

The Accrediting Commission of Career Schools and Colleges (ACCSC) appreciates the opportunity to provide written comments on the proposed revision of the **2010 CHEA Recognition Policy and Procedures**. In particular, ACCSC's comments will focus on lines 230 to 231 of the proposal which requires "a majority of institutions or programs the organization accredits is at the associate level or higher" in order for an agency to be eligible to apply for CHEA Recognition.

This is not the first time that ACCSC has questioned the rationale and purpose of CHEA's eligibility criteria. Over the years perhaps ACCSC missed an opportunity to underscore the lasting damage that CHEA's eligibility criteria cause to tens of thousands¹ of students who enrolled in degree programs at an institution accredited by ACCSC. In addition, the impact of CHEA's eligibility criteria limits growth and other opportunities for ACCSC-accredited degree-granting institutions, stifles workforce development in the United States, fails to envisage the changing nature of "higher education," and damages ACCSC's reputation in the United States and abroad.

ACCSC has been continuously recognized by the United States Department of Education for over 50 years and currently serves as the designated institutional accrediting body for 705 postsecondary, career, technical and vocational institutions – 329 of which are degree-granting institutions within its membership of 705 (47%). ACCSC has decades of experience accrediting degree granting institutions at the associate, bachelor, and master degree levels, with over 65,000² students currently enrolled in a degree program at an ACCSC-accredited institution. ACCSC-accredited institutions currently offer 1,381 associate degree programs, 409 bachelor degree programs, and 95 master's degree programs. However, because ACCSC accredits 329 and not 353 degree-granting institutions,³ ACCSC is not CHEA eligible.

Under the current proposal, CHEA would continue its long-standing practice to restrict recognition eligibility to only those agencies where "a majority of institutions or programs the organization accredits is at the associate level or higher⁴." As a result, because only 47% of the ACCSC membership is degree granting, ACCSC continues to be ineligible to even apply for CHEA recognition. ACCSC struggles to understand what CHEA hopes to achieve by continuing to limit its definition of "higher education" in the face of historic changes in the ways that institutions of higher education see themselves and serve students. There is a steady drum-beat for accreditors to advance innovation, embrace new models, and explore partnerships with alternative providers. CHEA itself has recognized the need for disruption⁵ in the higher education accreditation model, yet has chosen to cling to an anachronistic notion of what higher education means. In fact, CHEA's February 26, 2018 article, "How Disruption Can Contribute to the Future Success of Accreditation," recognizes the crucial role that ACCSC has played in this regard noting, "[w]e can benefit from the emphasis on accountability that characterizes the standards of the Accrediting Commission of Career School and Colleges, demonstrating that longstanding accrediting organizations can indeed engage disruption."

¹ According to ACCSC's 2016 Annual Report, 65,866 students were enrolled in a degree program at an ACCSC accredited institution in fiscal-year 2016.

² As of July 1, 2018

³ In order to achieve a "degree majority" with a membership of 705 institutions.

⁴ Lines 230-231

⁵ <https://www.chea.org/how-disruption-can-contribute-future-success-accreditation>

Below is a summary of the reasons why ACCSC believes CHEA should revise its recognition criteria to be more inclusive:

I. Impact on Students

Most critically, CHEA's proposal is unfair to students. CHEA recognition conveys implied academic quality for an institution throughout the higher education community. Thus, CHEA's policies against agencies like ACCSC have deep and lasting impact on the lives of students. In many cases, when a college, university, or other such postsecondary institution makes admissions and transfer of credit determinations, a part of the initial analysis relies upon whether or not a student's previous institution was accredited by an accrediting agency recognized by CHEA. This is also the case for licensing boards, governmental agencies, and employers.

For decades, ACCSC has written letters to the types of entities listed above advocating on behalf of students whose admissions or credits have been denied and employment opportunities stymied for no reason other than a lack of CHEA recognition. Although ACCSC continues its efforts to help students, this has proven to be a fruitless exercise. Students consistently contact ACCSC expressing their anger and frustration. Students demand answers and are often inconsolable, fearing that they have wasted time and money.

CHEA's own *Statement to the Community: Transfer and the Public Interest*⁶ recognizes the enormity that recognition on transfer of credit decisions play in the lives of students. Specifically, CHEA's *Statement* underscores its belief that receiving institutions ought to make clear their reasons for accepting or not accepting credits that students seek to transfer and that students should have "**reasonable explanations**" about how work offered for credit is or is not of sufficient quality when compared with the receiving institution's curricula and standards to meet degree requirements of the receiving institution. But the practical reality is, without CHEA recognition, students do not even get the courtesy of any institutional analysis into the appropriateness of the credits earned. The answer they get is simply "no."

So what is a student to do? The likely course of action is affected students take out additional loans to pay for courses that they have already successfully completed and carry forward the burden of that unnecessary and often crippling debt. In other cases, students simply cannot enroll in an undergraduate program, gain admission to graduate school, or obtain satisfactory employment. This means that for students, CHEA recognition carries an extremely high amount of weight and therefore CHEA's policies in this regard have deep impact and should be considered with care.

II. Impact on ACCSC-Accredited Institutions

CHEA's eligibility criterion is harmful to ACCSC-accredited institutions because it unnecessarily impacts workforce development opportunities. In just one example, the Education Assistance Program

⁶ http://www.accsc.org/UploadedDocuments/transfer_state_02.pdf

administered by the International Association of Machinists & Aerospace Workers and Boeing⁷ offers tuition reimbursement for degree programs as well as vocational and certification programs, as long as the schools are approved by CHEA.⁸ This has a material impact on the 35 ACCSC-accredited institutions offering an Aviation Airframe & Powerplant or Aviation Maintenance Technology program, taught by fully Federal Aviation Administration Certified Airframe and Powerplant Mechanics that have years of practical experience maintaining a long list of highly complex aircraft. In fact, in 2017 alone, ACCSC accredited institutions trained over 4,600 students in these types of critical aviation infrastructure programs and have the exact experience organizations like Boeing need to meet future workforce demands. The travesty here is that the Educational Assistance Program includes certificate programs for eligibility, but CHEA recognition demands degree emphasis for the accrediting body to be recognized. Given that, beyond the lasting damage of CHEA's proposal on students and schools, ACCSC is also concerned about the future of higher education, particularly when there continues to be an ideology advanced by the national voice for accreditation to government and the public that legitimate higher education is limited to only those institutions that confer degrees and only to their graduates.

III. Impact on ACCSC

CHEA's proposal to continue to exclude agencies like ACCSC is not aligned with the rest of the higher education community. In 2017 to 2018 alone, the House Committee on Education and the Workforce relied upon ACCSC's accreditation experiences to inform the full-committee at the "Strengthening Accreditation to Better Protect Students and Taxpayers" hearing⁹, and the National Advisory Committee on Institutional Quality and Integrity¹⁰ invited ACCSC to participate on the Panel on Outcomes Measures at its February 2017 meeting.¹¹ ACCSC has been asked to participate in several projects and convenings of the higher education community including: The Lumina Foundation,¹² State Higher Education Executive Officers,¹³ National Association of State Administrators and Supervisors of Private Schools,¹⁴ Higher Learning Advocates,¹⁵ Ithaka,¹⁶ Credential Engine,¹⁷ and others. That ACCSC has significant voice in the higher education community yet cannot apply for eligibility from CHEA because in CHEA's eyes ACCSC's membership in not representative of higher education is confounding.

Moreover, ACCSC has maintained continuous recognition from the United States Department of Education for 50 years, the last 10 years with no findings of non-compliance, and in 2016 became part of

⁷ <http://www.iam-boeing.com/docs/education-assist/EA-Guidelines.pdf>

⁸ *Criteria 5.1.1, Eligible Education and Training Providers*

⁹ <https://edworkforce.house.gov/calendar/eventsingle.aspx?EventID=401569>

¹⁰ Authorized and reconstituted by the Higher Education Opportunity Act of 2008 to provide recommendations regarding accrediting agencies that monitor the academic quality of postsecondary institutions and educational programs for federal purposes, as well as degree approvals to Congress for military educational institutions; <https://sites.ed.gov/naciqi/>

¹¹ <https://sites.ed.gov/naciqi/files/2017/02/NACIQI-Presentation-ACCSC.pptx>

¹² <https://www.luminafoundation.org/>

¹³ SHEEO serves as the national association of the chief executive statewide governing, policy, and coordinating boards of postsecondary education (<http://www.sheeo.org>).

¹⁴ NASASPS' mission is improve and promote effective state regulation of private postsecondary education. NASASPS regular membership includes state boards, commissions, agencies or departments that are engaged in the administration, regulation, or supervision of private schools, colleges, or universities. <https://nasasps.org/about-us/about-nasasps/>

¹⁵ Necessity to Invention: Beyond the "Toggle Switch" Approach to Accreditation (<https://bit.ly/2zO1ed1>).

¹⁶ <https://www.ithaka.org/>

¹⁷ <https://www.credentialengine.org/>

the International Network for Quality Assurance Agencies in Higher Education.¹⁸ Despite ACCSC's reputation nationally, the lack of CHEA recognition has consistently interfered with ACCSC's ability to conduct business with international educational providers. Several ministries of education in countries outside of the United States look to CHEA recognition as a way to determine the legitimacy of an accrediting agency. ACCSC's inability to even apply for CHEA recognition has often proved to be an insurmountable impediment for several institutions' otherwise willingness to move forward with ACCSC accreditation. In 2017 and 2018 alone, the lack of CHEA recognition has impacted ACCSC's international accreditation endeavors with institutions in Denmark, Italy, Peru, Turkey, and Saudi Arabia, thus limiting ACCSC's ability to grow into international markets. These schools consistently inform ACCSC that without CHEA recognition, it is difficult for them to move forward with any accreditation initiative because ACCSC is not seen as being legitimate.

IV. Impact on Innovation

For many decades we have bowed at the altar of degrees staying faithful to the orthodoxy of the status quo. But, a reformation is afoot. In the current higher education landscape, more institutions, employers, and higher education organizations are examining the value of non-degree programs. These include certificates, badges, micro-credentials to name but a few, and there is a strong call to find ways to instill trust in the quality of these credentials (e.g., Credential Engine, Quality Commons, Lumina Foundation, etc.). That CHEA is still holding firm to the idea that majority degree granting institutions represent the hallmark of "higher education" is inconsistent with the march toward innovation and reform.

Next Steps

Since CHEA's goal is to be a national advocate and institutional voice for the self-regulation of academic quality through accreditation, CHEA has a chance to embrace the entire universe of "higher education" and to serve as a true national voice on the important role that all accrediting agencies serve. And by doing so, CHEA will not only increase opportunities for students, but will strengthen the overall accreditation enterprise in the eyes of critics, skeptics, policy makers and the public.

From ACCSC's perspective, the best chance to ensure the integrity and sustainability of accreditation is to include all accreditors under one roof. By doing so, CHEA would be in a stronger position to lead the conversation for the entire accreditation community; showcase how accreditors have embraced innovation and are improving access; better demonstrate how accreditors provide a meaningful service to the public, and better demonstrate that accreditation is an effective gate-keeper to federal student financial-aid funding. As such may be the case, ACCSC requests that CHEA consider and adopt the following suggested revision:

An accrediting agency is eligible to apply for CHEA Recognition ~~is available~~ only if a majority of institutions or programs the ~~organization~~ agency accredits ~~grants post-secondary credentials grant degrees at the associate level or above~~. The CHEA-recognized scope of accreditation also

¹⁸A world-wide association of near 300 organizations active in the theory and practice of quality assurance in higher education (<http://www.inqaah.org>).

may or may not include additional offerings such as internships, clinical training and post-doctoral work. However, such offerings are not counted when determining whether the accrediting organization meets the post-secondary credential-granting requirements.

On behalf of the 150,000 plus students attending over 700 ACCSC-accredited institutions, the Accrediting Commission appreciates CHEA's consideration of these comments.

Respectfully,

The Accrediting Commission of Career Schools and Colleges (ACCSC)