

# CALL FOR Comment

To: ACCSC-Accredited Institutions and Other Interested Parties  
From: Michale S. McComis, Ed.D., Executive Director  
Date: June 3, 2021  
Subject: Call for Comment

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The Accrediting Commission of Career Schools and Colleges (ACCSC) presents the following topics for comment by the membership and other interested parties:

- **Student Recruitment – Section IV (A), Substantive Standards, Standards of Accreditation**
- **Advertising – Section IV (B), Substantive Standards, Standards of Accreditation**

The Accrediting Commission of Career Schools and Colleges (ACCSC) welcomes and encourages the comments of its accredited institutions and other interested parties on the topics listed above. The Commission encourages all member institutions and interested parties to read carefully the Commission's request for feedback and to submit comments and recommendations for consideration by the Commission. The Commission will give careful consideration to the comments received, particularly those that reflect thoughtful insights which take into account what is best for the entire ACCSC membership and support and enhance ACCSC's mission.

With regard to the proposed revisions, after considering the written comments, the Commission may adopt the revision as proposed, adopt the revision with additional changes, defer action for further study and consideration, or reject the proposed revision. If the Commission adopts the revisions, ACCSC will establish an effective date allowing reasonable time for institutions to come into compliance and will announce the revision via an *Accreditation Alert*.

All Comments are to be in the form of a PDF document on letterhead with the signature of the commenter. Please send all written comments to the attention of Michale S. McComis, Ed.D., Executive Director, via e-mail to [mccomis@accsc.org](mailto:mccomis@accsc.org). Written comments are due by **June 16, 2021**.<sup>1</sup>

For assistance or additional information regarding this Call for Comment, please contact Michale S. McComis, Ed.D., Executive Director, at 703.247.4520 or [mccomis@accsc.org](mailto:mccomis@accsc.org).

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<sup>1</sup> Although the Commission generally allows for 30 days for interested parties to comment, ACCSC is in this case asking for comments to be submitted in a shorter timeframe in order to allow these potential changes to be included in the July 1, 2021 edition of the *Standards of Accreditation*. If any member school objects to the shorter timeframe, then the timeframe will be extended to 30 days and the revisions will not be included in the July 1, 2021 edition of the *Standards of Accreditation*.

The Commission has been considering how the use of social media has raised questions from schools, evaluations teams, and in the accreditation process with regard to ACCSC’s advertising standards. Specifically, with more schools incorporating digital platforms both for instructional and advertising purposes, there has been an increase in inquiries from schools related to advertising on social media platforms as well as an increase in citations. Currently, when these inquiries are received, schools are advised to forego engaging on any platform (i.e., “share” repost, “like,” retweet) used by current students and to secure written consent for any endorsement provided by a student, regardless of platform. The Commission has attempted to develop a path forward that honors the student-centered nature of the existing standards while also removing some potential barriers for member schools to use social media for both promotional and community building purposes.

As part of this initiative, the Commission had ACCSC staff engage a focus group to provide information and context with regard to how member schools currently incorporate Social Media platforms into advertising. The focus group was comprised of individuals from eight (8) ACCSC-member schools which met in January and February 2021. Working with the focus group and the Standards Committee, the Commission has:

- Included a definition of an endorsement;
- Addressed the use images; and
- Set forth clear guidelines for the use of publicly shared media.

The Commission has also learned of several instances where schools have expressed interest in using “student ambassadors” in the admissions process. The Commission appreciates the importance of school community building and sharing actual student experience as a part of the admissions process. However, the Commission is mindful of the important separation and distinction that students are not recruiters. As such, the Commission has revised the language of the standards to allow an appropriate use of “student ambassadors” for its positive attributes while also setting forth expectations and limitations in this regard.

Based on the work conducted by the Standards Committee, the full Commission, and the feedback from the focus group, the Commission recommends the following revisions to the *Standards of Accreditation*.

New text in **Red, Bold, and Italic** print and deleted text is ~~blue strikethrough~~.

## SECTION IV – STUDENT RECRUITMENT, ADVERTISING, AND DISCLOSURES

### A. Recruitment

3. A school only uses its own employees to conduct student recruiting activities and is prohibited from engaging employment agencies to recruit prospective students. Schools under common ownership may employ a single recruiter. **Currently enrolled and former students may serve as “student ambassador” volunteers to share their experience and to help answer questions that prospective students may have about the school and its programs. Currently enrolled and former students engaged in these type of ambassador activities may not engage in other recruitment or admissions processes and must sign a statement indicating they have participated of their own volition and have not received financial compensation or academic benefit<sup>1</sup> from the school for such participation.<sup>2</sup>**

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<sup>1</sup> De minimis amounts provided in forms such as a school bookstore credit or gift card, for example, would not be considered “financial compensation.” Academic benefit refers to practices such as awarding credit toward an assignment or grade, granting preferred scheduling or special in-school privileges, etc.

<sup>2</sup> Recruitment standards are expected to be followed by student ambassadors, as applicable. Current student participation as a student ambassador is not subject to the prohibitions in Section IV (B)(4) Substantive Standards.

## B. Advertising, Promotion, Statements, and Claims

### 4. *Endorsements, Images, and Publicly Shared Media:*

- a. *Endorsements: An endorsement means written and verbal statements given by an individual giving explicit approval or support for the school, its programs, or outcomes.* A school may only use endorsements in school catalogs, literature, or advertising with the written consent of the authors, ~~which is kept on file and subject to inspection.~~ Any ~~such~~ endorsement ~~is to~~ **must** be a bona fide expression of the author's opinions, strictly factual, and a portrayal of currently correct conditions or facts. ~~Under no circumstances may~~ **A school may not use endorsements from** currently enrolled students **in promotional activities or advertising** ~~provide endorsements on behalf of a school.~~
- b. *Images: A school may only use student images in school catalogs, literature, or advertising with the written consent of the subjects.*
- c. *Publicly Shared Media: A school may use/share an individual's publically shared media (e.g., social media) regarding the school so long as the media originated with the individual and is bona fide, factually and contextually accurate, unadulterated, and a faithful representation of the shared information or images. Schools may not compensate or provide any or other consideration for such use and the school is responsible for compliance with all advertising standards in such use.*