PUBLI C COMMENT DISCLOSURE FORM

To Be Submitted No Later Than July 30, 2021

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

RE: Divers Academy International
1500 Liberty Place
Erial, New Jersey 08081

I understand and agree that the Commission, pursuant to Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation, will make public the reasons for the decision together with any comments submitted by the school.

I understand and agree that the school is not obligated to submit public comments and acknowledge that the attached comments are provided voluntarily.

I understand and agree that the attached comments constitute Divers Academy International’s public comments on the adverse accreditation action and will be disseminated with the public notice of the Commission’s decision including, but not limited to, posting to the ACCSC website (Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation).

I understand and agree that the school’s public comments must be in summary format and limited to two type written pages. I acknowledge that any comments which do not meet these requirements will not be disseminated or posted along with the summary of the reasons for the adverse accreditation decision.

I understand and agree that the Commission will release the adverse accreditation decision to the public pursuant to Section X (D)(3), Rules of Process and Procedure, Standards of Accreditation and that the school’s written comments will not be added to this disclosure if this form and the comments are not submitted in the required format on or before July 30, 2021.

I understand and agree that the Commission has no responsibility for how the school’s comments may be used once put into the public domain.

Signature:  
Tamara Brown, President

Date: 7/29/21
Name/Title
July 30, 2021

Dr. Michale S. McComis
Executive Director
Accrediting Commission of Career Schools and Colleges
2101 Wilson Boulevard, Suite 302
Arlington, VA 22201

RE: Divers Academy International Official Comment

Dear Dr. McComis,

This letter serves as Divers Academy International's (Academy) official comment to the July 20, 2021 action from the Accrediting Commission of Career Schools and Colleges (ACCSC) withdrawing accreditation.

The Academy and I wish to offer our sincere appreciation to you, the Commission, and staff for its guidance from the outset of our affiliation and initial grant of accreditation awarded in 1977. The ACCSC Standards of Accreditation provided a solid foundation for continuous improvement throughout our forty-plus-year history.

We also appreciate that the Commission, at its February 2021 meeting, determined that the Academy "made a clear and convincing showing of good cause" for consideration of a change of control. Sadly, while every effort was made to comply with that directive, our attempts were impacted by the unprecedented and severe effects of COVID-19 on postsecondary education.

We also thank the Commission for approving our proposed teach-out plan and agreement with a qualified, accredited institution, having determined that they "provide for the equitable treatment of students and a reasonable opportunity for students to complete their education." Still, we acknowledge that, despite substantial efforts made by the Academy and its owner to bring about a change of ownership, the regulatory processes requisite for change of control and ownership were not completed in their entirety within the period specified by the Commission.

Although we fell short of the Standards of Accreditation, we did many things right. Most importantly, we have stood by our students throughout the process. Students have been permitted to complete their program at our institution without any additional cost. All students enrolled since the August 31, 2020 probation order, including 32 remaining students, have finished or can finish their education uninterrupted and graduate from an accredited program.

Student learning outcomes in the past few years demonstrate that the Academy has served its students well:

<table>
<thead>
<tr>
<th>Completion Rates</th>
<th>Independently Verified Placement Rates</th>
<th>Default Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>2020: 89%</td>
<td>2020: 92%</td>
<td>FY 2017: 6.4</td>
</tr>
<tr>
<td>2019: 95%</td>
<td>2019: 90%</td>
<td>FY 2016: 4.4</td>
</tr>
<tr>
<td>2018: 89%</td>
<td>2018: 80%</td>
<td>FY 2015: 5.0</td>
</tr>
</tbody>
</table>

The Academy's importance as a commercial diving school has been well documented. The 40-plus-year-old family-run institution is one of less than ten total private commercial diving schools in the country, was
one of the pioneers in developing commercial diving standards which became accredited by the American National Standards Institute (ANSI), and is widely recognized as one of the foremost knowledgeable educators on commercial diving. Its role in this highly specialized postsecondary community is greatly needed and will be sorely missed.

We also appreciate ACCSC's invitation to reapply for accreditation in accordance with Section VII (N)(3), Rules of Process and Procedure, Standards of Accreditation, and again demonstrate compliance with the Standards of Accreditation.

Because we are fortunate to have resources to remain staffed while we consider the institution's future, we remain operational for students, graduates, and parents to obtain records, services, and other requests. Our students' needs will always come first, and it is, indeed, our belief that this experience has strengthened us in the long term.

Best Regards,

Tamara Brown