November 8, 2019

Karen P. Moynahan, Executive Director
National Association of Schools of Dance,
Commission on Accreditation
11250 Roger Bacon Drive, Suite 21
Reston, Virginia 20190

Dear Ms. Moynahan:

I am writing to inform you of my decision on the renewal of recognition of the National Association of Schools of Dance, Commission on Accreditation (NASD). U.S. Department of Education (Department) staff and the National Advisory Committee on Institutional Quality and Integrity (NACIQI) have each made recommendations to me. These recommendations were made under Sections 114 and 496 of the Higher Education Act of 1965, as amended, and pursuant to relevant statutory and regulatory provisions.

Both the Department staff and the NACIQI recommended that I continue NASD’s recognition as a nationally recognized accrediting agency at this time, require the agency to come into compliance within 12 months, and to submit a compliance report 30 days after that 12 month period that demonstrates the agency’s compliance with the issues identified in the staff analysis. Staff found, and the NACIQI agreed, that NASD failed to meet the requirements related to enforcement of the agency’s standards in 34 C.F.R. § 602.20(a). Specifically, staff were concerned with NASD’s deferral policy and guidelines. “The commission’s practice of its deferral policy allows a noncompliant issue to exist and exceed the enforcement timelines allowed by the Secretary’s enforcement of standards criteria, 602.20(a). In accordance with the Secretary’s criteria for recognition, an agency is required to take immediate action or give the institution a specific time frame for coming into compliance.” NACIQI Mtg. Transcr. 186:4-13 (July 31, 2019)

While I ordinarily would have accepted their recommendation to require a compliance report within 12 months to demonstrate that the agency has come into compliance with this standard, given that the new Accreditation and State Authorization regulations will change this standard, it seems inappropriate to require the agency to take actions and write compliance reports on a standard that is being eliminated. We urge the agency to be clear with its member institutions regarding the timeline for coming into compliance, but we realize that over the next year, the agency will likely update its policies to comply with the new regulations.
Therefore, I will not require the agency to submit the compliance report recommended by the staff and NACIQI. Instead, I will require the agency to submit to the Department by July 1, 2021 a copy of its policy regarding the timeline for coming into compliance under the Accreditation and State Authorization regulations that will go into effect on July 1, 2020.

I acknowledge the concerns of Department staff, but as a result of my conclusions, I am renewing NASD’s recognition without requiring further compliance actions at this time. Accordingly, I grant renewed recognition to NASD for a period of five years with the agency submitting a copy of its policy regarding their compliance timeline under the new Accreditation and State Authorization regulations by July 1, 2021.

Scope of recognition: the accreditation throughout the United States of freestanding institutions that offer dance and dance-related programs (both degree and non-degree-granting), including those offered via distance education.

I want to commend NASD for their efforts to develop rigorous student achievement measures that remain true to the purpose of dance education and recognize the role of qualitative measures in evaluating student achievement. Please convey my best wishes to the members of NASD. We do appreciate the work that NASD does to improve the quality and success of U.S. postsecondary education.

Sincerely,

Diane Auer Jones
Principal Deputy Under Secretary
Delegated to Perform the Duties of Under Secretary
U.S. Department of Education