate Professor and Chair of the Family Nurse Practitioner (FNP) program for the School of Graduate Studies at Miami Regional University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

In the spirit of support, it is with great pleasure that I take the time to write this letter to express my view as a leader and academician that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies.

This is supported through my experience, working with other institutions of higher education, accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools.

ACICS criteria is clearly identified, allowing school administrators to effectively implement policies to assure academic standards and provide quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As a member of the administrative and faculty team at Miami Regional University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

(6)

IP-BC
FNP Program

700 S. Royal Poinciana Blvd., Suite 100 | Miami Springs, FL 33166 | 305-442-9223 | mru.edu
officeofacademicaffairs@mru.edu
December 6, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Dear Mr. Bounds,

I am an Assistant Professor for the School of Graduate Studies at Miami Regional University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

In the spirit of support, it is with great pleasure that I take the time to write this letter to express my view as a leader and academician that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies.

This is supported through my experience, working with other institutions of higher education, accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools.

ACICS criteria is clearly identified, allowing school administrators to effectively implement policies to assure academic standards and provide quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes.

As a member of the graduate faculty at Miami Regional University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.
Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

December 6, 2017

I am Vice Dean and Professor in the Office of Academic Affairs at Miami Regional University. We are an institution currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

As an educator and administrator at MRU, I would like to further communicate my endorsement of ACICS accreditation standards, policies, procedures and decisions that are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. My endorsement is based on my experience of working at other institutions of higher education that are accredited by such recognized accrediting agencies as Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria are clearly stated, allowing school administrators to set policies that ensure a quality education for students. If changes are made to criteria, ACICS both informs the schools of these changes, and provides detailed rationale for the changes. Administrators know who to call at ACICS to receive prompt responses to their questions.

Federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators and administrators such as myself who work at ACICS-accredited institutions. In this spirit of support, I stand firmly by the efforts of ACICS to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

Thank you for receiving this letter as an expression of my firm support for the agency.

Vice Dean and Professor
Office of Academic Affairs
Miami Regional University

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December 7, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at Schiller International University which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). I am also an active member of the Madrid Campus Effectiveness Committee. I am a graduate of Schiller International University and also of Lake Forest Graduate School of Management. I am an official consultant for the Spanish Government (ICEX) Instituto de Comercio Exterior, I also own Avertica Consulting Group and have many years of international business experience, particularly in the US, Mexico and Canada as well as in Europe.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. In addition to meeting ACICS standards, the Madrid Campus of Schiller International University complies with local accreditation requirements for private Universities in Spain and our degree is recognized as equivalent a Bologna accredited degree in the Europe. This corresponds to regional accreditation in the USA according to NACES evaluations.

ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.
As an educator at Schiller International University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Edgar Barroso
Faculty Member at Schiller International University (Madrid Campus)
EBarroso@schiller.edu
December 7, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at Schiller International University which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). I also serve on the Campus Effectiveness Committee and am a Program Lead. I bring a unique background in the field of communications that includes a successful record in journalism, creative advertising, lobbying, cultural management and teaching at Spain’s leading business school Instituto de Empresa. For twelve years, I managed the communications in Spain and Portugal of a top world corporation, developing a multi-faceted expertise in corporate communications, regulatory affairs and issues management. I hold a double major in Political Sciences and Sociology from Tel Aviv University and a Master in International Affairs from New York University

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. In addition to meeting ACICS standards, the Madrid Campus of Schiller International University complies with local accreditation requirements for private Universities in Spain and our degree is recognized as equivalent a Bologna accredited degree in the Europe. This corresponds to regional accreditation in the USA according to NACES evaluations.
ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at Schiller International University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

José Pinto
Faculty Member at Schiller International University (Madrid Campus)
JBPinto@schiller.edu
Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education

LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at Schiller International University, Online which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at Schiller, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions.
Please consider this letter as an urgent request to take my 20 years’ experience as National Marketing Manager with Bic Corporation and over 15 years instructing marketing classes at ACICS universities to continue sharing this institutional knowledge with future students.

Professor Henry Lachapelle
Adjunct Faculty
Schiller International University
December 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Mr. Bounds:

The purpose of this letter is to recommend reinstatement of ACICS as a national accreditor for higher education. Between regional accreditors and vocational accreditation bodies there is a large gap, and there is a real need for accreditors such as ACICS to evaluate and confirm academic career-oriented institutions such as IGlobal University. Vocational schools are highly skills-oriented which defines accreditation needs at a hands-on, highly-structured level oriented toward work in vocations such as heating and air conditioning, welding, auto mechanics and the like.

Our school does not fit into a strictly vocational model, neither are we a large university. Therefore we more properly fit into the model ACICS represents for mid-range, career-oriented academic institutions.

We have recently been subject to the painful process of aligning ourselves with ACCSC, a vocational school accrediting body. This is like fitting size twelve feet into size six shoes. Although we carefully examined all relevant ACCSC regulations, several issues emerged in a recent site visit that demonstrate this gap.

To “argue” and defend our position as an academic, career-oriented institution of higher education was challenging when discussing these matters with a vocational accreditor such as ACCSC, because the mind-set of a vocational approach is significantly different from that of a school with a more academic outlook. The value of higher education not only for its own sake but also for its practical application (using a scholar-practitioner model), is highly significant in our view, and does not fit well into a strictly vocational model.

Therefore, we feel that ACICS fills an important gap in United States accreditation of higher learning, and we would like to see it continue to provide accreditation for IGU and similar schools on a national level. For schools such as ours, a regional accreditation approach seems unnecessarily stringent and a vocational accreditation approach is not sufficiently academically oriented. The ACICS approach, with its decades of experience and long affiliation with the Department of Education, is the perfect approach for us and many similar schools, and we highly recommend its reinstatement with the U.S. Department of Education.

[Signature]

IGlobal University (IGU), Vienna VA
Dec 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at IGlocal University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at IGlocal University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

[b][6]

Dr. Abed Almala,
Graduate Lead Faculty Member at IGlocal University, Vienna VA
Dec 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at IGlobal University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

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As an educator at IGlobal University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Shelton Rhodes, PhD
Faculty Member at IGlobal University, Vienna, VA
December 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at IGlobal University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at IGlobal University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

[b][6]

Faculty Member at IGlobal University, Vienna, VA
December 15, 2017

U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Department of Education Staff:

I am very proud of Bay Area Medical Academy’s academic quality and the value students get for their education. To see groups of graduates, go on to fill positions at esteemed local hospitals fills me with immense gratification.

The curriculum at Bay Area Medical Academy is very thorough. We ensure our students are prepared for the occupational demands of Medical Assisting from start to finish. When they leave the classroom and go into their externships, I want them to be helpful, knowledgeable, and confident. To achieve this outcome, we train students through lectures, hands-on training, and simulation training with a curriculum that not only emphasizes the fundamentals of medical assisting, but also opens their eyes to the possibility of expanding upon their current healthcare career options.

I, and other faculty members, have worked at other much larger schools. The primary difference in my experience is the teaching staff at Bay Area Medical Academy have a much greater stake in the success of our students. This is evidenced by a number of practices we have collaboratively established with ACICS. One such practice is to integrate the professional experience into the classroom by creating opportunities for community involvement. We invite employers and employed graduates to speak about their facilities and the demands of the medical assisting profession. For example, we recently had Stanford Health Care and Zuckerberg S.F. General Hospital come to the campus to talk about their newest facilities, how to apply for opportunities, how to present themselves as attractive candidates, possible career ladders within their organizations, and the day-to-day duties of medical assistants.

Our faculty are very dedicated individuals who take pride in educating future medical assistants. We see our student’s ability to succeed in the field as a reflection of our ability to properly prepare them for the expectations of clinical facilities. We never want to rely on a static curriculum with the expectation that
students will learn the most relevant skills once they enter the workplace. Instead, we also hold regular meetings with employers to review our curriculum to ensure the material is both relevant and current, as well as updated to reflect current practices within medical facilities; we want students to be successful in the classroom and the workplace, which is why our career services plays such a prominent role with not only our graduates but our current students as well. We prepare students by holding mock interviews, resume workshops, talks using our close relationships with employers and acquired knowledge of employers' needs.

ACICS has been very good in encouraging our institution to establish practices that reflect the primary mission of our school, to operate in the best interests of our students and their futures.

Best Regards,

Andrea Earby
Assistant M.A. Program Director
Lead Medical Assisting Instructor
December 15, 2017

U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Dear Department of Education Staff:

It is refreshing that the Accrediting Council for Independent Colleges and schools (ACICS) has core education values mirroring those of Bay Area Medical Academy. The ideals expressed during the Accreditation process were that students are the primary focus.

They scrutinized the hiring of staff to ensure our instructors met their standards for years of experience in their perspective fields, continuing education, and proven experience teaching within their discipline.

ACICS took great care and consideration when reviewing our educational goals and learning outcomes. In doing so, ACICS analyzed and dissected Bay Area Medical Academy's curriculum to verify our teaching goals covered more than the basics within students' chosen fields. It is very clear to us they want students to receive a well-rounded education that goes beyond the classroom didactic.

During our accreditation visits, ACICS closely examined every detail of our education process and curriculum. They asked probing questions regarding various aspects of our programs and sought explanations as to how lessons will benefit the student. Throughout it was clear ACICS wanted to ensure students were not only getting tangible value for their tuition and efforts, but a comprehensive educational experience.

The ever important emphasis of the student's educational needs must come before profit and should be the ultimate goal. In my experience with ACICS, this all important value aligned well with our institution.

Sincerely,

Linda Madsen
Pharmacy Technician Instructor
To Whom It May Concern:

Laurus College’s accreditation through ACICS is of vital importance to our school. Not only does it assure students that the courses they undertake and the curriculum they master is relevant to their field of study but also that the education they receive is accepted in the world beyond the classroom.

As a faculty member at Laurus College for more than a year, and as a recent graduate of Laurus College’s Information Technologies and Network Systems program, I’ve experienced ACICS’s accreditation process having positively impacted the Information Technologies and Network Systems program in several key areas, including (a) academic quality, (b) curriculum development, (c) measuring learning objectives, and (d) instructional processes.

Just two of the more pertinent examples of this impact on my department are:

1. **Program Advisory Committee (PAC) Meetings.** The ACICS stipulation that our department host regular PAC meetings has a profound and continuing positive impact on the curriculum that this program presents to our students. By requiring our department to solicit input and guidance on our curriculum from committee volunteers who work in the IT field, our faculty is able to regularly interact with IT professionals who provide meaningful observations on our curriculum, meaningful observations on the relevance of the technologies we teach, and useful insights into all emerging technologies. Our department modifies our curriculum in response to the observations collected during these meetings. This process ensures our department provides the most relevant curriculum on the most current technologies because that curriculum is influenced by guidance from IT industry professionals.
   - **Most Recent Illustration:** A PAC member observed that our curriculum did not include Microsoft’s most recent Windows Server 2016 operating system and that we were still teaching the aging Windows 2008 R2 operating system. We adjusted our curriculum accordingly to ensure our students are knowledgeable in the most current technologies, thus more employable.

2. **Faculty Development.** The ACICS requirement that our faculty engage in ongoing professional development has a measurable, positive impact on our staff, which waterfalls to our students. Our faculty freely tell our students that we are taking our own IT classes at night; we demonstrate that learning is a lifelong pursuit and that none of our faculty is so good that he/she cannot improve and know just a little bit more. This ongoing development helps our faculty stay up to date on relevant and emerging technologies, and we all integrate our own recent learnings into lectures for our students.
   - **Most Recent Illustration:** Myself and several colleagues are currently enrolled in the same cybersecurity class. We all are learning massive amounts, and we all integrate cybersecurity concepts we learned the night before into the following day’s lecture for our students.
The presence and guidance of ACICS has opened the door for greater professional development within Laurus College, which has had a positive impact on both my teaching methodologies and my interactions with students.

It is my sincere hope that Laurus College will have the opportunity to continue working with ACICS in the coming years.

Sincerely,

Randall Lewis

Instructor, Information Technologies and Network Systems

Laurus College
December 14, 2017

To Whom It May Concern:

Laurus College’s accreditation through ACICS is extremely important to our school. Not only does it assure students that the courses they undertake and the curriculum they master is relevant to their field of study, but also accepted in the world beyond the classroom.

As a faculty member at Laurus College for 5 years, I’ve experienced ACICS’s accreditation process having positively impacted the Medical Billing and Coding program in several areas including academic quality, curriculum development, measuring learning objectives, and instructional processes.

For example:

After reviewing course evaluations for several terms, we discovered a pattern of students feeling that the course content was moving too quickly in our MED150 Understanding Health Insurance course. After discussing with our department staff, we created additional learning materials to help supplement the course. We then presented these materials to our Medical Billing and Coding Program Advisory Committee, and implemented once the materials received final approval from our School Chancellor.

The following several term’s course evaluations showed an improvement in student’s ratings for the courses learning materials, and fewer comments pertaining to course pacing.

The presence and guidance of ACICS has opened the door for greater professional development within Laurus College, which has had a positive benefit on both my teaching methodologies and student interactions.

It is my sincere hope that Laurus College will have the opportunity to continue working with ACICS in the coming years.

Sincerely,

Director of Medical Billing and Coding Dept.
December 13, 2017

To Whom It May Concern:

Accreditation is of great importance to our school. Not only does it assure students that the courses they undertake and the curriculum they master is relevant to their field of study, but also accepted in the world beyond the classroom. A good accreditor, such as ACICS, has had a powerful impact on Laurus College by helping us to create a professional learning community and establishing measurable learning objectives.

As a faculty member at Laurus College for 3 years, I’d like to share my thoughts on how ACICS’s accreditation process has positively impacted the PBS program.

ACICS is very rigorous and has high standards, which for our department, precipitated deep reflection as we examined our courses, course curriculum, and learning objectives. This systematic process facilitated hearty academic discussion within our department, led to many innovative ideas that helped us create more learner-centric assignments, and assisted our students in engaging more deeply with the learning material.

The presence and guidance of ACICS has opened the door for greater professional development within Laurus College which has had a positive benefit on both my teaching methodologies and student interactions.

It is my sincere hope that Laurus College will have the opportunity to continue working with ACICS in the coming years, and that we will be able to forge ahead with this valuable partner in our commitment to academic excellence.

Sincerely,

Steve Ryan

Professional Business Systems

Faculty

Laurus College

(805) 684-3443

Santa Maria, CA 93454

www.lauruscollege.edu
December 12, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support for Accrediting Council - Independent Colleges and Schools
from University Professor

Dear Mr. Bounds:

I am an educator who works as a faculty member at Southern States University, in Newport Beach, California. This post-secondary school is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). You can find my profile on the list of faculty: http://www.ssu.edu/academics/faculty/. Prior to becoming a teacher at the later named school, I worked in educational administration for approximately fifteen (15) years as an Assistant University Dean and later as a Dean of Academics. A respectable amount of my work dealt with, at times, accrediting agencies on a state, regional/ federal level, and their respective guidelines, mandates or requirements.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at Southern States University and, in my opinion, are consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by recognized accrediting agencies including, but not limited to: (i) The Southern Association of Colleges and Schools (ii), Western Association of Schools and Colleges, (iii) Accrediting Commission of Career Schools and Colleges, and (iv) Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. Nothing is open to any degree of misinterpretation or ambiguity. If any changes are made to the criteria, it is my understanding that ACICS timely informs the school(s), providing relevant details and the controlling rationale for the modification(s). Administrators know who to contact at ACICS to get thorough and expedient answers to any and all questions.

As a teacher at Southern States University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016. The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including educators such as myself who work at ACICS accredited institutions. Please consider this letter an unconditional expression, without any reservation(s) whatsoever, as to support for the agency. Towards that end, hopefully this correspondence will receive due consideration.

Sincerely,

[Signature]

Dianne Carter MA/JD

Fashion Valley Campus
123 Camino de la Reina
Suite 100 East
San Diego, CA 92108
(619) 294-1829
www.ssu.edu

Newport Beach Campus
1601 Dove Street
Suite 105
Newport Beach, CA 92660
(949) 833-8868

Las Vegas Campus
3100 W Sahara Ave
Suite 108
Las Vegas, NV 89102
(702) 786-3788
info@ssu.edu
December 11, 2017

Mr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202

Re: Letter of Support from Institutional Educator

Dear Mr. Bounds:

I am an educator who works as a faculty member at Southern States University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). I teach courses in mathematics, statistics, and marketing. You can find my profile on the list of faculty: http://www.ssu.edu/academics/faculty/

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at Southern States University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Matthew Alcala, M.A.
Adjunct Faculty, SSU
Case Name: In the Matter of Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-9
Herman Bounds Jr., Ed. S.,
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Director Bonds:

I am writing to you to support the acceptance of the standards, policies, and procedures the Accrediting Council for Independent Colleges and Schools (ACICS).

Since February of 1983, I have taught numerous courses in the electrical/electronic technology programs at New York City College of Technology (NYCCT). I have also participated in many ABET and Middle State accreditations for my college. My academic credentials include a BEE from the City College of NY, a MSEE from the Polytechnic Institute of NY, and an active NYS PE license.

I have been affiliated with ACICS since 1999 as an accreditation evaluator for institutions offering electrical/electronic programs. I have participated in 46 nationwide ACICS evaluation visitations.

Based on my experience with ACICS, I have found the accreditation procedures to be very professional and embedded with a high degree of integrity and compliance. Although my institution (NYCCT) is not an ACICS accredited school and does not have articulation agreements with ACICS, the policies, criteria and procedures of ACICS strongly support the educational goals of private educational institutions in helping students obtain a meaningful education in order to obtain gainful employment.

If you have any questions or concerns, please feel free to contact me at

Sincerely,

Professor Kenneth Mackowitz
I am no longer involved in administration as I am a retired educator who served 55+ years in nursing and nursing education. Serving as a retired administrator I am an accreditation visitor who has the greatest respect for the work done by ACICS. The extensive review of nursing programs I have been involved in gives me confidence in the graduates these programs graduate. I am in strong support of ACICS and the service they provide to colleges and schools.
September 13, 2017

Dr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Mr. Bounds:

I am currently serving as Professor Emeritus at Monterey Peninsula College, which is currently accredited by the Accrediting Commission for Community and Junior Colleges (ACCJC) and an active professional educator affiliated with the International Society of Business Education. My resume indicating my professional qualifications is attached for your reference. I have worked with the Accrediting Council for Independent Colleges and Schools (ACICS) as a volunteer evaluator on multiple ACICS site team visits—most recently serving as business program specialist at the American College of Commerce and Technology.

This letter is to communicate my view as an educator from a non-ACICS institution that ACICS standards, policies, procedures and decisions are widely supported by educators outside of ACICS and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with California community colleges throughout the state and my experiences working as author, editor, and reviewer of numerous national and international professional journals and newsletters. As a vocational educator, I have found that the ACICS criteria focusing on student outcomes has been a model for our public vocational programs in California where, in the last 6 years, similar standards are now being expanded and implemented for all vocational and academic programs.

As an educator unaffiliated with an ACICS accredited institution, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, policies, and procedures as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who are unaffiliated with ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Judgeé A. Timm, Ph.D.
Professor Emeritus, Business & Technology
Monterey Peninsula College

Dr. Walter Tribely, Superintendent/President | 980 Fremont Street, Monterey, CA 93940 | (831) 646-4000 | www.mpc.edu
Edward G. Thomas

September 13, 2017

Dr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Dr. Bounds:

Having served the Accrediting Council for Independent Colleges and Schools as a member of almost 100 evaluation visit teams since 1975 and having served two different times as a Commissioner, I may have a somewhat unique perspective on ACICS’s standards, policies, procedures and decisions. Although I am now retired, I spent some 38 years teaching in business education and marketing at Cleveland State University (CSU) in Cleveland, Ohio. Early in my career, I was introduced to the ACICS accreditation process by Dr. John E. Binnion, who was my department chair at CSU and who had been chairing visits teams for many years at the time. It was his feeling that educators at traditional colleges and universities should become acquainted with the policies and operations of proprietary business schools both to better understand the full range of education for business and to help make a positive impact on the policies and processes of these non-traditional institutions. So, I completed the evaluator training process and began making visits in 1975.

As indicated above, I have been a member of numerous visit teams, serving as the team chair on all but a handful of those visits. Although all my visit teams had members who were employed by ACICS-accredited institutions, I also served with many educators who, like myself, were from traditional colleges and universities or were engaged in other education-related careers. One of the first things I noticed when I began making evaluation visits was how much those from traditional institutions appreciated the role that ACICS-accredited institutions played in providing educational opportunities to students who may have had no other path to a better life. It also became quickly apparent that all the team members, regardless of their employment affiliation, were determined to make sure that the institutions being visited were adhering to all the ACICS accreditation standards.

In 1994, I was appointed to the ACICS Council as a “public member” to fill out the term of a member who had resigned. I served for four and a half years of the five-year term. Much like my experience on visit teams, I was struck by how serious the Council members were in carrying out their responsibilities, regardless of their employment affiliations. Several members of the Council at the time were from non-ACICS-accredited institutions, and we often talked among ourselves about how well-developed the accreditation standards were and how much they could help guide accredited schools and those seeking accreditation. In fact, we joked that our own institutions would have been hard-pressed to achieve accreditation from ACICS. Since most of us were from public or private institutions accredited by recognized regional accrediting agencies, we knew what we were talking about.
In December of 2011, I was again appointed to the ACICS Accrediting Council to fill out the term of a Commissioner who had resigned. Although the industry had undergone a number of changes over the intervening years, one thing was still the same—all those who were serving on the Council, regardless of affiliation, were still people who believed in the accreditation process and in the need for accredited institutions to serve a large population of non-traditional students.

Since I am still a Commissioner for ACICS, I know firsthand the efforts the agency has made to clarify and strengthen its standards during the past year. As an educator representing the “public” on the Council, let me state that I (and many other educators from the public higher education community) support ACICS’s effort to seek recognition by the U. S. Department of Education as an accrediting agency.

Sincerely,

Edward G. Thomas
Case Name: In the Matter of Accrediting Council for Independent Colleges and Schools

Docket No.: 16-44-O

Filing Party: Respondent, Accrediting Council for Independent Colleges and Schools

Exhibit No.: B-O-10
September 18, 2017

Dr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Mr. Bounds:

I am an educator who works as an adjunct faculty at Fortis College, Online which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including Southern Association of Colleges and Schools, Western Association of Schools and Colleges, Accrediting Commission of Career Schools and Colleges, and Accrediting Bureau of Health Education Schools. ACICS criteria is clearly stated, allowing school administrators to know exactly how to set policies to assure a quality education for students. If any changes are made to the criteria, ACICS informs the schools, providing details and rationale for the changes. Administrators know who to call at ACICS to get quick answers to their questions.

As an educator at Fortis, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

Kathryn Sellers, MS
[Educator at Fortis College]
Letter of Support – Educator at ACICS Accredited Institution

September 14, 2017

Dr. Herman Bounds, Jr.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
LBJ Building, 400 Maryland Avenue, S.W.
Washington, DC 20202


Dear Mr. Bounds:

I am an educator who works as Director of Business programs at American National University, which is currently accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). My resume indicating my professional qualifications is attached for your reference.

This letter is to communicate my view as an educator that ACICS accreditation standards, policies, procedures and decisions are widely supported at this institution and consistent with the minimum standards required of other national and regional accrediting agencies. This view is based on my experience working with other institutions of higher education accredited by other recognized accrediting agencies including the Accrediting Bureau of Health Education Schools (ABHES) and the Distance Education Accrediting Commission (DEAC).

In my opinion as an educator, the comparative strengths of the ACICS standards include:

• tracking the completion rate of programs
• requiring in-service training of all faculty
• tracking the graduate placement rates
• requiring and tracking employer surveys
• monitoring the financial capability of the institution
• tracking the programmatic retention rates

As an educator at American National University, I strongly support the efforts that the agency has taken to clarify and strengthen its standards, as well as its current effort to seek
recognition by the U.S. Department of Education as an accrediting agency, consistent with its status prior to 2016.

The federal regulations applicable to agency recognition provide that ACICS must demonstrate wide acceptance of its standards, policies, procedures and decisions, including by educators such as myself who work at ACICS accredited institutions. Please consider this letter an expression of support for the agency.

Sincerely,

(b)(6)

Mathew S. George
Program Director - Business Administration
American National University
1813 East Main Street
Salem, VA 24153

Tel: (b)(6)
Case Name: *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-11
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