

<b>Name:</b> National Association Of Schools Of Theatre, Commission on Accreditation	<b>Meeting Date:</b> 07/31/2019	<b>Response Submit Date:</b> 05/31/2019	<b>Status:</b> Final Review	<b>Type:</b> Renewal Petition
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**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
2. **Action Item:** Renewal Petition
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:** July 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**

**602.16(a)(1)(iii) Faculty**

**(a)(1)(iii) Faculty.**

The agency provided its Handbook to document faculty standards, which include requirements regarding student/staff ratio, faculty qualifications, faculty course load, and faculty involvement in the development of the artistic program for the institution. The agency documented implementation of these standards through two self-study reports and site visit reports, which detail information about faculty involvement at each institution and document how each institution meets the agency's standards in this area.

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self-study and the team report are actually for the same institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

Furthermore, the site visit reports do not indicate the role of each member. The Department is unable to determine the composition of each team, therefore the agency has not demonstrated that it includes an academic and an administrator representative. For each submitted site visit report, the agency must identify the roles of each site team member for each institution.

Note: FOIA Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." OGC has determined that the institution of higher education is not an individual, so this FOIA exemption does not apply to the names of institutions.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for members of the commission on accreditation, the board of directors, and the two public members who serve on both. The agency also provided via email the attached document below, which includes additional resumes for the Board of Directors. The resumes reflect appropriate qualifications for the agency roles.

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**602.16(a)(1)(v) Fiscal/Administrative Capacity**

**(a)(1)(v) Fiscal and administrative capacity as appropriate to the specified scale of operations.**

The agency's Handbook includes standards related to the fiscal and administrative capacity of institutions. The agency's standards include requirements related to the adequacy of financial resources and longevity of financial support and budget allocations from year to year. NAST requires each institution to publish all regulations and policies related to tuition, fees, and other charges, and to develop a tuition refund policy that is equitable to both the institution and the student. NAST documented its standards related to the maintenance of financial records and accounting practices, including requirements regarding the frequency of audits. The agency provided two comprehensive dossiers to document self-studies and site visit reports reviewing each theatre unit in this area, and the agency's procedures for a site visit report, including audit information and documentation of review of fiscal information.

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self-study and the team report are actually for the same institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

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**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided redacted resumes for its two public members, who serve on both the Board of Directors and the Commission on Accreditation. The presence of these public members results in the agency having at least one public member for each seven members of the Board or Commission.

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## **602.16(a)(1)(vi) Student Support Services**

### **(a)(1)(vi) Student support services.**

The agency listed several areas in which its standards address student services. The agency provided a self-study template, which asks institutions to address advisement of students in the areas of program content, program completion, careers or future studies, and theatre-specific student services associated with individual students' programs. In addition to advisement, the agency's standards require that an institution seek out student views and judgments in those matters in which students have a direct and reasonable interest. The agency's standards require that institutions must provide student services consistent with their mission, goals, and objectives. The agency requires that student services be organized and managed by individuals with appropriate training, experience, and abilities, that all types of services shall be available to students, and that the institutions must provide an orientation program that acquaints incoming students with student services. The standards require that institutions provide or facilitate access to education and counseling, to include personal, social, vocational and financial issues and the professional care associated with the maintenance of physical and mental health.

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self-study and the team report are actually for the same institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

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Note: FOIA Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." OGC has determined that the institution of higher education is not an individual, so this FOIA exemption does not apply to the names of institutions.

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

In response to the draft staff analysis, the agency provided recent signed conflict of interest statements from a selection of visiting evaluators as well as all NAST agency staff, the members of the Board of Directors, and the members of the Commission on Accreditation.

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## **602.16(a)(1)(viii) Program Length**

### **(a)(1)(viii) Measures of program length and the objectives of the degrees or credentials offered.**

The agency provided documentation of its standards in this area, with standards addressing several issues around credit hours, including matching credit hour requirements to program length and type, publication of information around credit hour requirements, and requirements related to transfer of credit. The agency provided documents to demonstrate review of two institutions in this area; however, due to heavy redactions, it was not possible to determine if these documents showed implementation of the agency's policies under this criterion.

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self-study and the team report are actually for the same institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

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Note: FOIA Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and

similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." OGC has determined that the institution of higher education is not an individual, so this FOIA exemption does not apply to the names of institutions.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency referred to the required competencies established for each type of theatre program as established in the NAST handbook. The agency described the continuous feedback mechanisms required for theatre and noted that the agency requires implementation of in-depth and multi-faceted evaluation mechanisms. The agency noted that institutional evaluations require evaluators to review student performance and the quality of student work in each area or major.

Additionally, the agency provided the resumes of visiting evaluators for both of the institutions for which a full-cycle of documentation was provided, demonstrating expertise in both administrative and academic areas present on each evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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**602.16(a)(1)(x) Title IV Responsibilities**

**(a)(1)(x) Record of compliance with the institution's program responsibilities under Title IV of the Act, based on the most recent student loan default rate data provided by the Secretary, the results of financial or compliance audits, program reviews, and any other information that the Secretary may provide to the agency; and**

The agency provided evidence of its standards, policies and procedures in relation to Title IV program responsibilities for freestanding institutions of higher education, in addition to two sample dossiers including documentation of review of freestanding institutions in this area, and its supplemental annual report form, which is required for freestanding institutions. The agency's policies include that freestanding institutions must submit financial information annually to the agency, including tuition and fee schedules, a summary of the institution's involvement with Federal and state student loan and grant programs, and an annual audited financial statement, as well as additional information relevant to this criterion. '

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self- study and the team report are actually for the same institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

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Note: FOIA Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." OGC has determined that the institution of higher education is not an individual, so this FOIA exemption does not apply to the names of institutions.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team.

In response to the draft staff analysis, the agency referred to the required competencies established for each type of theatre program as established in the NAST handbook. The agency described the continuous feedback mechanisms required for theatre and noted that the agency requires implementation of in-depth and multi-faceted evaluation mechanisms. The agency noted that institutional evaluations require evaluators to review student performance and the quality of student work in each area or major.

Additionally, the agency provided the resumes of visiting evaluators for both of the institutions for which a full-cycle of documentation was provided, demonstrating expertise in both administrative and academic areas present on each evaluation team. The agency provided DAPIP ID numbers to identify institutions and demonstrate the documentation is related and regarding the same institution.

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**602.17(a) Mission & Objectives**

**(a) Evaluates whether an institution or program--**

- (1) Maintains clearly specified educational objectives that are consistent with its mission and appropriate in light of the degrees or certificates awarded;**
- (2) Is successful in achieving its stated objectives; and**
- (3) Maintains degree and certificate requirements that at least conform to commonly accepted standards;**

The agency provided its standards regarding institutional purpose statements, which include requirements as well as guidelines and recommendations. The standards in this area are categorized by degree level and require institutions or programs to have purpose statements that are appropriate to the level of education and their placement (if applicable) in a larger institution. The agency provided its manual for commission readers, which instructs readers to respect local purposes and achievements, with guidance for readers on how to respect institutional goals, objectives, and achievements. The agency also provided its Rules of Practice and Procedure, and its Procedures for the Self Study document, which demonstrates its process for collecting information about institutional mission as part of its accrediting activities. The full-cycle dossiers provided for two institutions provide some evidence of assessment by the agency in this area, with completed self-studies and site visit reports documenting review in this area. However, due to heavy redactions, it is not possible to determine if the site visits documented had the required composition for review. '

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self- study and the team report are actually for the same institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

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Note: FOIA Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." OGC has determined that the institution of higher education is not an individual, so this FOIA exemption does not apply to the names of institutions.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify institutions and demonstrate the documentation is related and regarding the same institution.

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**602.17(f) Report on Compliance & Student Achievement**

**(f) Provides the institution or program with a detailed written report that assesses--**

- (1) The institution's or program's compliance with the agency's standards, including areas needing improvement; and**
- (2) The institution's or program's performance with respect to student achievement; and**

The agency noted that during each full cycle review, each institution receives a site visit report and a commission decision letter, each of which comments upon the institution's compliance with agency standards and upon the institution's performance with respect to student achievement. The agency provided two dossiers documenting institutional self-studies, site visit reports, and commission decision letters showing communications with the institutions in these areas.

It is important to note that the agency's practice of redacting the name of the institution described in the petition narrative hinders staff analysis for agency compliance with the requirements of the section and prevents Department staff from conducting certain checks and comparisons during the analysis (such as determining if the self- study and the team report are actually for the same

institution or if the institution being evaluated is listed on the agency's accredited schools list). The agency must attempt to provide this needed information for a compliance determination. If the agency does not wish to include the name of the institution, it could use another identifier, such as the schools OPE ID

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Note: FOIA Exemption (b)(6) permits the government to withhold all information about individuals in "personnel and medical files and similar files" when the disclosure of such information "would constitute a clearly unwarranted invasion of personal privacy." OGC has determined that the institution of higher education is not an individual, so this FOIA exemption does not apply to the names of institutions.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution. These resumes demonstrate both academic and administrative experience on the evaluation team.

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**602.19(b) Monitoring**

**(b) The agency must demonstrate it has, and effectively applies, a set of monitoring and evaluation approaches that enables the agency to identify problems with an institution's or program's continued compliance with agency standards and that takes into account institutional or program strengths and stability. These approaches must include periodic reports, and collection and analysis of key data and indicators, identified by the agency, including, but not limited to, fiscal information and measures of student achievement, consistent with the provisions of §602.16(f). This provision does not require institutions or programs to provide annual reports on each specific accreditation criterion.**

The agency described several mechanisms used for monitoring institutions. The agency requires all institutions to submit a HEADS data survey, which includes information about enrollment and the characteristics of the faculty and student population at each institution, as well as graduation information. All institutions also submit a yearly Accreditation Audit and Affirmation Statement. Freestanding institutions are required to include a Supplemental Annual Report, which includes financial information, including a yearly audit, as well as information on graduate occupation in the field. Institutions must submit substantive change information as per the agency's policies.

Due to heavy redactions, it isn't clear that the monitoring documentation provided by the agency are from institutions within the scope of the agency's recognition. At least one of the submitted HEADS forms appears to be from an institution not within the agency's scope of recognition.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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**602.20(a) Enforcement Timelines**

**(a) If the agency's review of an institution or program under any standard indicates that the institution or program is not in compliance with that standard, the agency must--**

**(1) Immediately initiate adverse action against the institution or program; or**

**(2) Require the institution or program to take appropriate action to bring itself into compliance with the agency's standards within a time period that must not exceed--**

**(i) Twelve months, if the program, or the longest program offered by the institution, is less than one year in length;**

(ii) Eighteen months, if the program, or the longest program offered by the institution, is at least one year, but less than two years, in length; or

(iii) Two years, if the program, or the longest program offered by the institution, is at least two years 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 provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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#### **602.20(b) Enforcement Action**

**(b) If the institution or program does not bring itself into compliance within the specified period, the agency must take immediate adverse action unless the agency, for good cause, extends the period for achieving compliance.**

The agency described its policy for institutions that are not in compliance with agency standards. The agency's documentation and narrative indicated that typically, a decision is deferred for institutions that are found to be not in compliance with any standard, with each deferral consisting of one year, since the commission meets yearly. In the agency Handbook, section Appendix III.G. "Commission Time Guidelines for Interpreting the Continuous Deferral Policy" defines the agency's good cause policy and timelines.

The agency includes its policies for good cause, which include that an institution may receive at most two good cause extensions of one year each. Its handbook defines allowable reasons for extending good cause, though the agency notes that good cause extensions are rarely used.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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**602.22(a)(1) Approval of Substantive Changes**

**(a) If the agency accredits institutions, it must maintain adequate substantive change policies that ensure that any substantive change to the educational mission, program, or programs of an institution after the agency has accredited or preaccredited the institution does not adversely affect the capacity of the institution to continue to meet the agency's standards. The agency meets this requirement if--**

- (1) The agency requires the institution to obtain the agency's approval of the substantive change before the agency includes the change in the scope of accreditation or preaccreditation it previously granted to the institution; and**

The agency provided documentation of its standards in regard to substantive change. The agency requires an institution to obtain the agency's approval of a substantive change before the agency includes the change in the scope of accreditation or preaccreditation it previously granted to the institution, meeting the requirements of this guideline. The agency's Handbook defines which changes constitute a substantive change and the timeline for agency approval. The agency provided a sample institution's substantive change request from 2018, including the commission's actions in response to that request.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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**602.22(a)(2)(i-vii) Types of Substantive Change**

**(2)The agency's definition of substantive change includes at least the following types of change:**

- (i) Any change in the established mission or objectives of the institution.**
- (ii) Any change in the legal status, form of control, or ownership of the institution.**
- (iii) The addition of courses or programs that represent a significant departure from the existing offerings of educational programs, or method of delivery, from those that were offered when the agency last evaluated the institution.**
- (iv) The addition of programs of study at a degree or credential level different from that which is included in the institution's current accreditation or preaccreditation.**
- (v) A change from clock hours to credit hours.**
- (vi) A substantial increase in the number of clock or credit hours awarded for successful completion of a program.**
- (vii) If the agency's accreditation of an institution enables the institution to seek eligibility to participate in title IV, HEA programs, the entering into a contract under which an institution or organization not certified to participate in the title IV, HEA programs offers more than 25 percent of one or more of the accredited institution's educational programs.**

The agency's handbook includes policies under the "Rules of Practice and Procedure" that meet all the required elements of this element. The agency provided an institutional request for substantive change from 2018 and included commission actions taken to reflect implementation of agency policies in this area.

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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**602.23(a) Public Information**

**(a) The agency must maintain and make available to the public written materials describing--**

- (1) Each type of accreditation and preaccreditation it grants;**
- (2) The procedures that institutions or programs must follow in applying for accreditation or preaccreditation;**
- (3) The standards and procedures it uses to determine whether to grant, reaffirm, reinstate, restrict, deny, revoke, terminate, or take any other action related to each type of accreditation and preaccreditation that the agency grants;**
- (4) The institutions and programs that the agency currently accredits or preaccredits and, for each institution and program, the year the agency will next review or reconsider it for accreditation or preaccreditation; and**
- (5) The names, academic and professional qualifications, and relevant employment and organizational affiliations of--**
  - (i) The members of the agency's policy and decision-making bodies; and**
  - (ii) The agency's principal administrative staff.**

The agency's website states:

"NAST is recognized by the U.S. Secretary of Education as the institutional and specialized accrediting body for the field of theatre. This recognition enables NAST to function as a gatekeeper for the purpose of Title IV funding eligibility for independent schools of theatre not otherwise institutionally accredited."

The agency's scope of recognition by the Secretary must be presented accurately on the website. The agency's current scope of recognition is:

"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."

**Analyst Remarks to Response:**

In response to the draft staff analysis, the agency provided resumes for the evaluation teams for the two sets of institutional review documents submitted. These resumes demonstrate both academic and administrative experience on the evaluation team. The agency provided DAPIP ID and OPE ID numbers to identify the documentation used for the full cycle review and the evaluators in order to demonstrate that the documentation is related and regarding the same institution.

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**Part III: Third Party Comments**

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

