

CALL FOR Comment

To: ACCSC-Accredited Institutions and Other Interested Parties
From: Michale S. McComis, Ed.D., Executive Director
Date: March 28, 2025
Subject: Call for Comment

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

- **Consortium/Partnerships and Separate Facilities**
- **Management and Administrative Training**
- **Recruitment**
- **Student Satisfaction**
- **Accreditation and Approval Disclosures**
- **Use of a Diminutive Name (Nickname)**
- **Consultants**

The Commission welcomes and encourages the comments of ACCSC-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 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 revision, ACCSC will establish an effective date allowing reasonable time for institutions to come into compliance and will announce the revision via an *Accreditation Alert*.

Written comments regarding the topics included in this *Call for Comment* are to be in the form of a PDF document and are due by **April 28, 2025**. Please send all written comments to the attention of Michale S. McComis, Ed.D., Executive Director, via e-mail to mccomis@accsc.org.

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.

Consortium/Partnerships and Separate Facilities

ACCSC continues to receive inquiries related to facilities and program/course delivery options. In reviewing these proposals, the Commission has sought to find common-sense solutions to some of the self-imposed limitations that ACCSC's current *Rules* and *Standards* may present. Of note, the current design and definitions date back to 1999 and while there have been several tweaks and adjustments since then, the overriding principles remain largely intact.

Thus, the Commission turned to its consortium and partnership agreement standards to serve as another category for instances where a school can partner with another entity to offer a portion of an approved program. The proposed revisions are summarized below.

- Placing a greater reliance on consortium and partnership agreements particularly with employers (e.g., hospitals, labs, community colleges, apprentice sites) as a means to remove barriers to innovation;
- As is already required, a school must notify and have approved any consortium, partnership, or contractual agreements with other schools or training providers in advance of such contracts taking effect (see *Section II (A)(8), Substantive Standards, Standards of Accreditation*);
- Under the proposed language, a consortium agreement could cover instances where, for example, a school utilizes a facility that is not defined as a separate facility, (e.g., a hospital, lab, or clinic) to conduct training for a portion of a program that is not an externship or a clinical;
- However, under the proposed language, the use of a consortium agreement cannot be used to excuse meeting ACCSC's separate facility requirements that would otherwise apply—for example, a school could not argue that a lease with a landlord is a consortium or partnership “agreement” rather than a separate facility;
- A school, as is always the case, retains the responsibility to ensure that the education delivered meets accreditation standards and is accountable as such—e.g., a school could not point to failures of a hospital facility as an excuse for not otherwise meeting accreditation standards.

Also, please consider that in order for a program to be eligible for federal financial aid it must meet federal definitions/criteria/regulations despite any approval by ACCSC.

Below are the Commission's proposed revisions. Proposed new text in **Red, Bold, and Italic** print, and proposed deleted text is ~~blue strikethrough~~.

SECTION I – DEFINITIONS, ACCREDITATION OBLIGATIONS, ELIGIBILITY AND PROCESS, AND GENERAL INSTRUCTIONS

A. Definitions

- 8. The term “consortium or partnership agreement” means any instance where a portion of an ACCSC-accredited school’s approved programs is provided by or at another entity (accredited or unaccredited) or where another entity provides the facilities for the school to offer a portion of an approved program off-site in an employment setting whereby approval as a satellite location separate facility under these standards is not required.***

Renumber 9 through 20.

C. Educational Objectives

3. A school may enter into consortium or partnership agreements where a portion of a program is offered by ***or at*** an entity other than the ***ACCSC-accredited*** institution in accordance with these *Rules* and *Substantive Standards*.

5. Regardless of any consortium/partnership agreement or contractual arrangement, only programs or courses that have been recognized or approved in accordance with accrediting requirements may be represented as being within the scope of the school's institutional accreditation.

SECTION IV – NON-SUBSTANTIVE AND SUBSTANTIVE CHANGE NOTIFICATION AND APPLICATION REQUIREMENTS

A. Changes Requiring Notification

A school must notify the Commission of the following:

1. Any consortium, partnership, or contractual agreements with other schools or training providers in advance of such contracts taking effect (see *Section II (A)(8), Substantive Standards, Standards of Accreditation*);

There is no proposed revision in *Section IV (A)(1)*, but this is included here to show that this notification provision is already in place.

C. Substantive Changes

2. The Commission considers the following to be substantive changes to an educational institution:

- a. Level I – Staff Level Approval:

- xii. A consortium and/or partnership agreement with another school/entity (accredited or unaccredited) to **provide training and/or facilities for the delivery of** any portion of a program;

E. Substantive Change Application Requirements

6. Program Approval, Additions, and Modifications

- a. Substantive Change: New Programs or Changes Requiring Prior Commission Approval

- vi. Consortium/Partnership Agreements: In any instance where a portion of an approved program is ~~offered by~~ **delivered by or at** an entity other than the ACCSC-accredited institution via any consortium, partnership, or contractual agreement, the school must submit the Application for a Consortium/Partnership Agreement or the Application for a Distance Education Consortium/Partnership Agreement as applicable. An on-site evaluation may be required in conjunction with the approval of a consortium/partnership application based upon the scope of the agreement ~~and the accredited status of any other entity offering a portion of the school's program.~~

- b. On-site Evaluation Requirements: An on-site evaluation will be required for new program approval as follows:

- iv. The addition of distance education program delivery where:

3. A school proposes to offer a portion of a program by distance education through a consortium or partnership agreement with an entity that is not accredited by a recognized accrediting agency; or
 - v. The addition of a consortium/partnership agreement with an entity that is not accredited by a recognized accrediting agency to ~~teach~~ **engage in the delivery of** a portion of a school's program.

SECTION II – PROGRAM REQUIREMENTS

A. General Program Requirements

The following requirements apply to all programs, irrespective of the credential offered.

8. Consortium/Partnership Agreements

- a. In any instance where the school has entered into a consortium, partnership, or contractual agreement ~~to offer a portion of a program~~, the school retains responsibility for the quality of the courses of study and programs offered as well as the achievement of expected and acceptable outcomes irrespective of any such consortium, partnership, or contractual agreement.
- b. A school may not award more than 50% of the total number of clock or credit hours required in a program via a consortium, partnership, or contractual agreement, with the exception of an approved teach-out plan or agreement.

SECTION VIII – SEPARATE FACILITIES

A. Classification

~~There are three types of separate facilities: branch campus, satellite location, and distance education facility.~~

Management and Administrative Training

The Commission and ACCSC staff have noted that over time schools need additional resources and training to submit materials that effectively demonstrate compliance with accrediting standards. Specifically, the Commission and staff have observed that many schools have made changes and continue to work to resolve the repercussions of the impact of the pandemic-era policies, documentation, and the strains of trying to continue operations.

In this light, the Commission is adding training resources, such as video tutorials available on its website. It is the Commission's expectation that schools have sufficient resources, including human resources, that help to ensure that schools operate and demonstrate compliance with accrediting standards. To that end, the Commission is proposing to add this expectation to the on-going professional development requirement for school management and administrative staff.

Proposed new text in ***Red, Bold, and Italic*** print.

SECTION I – OWNERSHIP, MANAGEMENT, AND ADMINISTRATION

A. Ownership, Management, and Administrative Capacity

3. Members of school management and administrative employees must participate in ongoing development and training activities that support their particular roles in the school ***including as applicable, ACCSC requirements and procedures.***

Recruitment Standards

The Commission has reviewed a number of requests and proposals for the use of “recruiters” and representative agencies—particularly in international settings—incongruent with the current requirement that a school only use its own “employees” to conduct recruiting activities in accordance with *Section IV (A)(3) Substantive Standards, Standards of Accreditation*.

Upon review of these requests and proposals, the Commission believes that the requirement for “employee” may elevate form over substance. The substantive spirit and intent of the standard is to ensure that an institution has sufficient “control” over what an individual acting on behalf—or representing—the school can do or say in the student recruitment process. Therefore, the form through which a school exerts that control may be less important than the substance of the control itself, which likely can be achieved outside of traditional notions of employer/employee relationships and potentially through other forms of agreements and arrangements.

Accordingly, Commission proposes the revisions below that replace the term “employee” with “representative,” defines “representative” quite broadly, and which intend to maintain the requirement that regardless of any arrangement or agreement, a school retains the responsibility “for all statements made by and the conduct of the individual, employee, or agent when representing the school.” Please also note that all individual “representatives” would be expected to sign the ACCSC Code of Conduct for Individuals Engaged in Recruitment Activities.

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

SECTION IV – STUDENT RECRUITMENT, ADVERTISING, AND DISCLOSURES

A. Recruitment

3. A school only uses its own ~~employees~~ **representatives^{FN1}** to conduct student recruiting activities. ~~and is~~ **A school is** prohibited from engaging employment agencies to recruit prospective students. ~~Affiliated Schools^{FN2} under common ownership may employ a single recruiter share representatives to conduct recruitment activities.~~
4. A school is responsible to its students and prospective students for the actions and representations of its recruiters and representatives and, therefore, selects these individuals with the utmost care and provides adequate training and proper supervision. A school has and enforces an acceptable code of conduct for all school personnel whose primary responsibilities are to engage in recruiting and admissions functions prior to and during admission and matriculation. The school’s code of conduct is in writing, includes, minimally, all elements set forth in *Appendix IV, Substantive Standards, Standards of Accreditation*, is accepted and dated by the individual employee, and a copy of which is maintained in the individual’s personnel file.

^{FN1} **As used through this Section and in Appendix IV, “representative” means any individual, employee, or agent with whom the school enters into an arrangement (employment or contractual) whereby the school: a) is responsible for ensuring that the individuals, employees, or agents are operating in compliance and b) retains responsibility for all statements made by and the conduct of the individual, employee, or agent when representing the school. All requirements of this Section apply to all such personnel. See Appendix IV which requires a signed Code of Conduct for recruitment personnel and contract representatives.**

^{FN2} **See Section I, Rules of Process and Procedures, Standards of Accreditation for a Definition of “affiliated schools.”**

APPENDIX IV – ~~RECRUITMENT AND ADMISSIONS PERSONNEL CODE OF CONDUCT~~ ACCSC Code of Conduct for Individuals/Representatives Engaged in Recruitment Activities^{FN}

~~The provisions below~~ **This appendix** sets forth the items that, at a minimum, are to be included in the Code of Conduct required by *Section IV (A)(4), Substantive Standards, Standards of Accreditation*. The school may choose the specific language to be used in its Code of Conduct so long as the language conforms to the spirit and intent of the items below. The school may also include other elements in the Code of Conduct as it deems appropriate. The Code of Conduct must be in writing and accepted, minimally, by all ~~school~~ personnel whose primary duties include student recruitment and admissions functions.

^{FN} *As used through this Appendix and in Section IV, “representative” means any individual, employee, or agent with whom the school enters into an arrangement (employment or contractual) whereby the school: a) is responsible for ensuring that the individuals, employees, or agents are operating in compliance and b) retains responsibility for all statements made by and the conduct of the individual, employee, or agent when representing the school. All requirements of this Section apply to all such personnel.*

Accreditation and Approval Disclosures

During on-site evaluations, teams have observed that information provided as part of an accreditation application, in particular the Application for Renewal of Accreditation, is:

- Frequently inconsistent with regard to approval by a third-party regulatory agency and/or accreditation and
- Does not cover the full array of approvals.

This has the effect of leaving students with incomplete or inaccurate information regarding state agency approval and whether an institution has required programmatic approvals (e.g., programmatic accreditation, state board, national examination type agencies). For example, a school may indicate that it is approved to operate by the Commission on Independent Education in the state of Florida but makes no mention of the Florida Board of Nursing approval for the nursing program. Other examples include cosmetology/barbering schools that may be approved by both a state agency and a Cosmetology/Barbering Board, flight schools that may be approved by both a state agency and the FAA, and truck driving schools that may be approved by both a state agency and a state department of transportation. The lack of complete information also leaves students unsure where to check the status of program approval, where to lodge a complaint, or whether the program is eligible for the student to take an industry examination.

Several years ago, the Commission sought to bridge this issue by requiring institutions to disclose approval by a regulatory agency and adding *Section IV (C)(4)(c), Substantive Standards, Standards of Accreditation*. While the *Standards of Accreditation* direct schools to disclose this information, the standards do not provide any guidance on how or where to disclose this information.

Therefore, in order to help ensure that students and ACCSC are receiving accurate information, the Commission is proposing the following revision to *Section IV (C)(4)(c), Substantive Standards, Standards of Accreditation* with additional direction in the *Catalog Checklist*.

Proposed new text is in **bold, red, and italic** print, deleted text in ~~blue strikethrough~~.

SECTION IV – STUDENT RECRUITMENT, ADVERTISING, AND DISCLOSURES

C. Disclosures

4. Accreditation and Approval

- c. *The school must disclose in its catalog all state, federal, and accreditation approvals for which the institution has received, ~~Where a program requires accreditation (institutional or programmatic) and/or approval by a third-party regulatory agency (e.g., state or federal approving/authorizing agency, licensing agency, oversight board, national certification entity, institutional or programmatic accreditation, etc.).~~ In cases where a program requires specific approval for the purpose of licensure, examination, certification, or employment, a school discloses to students whether or not such accreditation and/or third-party recognition has been achieved and is in good standing. Any claims regarding any type of accreditation or approval by an oversight entity must be truthful and accurate.*

ACCSC Catalog Checklist:

Item Number	Catalog Checklist – Required Items	Page Number(s)
6.	<i>A list of all state and/or federal regulatory or oversight agencies from which the school has received approval/authorization (e.g., state and/or federal approving/authorizing agency, licensing agency, oversight board, national certification entity, etc.) and a list of all institutional or programmatic accrediting agencies from which the school has received a grant of accreditation (if programmatic, include the specific accredited program).</i>	

Current items 6. through 24. would be renumbered 7. to 25.

Student Satisfaction

The Commission presents the following proposed revision meant to more clearly establish expectations for schools to have “mechanisms for ongoing attentiveness to student needs” that support student achievement and that schools should monitor student satisfaction for this same goal. Student survey results are often cited in On-site Evaluation Reports and the *Standards* currently do not specifically set any expectations or requirements other than the school being attentive to student needs.

The Commission proposes the following revisions. Proposed added text in *red bold italic text* and proposed deleted text in ~~blue strikethrough text~~.

SECTION VI – STUDENT SERVICES AND RECORDS

STATEMENT OF PURPOSE

The purpose of this section is to describe the fundamentals of assessing and addressing students’ educational and other needs and ensuring an appropriate and safe learning environment. Basic elements include mechanisms for ongoing attentiveness to student needs and directing appropriate resources to address those needs. Resources include support for students’ academic and nonacademic needs; employment assistance; and the availability and secure maintenance of student records.

A. Student Services

1. The school:
 - a. Is attentive to its students' ~~educational and other~~ needs as a means to support ~~retention~~ ***student achievement***;
 - b. ~~It~~ Maintains written policies and procedures addressing student services; and
 - c. ~~It~~ Makes students aware of such services.
5. The school continually monitors and addresses ~~the students'~~ ***satisfaction and student*** needs for services as a means to assist students achieve successful educational and student achievement outcomes.

Use of a Diminutive Name (Nickname)

Background and Proposal:

Currently, ACCSC allows schools to apply for and record one name in its official record (College 360) and has issued guidance regarding advertising an “abbreviated name.” The Commission proposes a potential process to allow school’s to use a diminutive name (e.g., a shortened version or nickname) and for both versions of the name to be added to the school’s College 360 profile. Once approved, this would allow schools to use both forms of the name largely, although not entirely, interchangeably.

The intent is that beginning July 1, 2025, schools will have an opportunity to apply for the use of a diminutive name (nickname). For applications submitted before December 31, 2025, no processing fee shall apply. Applications submitted after December 31, 2025 will require a \$350 processing fee. Upon approval of the application, the diminutive name will be added to the “School Info” tab of the institution’s College 360 profile.

Commission proposes the following new text in ***red bold italic text*** and proposed deleted text in ~~blue strikethrough text~~.

APPENDIX I – ACCREDITATION FEES

Application for Use of a Diminutive Name..... \$350

APPENDIX IV – RECRUITMENT AND ADVERTISING

GUIDELINES FOR ADVERTISING

3. A school may only advertise its name ***or a diminutive version of its name^{FN}*** as approved by the Commission. ***In places where the Standards of Accreditation require the inclusion of the school’s name, then the school must use the full name of the school (e.g., enrollment agreement, transcript, completion credential).*** ~~except that a school may use an abbreviation in its advertising so long as the school’s full name is included at least once. In addition, a school may also use an abbreviation of its name for building signage and in documents provided to students, so long as the school’s full name is used in those circumstances prominently at least once.~~

^{FN}Submit the Application for Use of a Diminutive Name for approval of a diminutive version of the school’s name (e.g., nickname).

Use of Consultants

In 2008, the Commission adopted *Appendix VIII - Statement for Working with External Consultants in the Accreditation Process*. The Commission—informed by the experiences of on-site evaluation team members—had found several experiences when an institution’s utilization/reliance of an external consultant appeared to eclipse the participation of school staff during accreditation reviews. These experiences included work that was clearly produced by a consultant for the sole purpose of achieving a positive accreditation outcome, but that did not represent sustainable practice within the institution and instances where consultants would insert themselves into the on-site evaluation process to answer questions and argue with team members regarding compliance with accrediting standards.

While *Appendix VIII* speaks to the use of “the utilization of external consultants in the accreditation process,” the appendix only addresses interaction with external consultants during the on-site evaluation. Recently, several instances have been noted where schools are utilizing consultants in a variety of other manners including, among others:

- Giving consultants school email addresses so that they appear to be part of the institution with questions about employment status (temporary vs. permanent) and an individual’s “external” relationship to a school;
- Consultants reaching out on behalf of multiple unrelated schools leading to confusion and applications requiring additional information and staff resources;
- Utilizing consultants to fill vacant positions to meet the standard as written without an intention of permanent replacement;
- Consultants serving in a “full-time” position at one campus (e.g., School Director or Director of Education) while also indicating assistance at another campus in a “full-time” role;
- Using consultants in a way that creates concerns about lines of communication and confidentiality of school records; and
- Using consultants in a way that creates concerns about the extent of a school’s ongoing resources when making accreditation decisions.

Accordingly, in order to ensure that staff and schools have proper guidance as it relates to interacting with consultants, Commission proposes the revisions below to *Appendix VIII* with proposed new added text in **red bold italic text** and proposed deleted text in ~~blue strikethrough text~~.

ACCSC STANDARDS OF ACCREDITATION APPENDIX VIII – STATEMENT FOR WORKING WITH EXTERNAL CONSULTANTS IN THE ACCREDITATION PROCESS

ACCSC STATEMENT FOR SCHOOLS WORKING WITH ~~EXTERNAL~~ CONSULTANTS IN THE ACCREDITATION PROCESS

The following statement is provided to assist an institution undergoing the process of accreditation to understand the perspective of the Commission regarding the utilization of ~~external~~ consultants in the accreditation process.

ACCSC does not take a position with regard to whether institutions should seek the assistance of ~~an external~~ consultant while undergoing any part of the accreditation process, particularly the self-evaluation process.

Furthermore, ACCSC does not recommend specific individuals or consulting firms to any institution seeking [external](#) assistance.

If an institution chooses to use an [external](#) consultant in the accreditation process, the [external](#) consultant may not be present at the institution during any part of an on-site evaluation. The ***Commission and*** on-site evaluation team will expect to communicate directly with management and employees of the institution and not with a consultant employed solely for the purpose of completing the accreditation process. ***Regarding a substantive change process or other required compliance reports and responses, the Commission allows for the involvement of a consultant; however, communications should include both the institution and the consultant together.***