

## U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

### Recommendation Page

1. **Agency:** Accrediting Commission Of Career Schools and Colleges ( 1967 / 2011)  
(The dates provided are the date of initial listing as a recognized agency and the date of the agency's last grant of recognition.)
2. **Action Item:** Petition for Continued Recognition
3. **Current Scope of Recognition:** The accreditation of postsecondary, non-degree-granting institutions and degree-granting institutions in the United States, including those granting associate, baccalaureate and master's degrees, that are predominantly organized to educate students for occupational, trade and technical careers, and including institutions that offer programs via distance education.
4. **Requested Scope of Recognition:** Same as above.
5. **Date of Advisory Committee Meeting:** 06/23/2016
6. **Staff Recommendation:** Continue the agency's recognition as a nationally recognized accrediting agency at this time, and require the agency to come into compliance within 12 months with the criteria listed below , and submit a compliance report due 30 days thereafter that demonstrates the agency's compliance.
7. **Issues or Problems:** It does not appear that the agency meets the following sections of the Secretary's Criteria for Recognition. These issues are summarized below and discussed in detail under the Summary of Findings section.  
  
-- The agency does not meet the requirements of this section of the criteria. The agency must amend its definition to better comport to the Secretary's public member definition. [§602.15(a)(5)]

### Executive Summary

#### PART I: GENERAL INFORMATION ABOUT THE AGENCY

The Accrediting Commission of Career Schools and Colleges (ACCSC) is an institutional accrediting agency that accredits 685 institutions located throughout the United States, Puerto Rico, and the District of Columbia.

The agency's accredited schools offer certificates, academic associate degrees, occupational associate degrees, baccalaureate degrees and masters degrees and distance education programs, predominantly in occupational, trade and technical career areas.

Most of agency's accredited schools participate in the Department's Federal Student Aid program. As the Title IV gatekeeper for its accredited institutions, it must meet the separate and independent requirements of the Secretary's Criteria.

#### Recognition History

The Accrediting Commission of Career Schools and Colleges was previously known as the Accrediting Commission of Career Schools and Colleges of Technology (ACCSCT). Prior to that, it was called the Accrediting Commission for Trade and Technical Schools of the Career College Association and, prior to that time, the Accrediting Commission of the National Association of Trade and Technical Schools (NATTS).

NATTS was originally recognized in 1967 by the then-Commissioner of Education for its accreditation of trade and technical schools. Its scope of recognition was expanded in 1972 to include barber schools and again in 1978 to include all resident course offerings of private schools primarily engaged in trade or technical education.

In 1991, NATTS and the Association of Independent Colleges and Schools (AICS) became part of the Career College Association (CCA). Although the two associations merged into one organization, their accrediting commissions remained separate, even though they both functioned under the CCA umbrella, and each commission continued to accredit the same schools that it accredited under its former organization. After the merger, NATTS became known as the Accrediting Commission for Trade and Technical Schools of the Career College Association. In 1993, in order to conform to new Department regulations, the agency became separate from and independent of the CCA and was renamed the Accrediting Commission of Career Schools and

Colleges of Technology (ACCSC and subsequently dropped the "T".

When the agency was last reviewed in 2004, the agency requested an expansion of its scope of recognition to include institutions that offer programs via distance education. In 2005 the Secretary granted the expansion of scope, found the agency to be fully compliant with the criteria for recognition, and granted the agency continued recognition for a period of five years. In 2006, the agency was granted an expansion of its scope for recognition to include the accreditation of masters degree programs. ACCSC last appeared before the NACIQI in the spring of 2011 when the NACIQI recommend to renew the agency's recognition for a period of five years. The agency petition to the Secretary for continued recognition is the subject of this report. The Department did not receive any written third-party comments regarding this agency.

ACCSC had five complaints filed with the Department during the period since its last recognition. In each instance the Department found the agency in compliance with all of its standards and procedures.

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## PART II: SUMMARY OF FINDINGS

### **602.15 Administrative and fiscal responsibilities**

#### **(5) Representatives of the public on all decision-making bodies; and**

The agency provided its by-laws and supporting documentation which dictate that its decision-making body including the appeal body, include public members as required by this section of the criteria. The agency's Standards of Accreditation also specify that its decision making bodies meet the one to seven ratio for public members. Although not provided in this criterion, the agency provide an attestation in 602.15(a)(6) Conflict of Interest to demonstrate the agency's vetting processes and that it ensures public members meet the Secretary's definition.

However, the agency did not provide its policy publication containing its definition of public member in order for Department staff to ascertain if the agency's definition comports to the Secretary's definition. The agency did provide documentation to demonstrate that its commission and appeals panel include public members.

#### **Analyst Remarks to Response:**

In response to the Department's staff draft analysis, ACCSC provided clarification that, at its May 2016 meeting the Commission adopted the language contained in its revised accrediting standards (Exhibit 3a) to show that ACCSC has formalized a policy to require academic and administrator personnel on the appeals panel, and which continues to require a public member on the sitting appeals panel. The agency also provided information on appeals panel members' designation from ACCSC's two most recent appeals as evidence of ACCSC's long standing practice in this regard. (Exhibit 3e) for a roster of ACCSC standing appeals panel members that shows the designation of "academic" "administrative" and "public." Under ACCSC's Rules, an appeals panel member may hold more than one designation - for example a member may be designated as the Chair of the Sitting Appeals Panel and as an administrative representative or a member may be designated as a public member and as an academic representative - but in no case will a member be designated as both an administrative and academic representative. ACCSC definition as it applies to representatives of the public serving on the Accrediting Commission is found in Section 1.01 of the Bylaws (Exhibit 4a, PDF page 132). While the agency provided the location of its definition of public member, the language in the agency's definition does not specifically comport to the Secretary's definition. The agency must amend its definition to better comport to the Secretary's public member definition.

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## PART III: THIRD PARTY COMMENTS

The Department did not receive any written third - party comments regarding this agency.