

U.S. Department of Education Staff Report

to the

Senior Department Official on Recognition Compliance Issues

Recommendation Page

1. **Agency:** National Association Of Schools Of Theatre, Commission on Accreditation (1982 / 2014)
(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 throughout the United States of freestanding institutions that offer theatre and theatre-related programs (both degree and non-degree-granting), including those offered via distance education.
4. **Requested Scope of Recognition:** Same as above.
5. **Date of Advisory Committee Meeting:** 07/31/2019
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 criterion 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 must amend its continuous deferral policy to clarify that probation is not a possible action after an institution has been deferred past the timelines described in this criterion for non-compliance with its standards. Additionally, the agency must clarify its Appendix III.G. to state that the agency cannot exceed the timelines found in Appendix III.G. for an institution that continues to be non-compliant with any standard unless a good cause extension has been granted.

[\$602.20(a)]

Executive Summary

PART I: GENERAL INFORMATION ABOUT THE AGENCY

The National Association of Schools of Theatre (NAST) Commission on Accreditation accredits freestanding institutions of theatre and theatre-related programs (both degree and non-degree granting), including those offered via distance education. The Secretary's recognition of the agency's accreditation of freestanding institutions that offer theatre and theatre-related programs enables those institutions to establish eligibility to receive Federal student assistance funding under Title IV of the Higher Education Act of 1965, as amended (Title IV).

Recognition History

The NAST Commission on Accreditation was granted initial recognition in 1982 and has been periodically reviewed for renewal of recognition since that time. The agency's most recent petition for recognition was received in 2014 and recognition was renewed until 2019. The agency submitted a petition for renewal of recognition for the July, 2019 NACIQI meeting, and that petition is the subject of this analysis.

PART II: SUMMARY OF FINDINGS

602.20 Enforcement of standards

ears in length.

The agency describes its deferral policy, which appears to be applied in several ways. As discussed in exhibit 144 (in the agency's policy for continued deferrals) the document reads, "in the accreditation process, the Commission finds a situation in which an institution cannot be given initial accreditation or renewal of accreditation on the basis of evidence presented. This may be because the institution already does not meet the standards as outlined in the NAST Handbook, or because the institution does not appear to meet the standards as outlined in the NAST Handbook, or because sufficient information has not been provided". This language is problematic and would seem to indicate the agency is deferring action on a known and acknowledge noncompliant issue, with no public notification. It is unclear as to whether the agency's policy on deferrals actually allows a known and acknowledged noncompliant issue to exist, with no action, no public notification, and possibly exceed the enforcement

timelines allowed by this criterion. The agency's policy also provides for the option to place an institution on probation after the second consecutive deferral, which is also a concern. It is also unclear as to when the agency starts the clock initiating the enforcement timelines required by this criterion relative to its deferral policies.

In addition, the Guidelines for interpreting the continuous deferral policy (Exhibit 57 Appendix III.G.) stipulates that, "normally" the total time for demonstrating compliance shall not exceed the timeframes in this section of the Secretary's criteria. This statement makes the agency's policy noncompliant.

It is not clear why the agency would defer action in circumstances when it has found an institution out of compliance with one or more of its standards. In accordance with the Secretary's Criteria for Recognition, an agency is required to take immediate adverse action, or give the institution a specific timeframe for coming into compliance. The agency must amend its policy to state that the enforcement timelines required by this criterion will not be exceeded. As discussed previously, the agency's current policy states that normally the timelines will not be exceeded. The agency must also ensure that when it is determined that an institution is noncompliant the required timelines are initiated. The agency cannot defer action when it has determined that an institution is noncompliant with its standards. This must be reflected in the agency's policy and procedures.

Analyst Remarks to Response:

In response to the draft staff analysis, the agency's narrative stated that "Deferral" is defined by the agency as an action taken by the Commission which indicates that at least one issue of apparent non-compliance exists. The agency also stated that should the institution exceed the provisions of either the continuous deferral policy or the Appendix III.G., a negative action will result. However, currently the continuous deferral policy allows probation as a possible action after two deferrals, and probation is not a negative action. The agency's narrative states that the timelines cannot be exceeded, but the agency has separately stated that deferral periods are always one year for this agency, since the commission meets yearly. Therefore, allowing probation after a second consecutive deferral will exceed the timelines allowed in Appendix III.G., bringing these two policies into conflict with one another. If an institution has not demonstrated full compliance with the standards after two consecutive deferrals, or after the end of the timelines described in Appendix III.G., whichever happens earlier, the agency's policies must require either a negative action or an extension for good cause. Currently, the continuous deferral policy allows probation in that circumstance. The agency also stated that the qualifying language found in the NAST handbook (which states that "normally" an institution is required to follow the timelines found in Appendix III.G.) is included to refer to situations where the timelines are extended for good cause. However, the wording of this policy does not clearly state that the only exception to the timelines described in Appendix III.G. would be in cases of a good cause extension. The agency must amend its continuous deferral policy to clarify that probation is not a possible action after an institution has been deferred past the timelines described in this criterion for non-compliance with its standards. Additionally, the agency must clarify its Appendix III.G. to state that the agency cannot exceed the timelines found in Appendix III.G. for an institution that continues to be non-compliant with any standard unless a good cause extension has been granted.

PART III: THIRD PARTY COMMENTS

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