

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-49

Robert J. Sullivan, CSR #5646
Official Court Reporter (ret)
County of Orange, California, Superior Court

July 22, 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,

My name is Robert Sullivan, and I recently retired with nearly 30 years' service as an Official Court Reporter in Orange County, California, Superior Court. I am currently working part-time as a Court-Approved Pro Tem Reporter, as well as proctor and reader for the California State Court Reporters Exam. As a stakeholder in the ever-widening profession of court/deposition/CART reporting/captioning, and just as importantly as a graduate and former teacher at South Coast College of Court Reporting, one of the greatest reporting schools in the state, I support the ideas put forth in the letter sent to you by Brent Murphy, President of Radiological Technologies University-VT and the other university/college presidents, in support of ACICS retaining recognition by the Department of Education.

In California where the five ACICS-accredited private colleges produce 71 percent of the CSRs produced in the State since 2009, and the nine public colleges produced 29, the court reporting industry as a whole will suffer by an adverse decision of the DOE, including: 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.

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 stenographers is at the highest level nationwide. If these colleges cease to exist, the livelihoods of many involved in the schools will 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.

I sincerely hope that you consider the impact of totally denying recognition to ACICS and hope that you are able to work out with ACICS an alternative solution that would better address the problem without negatively impacting over 300 colleges nationwide and 700,000 students.

Thank you for your attention to this matter.

(b)(6)

Robert J. Sullivan, CSR #5646
Official Court Reporter (ret)



Bob Sullivan is with Neal Tanoue and 2 others at [South Coast College](#)

December 10 at 11:41am Orange

As a Director of the California Court Reporters Association I would like to thank everyone who participated in yesterday's "Pack the School" event (with a very special thank you to my good friend Mike Chiaravalloti, Court Reporter Manager for the Orange County Superior Court). What an amazing profession!



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