

CALL FOR Comment

To: ACCSC-Accredited Institutions and Other Interested Parties
From: Michale S. McComis, Ed.D., Executive Director
Date: May 7, 2026
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:

- **Submission of Documents to the Commission**
- **Substantive Change Requirements - Changes of Control**
- **Program Requirements**
- **Faculty Qualifications**
- **Distance Education Admissions Assessment**
- **Consortium/Partnership Agreements**

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 **June 8, 2026**. 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.

SUBMISSION OF DOCUMENTS TO THE COMMISSION

As a means to make clearer the Commission's requirements for the submission of documents, the Commission is proposing the following revisions. This includes the requirements that all submissions be organized and submitted as required by the ACCSC Instructions for Electronic Submission, with specifics such as the use of required software, inclusion of navigational bookmarks and hyperlinks, and clear guidelines for digital formats. The new language also clarifies that submissions must be accompanied by a certification statement attesting to the accuracy of the information. Furthermore, all documents must be uploaded to the ACCSC's Electronic Record Management System, and submissions sent by email but not uploaded will not be considered as meeting the submission or notification requirements. These changes are intended to modernize and clarify the submission process, ensuring accuracy, consistency, and proper documentation handling.

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CHAPTER 1 – RULES OF PROCESS AND PROCEDURE

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

H. General Instructions – Submission of Documents to the Commission

1. All submissions and notifications to the Commission must be organized and prepared in accordance with any specific instructions issued by the Commission and with the following specifications. All submissions and notifications must be:
 - a. Typewritten, clear, and legible (photocopies must be legible and photographs must be digital originals or clear copies);
 - b. Organized **and submitted** as required by the ACCSC Instructions for Electronic Submission (e.g., **prepared** ~~bookmarked~~ using required software, **inclusion of navigational bookmarks and hyperlinks**, etc.);
 - c. Identified with the school's ACCSC reference number and ~~include~~ **accompanied by** a certification statement attesting to the accuracy of the information; and
 - d. Uploaded to ACCSC's Electronic Record Management System ~~---(submissions and notifications~~ **sent via e-mail and** not uploaded will not be considered to have met ~~notification submission or submission-notification requirements~~).
2. Instructions for completing applications and reports are included on the forms for each process. A school may, upon request, receive special or additional instructions from the ACCSC staff either by telephone, letter, e-mail, or in person at the ACCSC office.
3. ACCSC requires that all documentation be submitted in English or accompanied by an appropriate English translation.

SUBSTANTIVE CHANGE REQUIREMENTS - CHANGE OF CONTROL

Pursuant to federal regulations, all recognized accreditors are required to have substantive change processes for “[a]ny change in the legal status, **form of control**, or ownership” of the institution. Although ACCSC has such a requirement, there is language in the *Rules of Process and Procedure* that could be construed as not requiring a substantive change application when only the “form of control” changes. That language,

however, is meant to be illustrative and is not intended to provide an exemption from the requirement to file a substantive change application when only the form of control changes. Thus, the Commission is suggesting modifying the language to state more plainly what is required as opposed to what is not. Similarly, the Commission is proposing to clarify language around “warrants, options, and other rights to acquire ownership/controlling interests” focusing primarily on what is required. In both cases, the staff will use the change of control application and modification of ownership report to provide additional guidance with regard to when each process applies and to provide the examples which currently exist in the footnotes.

With regard to a “total-reevaluation” requirements for schools that undergo a change of control, there have been several instances where new school owners have been unable to demonstrate an ability to operate a school in compliance with accrediting standards post change of control transaction. In such instances, it would have been beneficial for the school to undergo a total reevaluation sooner rather than later. In instances where a school that has undergone a change of control has several years remaining in its term of accreditation, a significant period of time could go by before the Commission may discover issues or problems related to the school’s operations and/or compliance with accrediting standards. Therefore, the Commission is proposing that a total-reevaluation be required in any instance where a school would have greater than 24 months left in its term of accreditation post transaction as a means to provide an opportunity for the new owner to undergo a self-evaluation process with the newly acquired school. The Commission does realize that extenuating circumstances may exist and as such has included an option for the school/new owner to make such a case.

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CHAPTER 1 – RULES OF PROCESS AND PROCEDURE

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

E. Substantive Change Application Requirements

2. Change of Control and Change of Ownership^{FN}

- b. Examples of Transactions Considered to Be a Change of Ownership and Control: The examples listed below are illustrative only. Even if a transaction is not described in this list of examples, it will be considered a change of control requiring prior Commission approval if it meets the general definition of a change of control stated above.

ix. Exercising a right to acquire control (through ownership or otherwise) through any agreement, option, warrant, or other means.

- f. Change/Modification in Ownership Not Resulting in a Change of Control: A transaction resulting in a less than 10% change in ownership *and does not result in change of control* requires written notification to the Commission. *In cases where the same* ~~The Commission is principally concerned with the actual ability to control rather than the form through which control is exercised and does not require~~ controlling parties ~~that~~ retain control after a change of ownership transaction, *the school is required to submit a Modification of Ownership Report at least 30 days prior to the transaction.* ~~to submit a change of control application.~~ Such cases include:

- i. A *transaction which results in a 10% or greater change in the ownership but does not result in a change of control*~~change in the ownership that does not result in a change of control. For example, a 100% owner sells 25% of the ownership retaining 75% and thus retaining control. In such instances, a transaction which results in a 10% or greater change in the ownership requires the submission of a Modification of Ownership Report.~~ ~~A~~

~~transaction resulting in a less than 10% change in ownership requires written notification to the Commission.~~

- ii. A transaction whereby the ownership entity changes but the same parties who had the ability to control the actions of the school (i.e., majority ownership interest) retain that ability after the transaction ~~does not constitute a change of control but does require the submission of a Modification of Ownership Report. For example, a sole proprietorship changing to a limited liability partnership would not be considered a change of control if the ownership party that originally had the ability to control the direction of the school retained a majority ownership interest and the ability to control the direction of the school in the newly created LLP. This type of transaction requires the submission of a Modification of Ownership Report.~~
- g. Change of Control Application Exclusions: The following are not considered changes of control that require approval through the filing of a change of control application.
 - iii. **Unexercised or inchoate** Options, warrants, and other rights to acquire ownership/controlling interests: ~~These provisions~~ are generally not considered in determining ownership/control ~~unless accompanied by agreements that substantially affect the ability to control the management and operations of the school.~~ However, should any **such** such option or right to acquire control—(through ownership, **interest**, or otherwise)—be exercised, the school must file a change of control application and receive advance approval in accordance with these *Rules*.
- r. Total Re-Evaluation: ~~If warranted~~ ***In all cases, when the length of time remaining in the school's term of accreditation post transaction is greater than 24 months, the Commission will*** ~~may~~ require the school and any separate facilities to undergo a total re-evaluation, ***unless the school can show good cause as to why a total re-evaluation is unwarranted.*** A total re-evaluation of the school will require the school's director to attend the next scheduled Accreditation Workshop, the submission of an Application for Renewal of Accreditation and Self-Evaluation Report, the submission of all required fees, and a full-team on-site evaluation as prescribed by *Section III, Rules of Process and Procedure, Standards of Accreditation*.

^{FN} See the Application for a Change of Control-Part I and the Modification of Ownership Report for specific requirements and examples.

PROGRAM REQUIREMENTS

While there is an entire section devoted to substantive changes for new programs, there is no explicit language that schools must submit the appropriate substantive change application for the approval of any new program as set forth in the *Rules*. Moreover, although implied throughout the *Standards of Accreditation* there is a lack of clear language informing schools of the expectation that demonstrating sufficient experience and resources necessary to offer a program is a condition of approval. This is particularly important in cases where schools seek to change mission, change educational objectives, and/or significantly expand the range/scale/scope of programs offered such that the school accredited by ACCSC would become fundamentally different. This proposed revision is intended to make the Commission's expectations explicit.

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CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION II – PROGRAM REQUIREMENTS

A. General Program Requirements

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

1. Approval and Programmatic Accreditation
 - a. Schools must:
 - i. Submit the appropriate substantive change application for the approval of any new program as set forth in the Rules;***
 - ii. ~~h~~Have each program reviewed and approved by the Commission before the program is offered to students;^{FN} and***
 - iii. Demonstrate sufficient experience and resources necessary to offer a program.***

FN For a school applying for accreditation for the first time, this means that each program offered by the school must be included in the initial accreditation application process.

FACULTY QUALIFICATIONS

The Commission has reviewed faculty qualifications under *Section II (B)(7), Substantive Standards, Standards of Accreditation* which considers “outstanding professional experience and contributions to the occupational field of study” in lieu of a formal degree for teaching in an academic degree program. The review included the history and intent of the standard when it was developed and that the Commission purposefully placed the burden with the school to make determinations in this area (i.e., there is not a need for a “waiver” in these cases). The Commission discussed how the standard has been applied in different scenarios and the subjectivity associated with the term “outstanding.” Based on its review, the Commission proposes to maintain this “in lieu of” allowance but to strike the expectation of “outstanding” professional experience and to retain the requirement that schools have the responsibility to make a showing of appropriate faculty qualifications in all instances.

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CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION III – EDUCATIONAL ADMINISTRATION AND FACULTY QUALIFICATIONS

B. Faculty Qualifications

7. Faculty teaching technical and occupationally related courses in an academic associate or baccalaureate degree program must have a minimum of four years of related practical work experience in the subject area(s) taught and possess a related degree at least at the same level of the course the faculty member is teaching. In ***limited and*** exceptional cases, ~~outstanding~~ professional experience and contributions to the occupational field of study may be substituted for a formal degree. In such instances, the faculty member must possess a minimum of eight years of related practical work experience and the school must justify and document on an individual basis ~~the~~

~~outstanding~~ **why the** professional experience and contributions to the occupational field **should warrant substitution of the related degree.**

DISTANCE EDUCATION ADMISSIONS ASSESSMENT

Upon review of this area the Commission found that reliance upon the existing standards in *Section V (A)* is sufficient for assessing a school's admissions criteria across an array of residential, hybrid, or 100% distance education programs, rather than having a specific Distance Education assessment. Under *Section V (A)*, the onus rests with the school to show that it has admissions criteria designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered and which take into account the nature of the training and education provided and the program's responsibilities and demands. Moreover, these revisions remove the expectation that school assess "learning styles" as part of the admissions criteria as experience with learning technologies have expanded greatly since the time that the distance education standards were first developed and promulgated. The Commission believes that an assessment of access and technical readiness prior to enrollment in a distance course or program remains a reasonable expectation of the *Standards*—e.g., does the student have sufficient access to equipment, bandwidth, hardware, or software that may be necessary to participate in the distance education platform. Based on the foregoing, the Commission proposes the following revisions to the *Standards of Accreditation*.

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CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION V – ADMISSIONS POLICIES AND PRACTICES

A. General Requirements

1. The school must develop admissions criteria that are designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered **and which take into account the nature of the training and education provided and the program's responsibilities and demands.**
2. The school must publish in its catalog and inform, prior to admission, each applicant for enrollment of the program's admission requirements, process, and procedures; the nature of the training and education provided; and the program's responsibilities and demands. (See also *Section IV (C), Substantive Standards, Standards of Accreditation.*)
3. The school must consistently and fairly apply its admission requirements.
4. Prior to enrollment the school must:
 - a. Determine that an applicant meets the school's admissions requirements;
 - b. For distance education courses or programs, review an applicant's access and technical readiness relative to the school's specific distance education platform/environment;**
 - ~~b~~c. Secure documentation to demonstrate that each applicant meets all admission requirements; and
 - ~~e~~d. Document that applicants rejected did not meet admissions requirements.

SECTION IX – DISTANCE EDUCATION

~~F. Admissions Requirements and Enrollment~~

- ~~1. The school must demonstrate compliance with Section V, Substantive Standards, Standards of Accreditation and must be able to document that students admitted into distance education programs or courses of study met the school's admissions criteria.~~
- ~~2. The school must establish an admissions process for distance education programs and courses of study that includes the following:~~
 - ~~a. An assessment of the student's technical skills, competencies, and access to technology necessary to succeed in a distance education environment prior to their enrollment in the program or course of study.~~
 - ~~b. An assessment of the student's capability to benefit from enrolling in a distance education program prior to enrollment. The school must utilize an assessment tool (e.g., test, preparation/orientation course, etc.) to determine if the student's learning style is conducive to online learning.~~
- ~~3. The school must demonstrate the validity and reliability of the assessment tools used to assess a student's readiness for distance education online learning minimally using engagement surveys, academic progress, and student achievement data.~~

CONSORTIUM/PARTNERSHIP AGREEMENTS

Staff have received several inquiries from schools interested in partnering with institutions or other entities to teach a portion of their academic programs. Current standards limit instruction delivered via a consortium/partnership agreement to no more than 50% of a program. An option is being proposed here that would allow schools to enter consortium/partnership arrangements exceeding 50% when innovative and appropriate educational delivery options are presented. This is not meant to allow for the significant outsourcing of a program; however, the Commission acknowledges that there can be developed high-quality programs where ACCSC-accredited schools can partner with other educational institutions to offer dual degree programs or with business and industry to provide cooperative training and hands-on skill development. Such instances would require review and approval at the Commission level and would require a justification from the school as to why such an agreement should be allowed. As is currently the case, the school in all instances retains the responsibility for the program to be offered in a manner that meets ACCSC's standards irrespective of any consortium/partnership agreement. The Commission is interested in hearing from the membership regarding these types of arrangements agreements and whether the allowance being proposed here continues to represent appropriate and adequate oversight of programs and educational quality.

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CHAPTER 1 – RULES OF PROCESS AND PROCEDURE

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

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*.

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

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) for the delivery of ~~a portion of a program~~ *less than 50% of the total clock or credit hours of a program*; and
 - xiii. An Institutional Teach-Out Agreement (unless the agreement establishes a permanent separate facility)
 - b. Level II – Commission Level Approval:
 - viii. An addition of a branch campus or other separate facility; ~~and~~
 - ix. An Institutional Teach-Out Agreement that establishes a permanent separate facility; *and*
 - x. *A consortium/partnership agreement with another school/entity (accredited or unaccredited) for the delivery of 50% or more of the total clock or credit hours 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 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 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 on the scope of the agreement.

CHAPTER 2 – SUBSTANTIVE STANDARDS

SECTION II – PROGRAM REQUIREMENTS

B. General Program Requirements

8. Consortium/Partnership Agreements
 - a. In any instance where the school has entered into a consortium/~~partnership, or contractual~~ agreement, 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~~ ***Any program where 50% or more*** of the total number of clock or credit hours ***is*** offered ~~required in a program~~ via a consortium/partnership, ~~or contractual agreement~~, ***requires review and approval by the Commission. A school may not award more than 75% of the total number of clock or credit hours required in a program via a consortium/partnership agreement,*** with the exception of an approved teach-out plan or agreement.