

**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-22



September 18, 2017

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

Re: ACICS- 34 C.F.R. Sec. 602.13 – Acceptance of Agency

Dear Mr. Bounds

This letter is about the request by the Accrediting Council of Independent Colleges and Schools (“ACICS”) in the matter of its pending application for initial recognition as an accrediting agency.

ACICS has informed us that they intend to file an initial application for recognition as an accrediting agency to avoid further disruption to currently accredited ACICS Institutions and the students who attend these Institutions.

We watched the extraordinary politics at play over the revocation of the accreditation of ACICS by the previous administration. While we take no official position on the status of the pending litigation, we feel compelled to communicate with you as to what our experience has been with ACICS.

Since CAPPS was created in 1985, we have worked with thousands of Private Postsecondary Institutions in California and their respective Accreditors. We work with all National Accreditors, our Western Regional Accrerator, and many Programmatic Accreditors. My personal experience with ACICS dates to 1998 when I became Executive Director of CAPPS.

We have utilized the knowledge and expertise of ACICS staff and member schools for everything from testimony in our State Legislature and regulatory agencies on accreditation matters as it affects laws and regulations, to technical assistance and advice to our Association. They have often given guidance on how to comply with existing Federal, State and Agency requirements that often do not complement each other. We have found that ACICS staff and members to be extremely knowledgeable about the complexities of California requirements and have no reservations about the veracity of their statements. They are regular presenters and panelists at our Conferences and are respected sector wide.

We have found ACICS to be an excellent technical resource, thought leader and quality thinker regarding issues of the day. As they are one of the few Accreditor of degree granting institutions in California, the length and breadth of their contact with our Association is deeper and more frequent than most other Accreditors. I can state with no reservations that the standards, methods of evaluation and accreditor decisions are essentially equal or superior to other accreditors.

I would deviate just a bit to point out regarding past ACICS accreditor decisions that were deemed "wrong," at least one Regional Accreditor and one other National Accreditor essentially made the same findings on the same Institution that ACICS did and they received virtually no sanctions or criticism (only ACICS).

We believe, given the current situation, that the ACICS initial submittal allows the Department to view bottom to top the ACICS proposed structure in detail. ACICS, its member Institutions and their students who have done nothing but strive to complete their educational programs and graduate, deserve a thoughtful and fair review as to whether they are worthy of being an Accreditor. We believe that they are. I am available to discuss ACICS and this matter at your convenience should you wish.

Thank you for taking the time to consider our thoughts in the matter.

Sincerely,

(b)(6)

Robert Johnson  
Executive Director, CAPPs

Cc: ACICS  
CAPPs President

September 11, 2017

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

Re: ACICS – 34 CFR 602.13 – Acceptance Agency

Dear Dr. Bounds:

Career Education Colleges and Universities is the national association serving our country's postsecondary career education colleges and universities. We require that all members of our Association be licensed in their state, accredited by a recognized accreditor, and be eligible for Title IV programs. At the time the Department revoked ACICS accreditation, no less than 116 member campuses were accredited by ACICS.

The simple reality is that by 2024, the Bureau of Labor Statistics projects that our nation will need 46.5 million new workers. Sixty-five percent of all replacement jobs and 85 percent of all new jobs require some level of postsecondary education. As the Lumina Study and others show, our nation is not going to meet the skilled demand of our future workforce. Unfortunately, we have already seen the evidence of schools accredited by ACICS announcing their closure simply because they do not believe they can become accredited by a new accreditor within the current amount of time, considering the costs of seeking new recognition. For many schools, this cost has exceeded \$100,000!

There can be a debate about whether the revocation of ACICS' recognition was justified. But, there can be no debate about the need. Other accreditors have made clear they simply do not have the resources to expand their accreditation to include all schools impacted by the decision. At the same time, ACICS has taken the important and significant steps to address those deficiencies listed by the Department.

For the sake of the 3.2 million students currently engaged in postsecondary career education, and those additional students now needed due to natural emergencies such as Hurricanes Harvey and Irma, we strongly encourage the Department to recommend ACICS' recognition as an accreditor be restored at the earliest possible date.

Sincerely,

(b)(6)

Steve Gunderson  
President & CEO



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: Accrediting Commission for Independent Colleges and Schools (ACICS)

Dear Dr. Bounds:

The Arizona Private School Association is a collaborative community of Private Higher Education Providers and has remained uniquely positioned to meet the changing needs of our students as well as the on-going demands of the workforce for the last fifty years. We have been the recognized voice of private postsecondary education in our state since 1967.

The Accrediting Commission for Independent Colleges and Schools (ACICS) was founded in 1912 and its mission has remained the same. "To establish and advance the quality of education and the standards of excellence at private career schools and colleges". ACICS schools are leaders in workforce education preparing graduates to fill the growing occupational and professional needs within growth sectors across our nation. As the largest accreditor of private career schools, ACICS has recently enacted broad reforms to strengthen its effectiveness and oversight of member institutions.

We have ACICS accredited institutions as members of the Arizona Private School Association. Just like APSA, these schools are guided by the standards of honesty, integrity and excellence. Completion rates and placement rates at our schools are significantly higher than comparable public postsecondary institutions.

On behalf of the Member Schools and the Board of Directors of the Arizona Private School Association, we make it clear that APSA has and continues to accept ACICS as an accrediting agency and recommend their reauthorization as a national accrediting body for private postsecondary institutions. Thank you for your time and consideration Dr. Bounds.

Regards,

(b)(6)

Fred Lockhart  
Executive Director



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: Accrediting Commission for Independent Colleges and Schools -- Initial Petition  
for Recognition

Dear Dr. Bounds:

I am writing on behalf of the Pennsylvania Association of Private School Administrators (PAPSA), a non-profit state trade association representing over a hundred accredited institutions of higher education offering career training programs. Since its inception, PAPSA has been one of the largest and strongest state associations representing career schools in the country and issues related to accountability and educational quality are the utmost priority of PAPSA.

We write to convey our longstanding and current acknowledgment of the accreditation activities of the Accrediting Commission for Independent Colleges and Schools (ACICS), as they relate to our ACICS-accredited PAPSA members.

Accreditation is very important to PAPSA. Our membership includes institutions that are accredited through multiple different institutional accreditors, including both national and regional accrediting agencies. Some of our members even hold multiple institutional and programmatic accreditations. With respect to ACICS-accredited institutions, PAPSA has for decades welcomed such institutions and recognized them as accredited entities on the same basis as other institutionally-accredited PAPSA members. Many of these schools have existed for decades and are well-respected higher education institutions in their communities and are in good standing with the Commonwealth of Pennsylvania and our state's licensing and regulatory

bodies. These schools have also participated in a valued and meaningful way in the career education related activities of our association, whether on the PAPSA Board, on our committees, or in PAPSA trainings and conferences, and on the same basis as other accredited members of our state association.

ACICS accredits hundreds of institutions across the country. PAPSA is aware ACICS has undergone rigorous scrutiny over the last two years by the Department related to serious lapses by a small minority of their accredited institutions. Although PAPSA cannot comment on what may have happened in these lapses, nor ACICS' response at the time of these cases, it is our understanding ACICS has undertaken significant efforts to address alleged deficiencies in its policies and procedures to strengthen its case for recognition as an accrediting agency by the Department. In addition, it is important to note that many schools accredited through ACICS have indicated they have seen first-hand the increased accountability and improved processes recently undertaken by ACICS as a result of their updated policies and procedures.

Thank you for your consideration of this letter.

Sincerely,

(b)(6)

Aaron M. Shenck  
Executive Director - PAPSA