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-14
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

RE: Educator Letter of Support - 34 C.F.R. § 602.13

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,

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