

**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-36



## **COURT REPORTERS BOARD OF CALIFORNIA**

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August 5, 2016

Emma Vadehra  
Chief of Staff to the Secretary of Education  
U.S. Department of Education  
400 Maryland Avenue SW  
Washington, D.C. 20202

Dear Ms. Vadehra,

I write to you today in support of ACICS retaining recognition by the Department of Education (DOE). While we understand the real concern that some private schools have posed to the DOE with this accreditation, please consider carefully the impact of totally denying recognition to ACICS and lumping all private schools into the troubled few.

In California, we have five ACICS-accredited private court reporting colleges that have produced 71 percent of the licensed court reporters in the state since 2009. Removal of the ACICS accreditation would put extreme hardship in both time and money on the private court reporting programs; more specifically, the student population and their families who have invested in their court reporting education.

If a loss of accreditation led to the closure of these private schools, students would be forced to move to a public school program, many of which have limited capacity to accept new students. If the public programs do not have space or are geographically impractical, the student is then limited to online-only schools, which presents many challenges to learning a skills-based profession that on average takes 3 to 5 years to complete.

Additionally, the court reporting industry as a whole will suffer by a decision of the DOE to remove ACICS. This industry includes attorneys, judges, courts, deposition agencies, colleges where CART is provided for the deaf and hard-of-hearing, and captioning of certain venues required by legislation. Disruption of the judicial system is as impactful as reduced access to education by the deaf and hard-of-hearing community.

The adverse publicity and the costs associated with re-approval by the state Bureau of Private Post-secondary Education and the time and expense involved in finding a new accrediting agency will negatively impact these small colleges that are already vulnerable because of declining enrollments at a time when the need for court reporters is at the highest level nationwide and a shortage is projected to be imminent.

If these colleges cease to exist, the livelihoods of many involved in the schools will also be impacted. Those adversely affected, include, but are not limited to software vendors, school employees, deposition agencies, future court reporters, and the general public who rely on an accurate record --

along with the justice system in the State of California and in other states that recruit graduates from these five schools.

It is our hope that you are able to work out an alternative solution that would better address the problem without negatively impacting over 300 colleges nationwide and 700,000 students. Court reporters play a vital role in the administration of justice, and lessening the number of accredited court reporting schools at this time only replaces one problem with another.

Best regards,

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Davina Hurt  
Chairperson