NECHE
New England Commission of Higher Education

October 31, 2018

The Honorable Senator Elizabeth Warren
617 Hart Senate Office Building
Washington, DC 20510

Dear Senator Warren:

I write in response to your letter of October 30, 2018 regarding ACICS. I have also spoken with Josh Delaney and Faina Dookh in your office.

My responses to your specific questions are below:

1. We have not provided, between 2016 and 2018, any oral or written statements to the U.S. Department of Education nor to ACICS endorsing ACICS as an accepted accreditor within the higher education community.

2. Between 2016 and 2018, we have not had any other communication with the U.S. Department of Education nor with ACICS soliciting an endorsement of ACICS.

3. C-RAC, the Council of Regional Accreditors, met with Diane Jones in early October, and we pointed out to her that we had not provided any endorsement of ACICS. Ms. Jones said that this was an editing error and would be corrected. The accreditors who spoke were those whose names were correct in the report, as opposed to the listing of NCASC, which I suppose was likely to have referred to NEASC.

4. We do not have any relationship with ACICS nor with the institutions they accredit, so would not be in a position to endorse them as a "widely accepted" accreditor.

As I explained to Mr. Delaney and Ms. Dookh, our Commission is now separately incorporated as the New England Commission of Higher Education (NECHE) and no longer a component part of NEASC.

Please let me know if you have further questions.

Sincerely,

Barbara Brittingham

BB/bec

3 Burlington Woods Drive, Suite 100, Burlington, MA 01803-4514
Toll Free: 855-886-3272 | Tel: 781-425-7785 | Fax: 781-425-1001
cihe.neasc.org

WSC Senior College and University Commission

October 19, 2018

Honorable Elizabeth Warren
Honorable Richard Durbin
Honorable Sherrod Brown
Honorable Richard Blumenthal
United States Senate
Washington, DC 20510

Dear Senators Warren, Blumenthal, Brown and Durbin,

Thank you for your letter of October 18, 2018 and the opportunity to clarify that WSCUC has made no statements on the recognition of ACICS.

In response to your specific questions,

1. No, WSCUC did not provide any statements to the US Department of Education or ACICS regarding or endorsing ACICS.

2. This agency has no record of communication from the Department or ACICS soliciting such an endorsement.

3. On October 3, 2018 several other presidents of accrediting agencies and I met with the Senior Department Official about a range of higher education and accreditation issues. In the course of that meeting we pointed out the erroneous statement in her recommendation to the Secretary and clarified that the four regional agencies cited had not submitted "letters of support" or any other endorsement for ACICS's recognition.

4. I do not know why the Department referred inaccurately to WSCUC as having endorsed the recognition of ACICS.

5. WSCUC has not taken a position on this subject.

We appreciate that the Department has now corrected the SDO's recommendation to delete the erroneous references on the important issue of wide acceptance of ACICS.

Please contact me if I can be of further assistance.

Sincerely,

Jamienne S. Studley
President

DEAC
DISTANCE EDUCATION ACCREDITING COMMISSION

1101 17th Street NW, Suite 808
Washington, DC 20036
202.234.5100 | deac.org

October 25, 2018

The Honorable United States Senators
Elizabeth Warren, Richard J. Durbin, Sherrod Brown
and Richard Blumenthal
The United States Senate Committee
on Health Education Labor and Pensions
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Senators Warren, Durbin, Brown, and Blumenthal:

I write on behalf of the Distance Education Accrediting Commission (DEAC) in response to your letter of October 18, 2018. That letter requests information and documentation regarding any formal or informal communication between DEAC and the United States Department of Education or the Accrediting Council of Independent Colleges and Schools (ACICS) related to a "letter of support" or "endorsement" that may have been requested by ACICS or provided by DEAC. We provide the following answers to the specific questions posed.

1. Has your organization, between 2016-2018, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing ACICS as an accepted accreditor within the higher education community? If so, please provide copies of any such letters.

Answer: DEAC has not, between 2016-2018, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing ACICS as an accepted accreditor within the higher education community.

2. Has your organization, between 2016-2018, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?

Answer: DEAC has not had any communication with the U.S. Department of Education or directly with ACICS soliciting DEAC's endorsement of ACICS.

3. Has your organization provided verbal or written statements to the U.S. Department of Education disputing that you endorsed ACICS as an accepted accreditor within the higher education community? If so, please provide the statement.

Answer: DEAC has not provided verbal or written statements to the U.S. Department of Education disputing that DEAC endorsed ACICS as an accepted accreditor within the higher education community.

4. Why do you believe the U.S. Department of Education referenced your organization as one of the nine accreditors that endorsed ACICS?

Answer: DEAC does not know why the U.S. Department of Education referenced DEAC. However, in the interest of full disclosure, DEAC received an unsolicited email from ACICS on October 5, 2018 which sets out ACICS' views on this issue. A copy of this email is attached.

5. Do you endorse ACICS as a "widely accepted" accreditor? Why or why not?

Answer: DEAC has a policy not to endorse other organizations.

We trust that this letter adequately responds to your inquiries.

Respectfully Submitted,

Leah K. Matthews, Ph.D.
Executive Director

cc. Faina Dookh

From: Michelle Edwards <medwards@acics.org>
Sent: Friday, October 5, 2018 1:49 PM
To: Leah K. Matthews
Subject: ACICS Acceptance By Others

Good Afternoon Leah,

As you are aware, the Senior Department Official (SDO) at the Department of Education recently recommended to the Secretary that ACICS should continue to operate as a federally recognized accrediting agency. As part of that decision, the SDO reported that ACICS was in compliance with 19 of the 21 federal recognition criteria currently applicable to accrediting agencies (34 CFR Part 602). Furthermore, the SDO determined that "ACICS was likely in compliance with many of these criteria in 2016 at the time of the Secretary's Decision" in 2016 that revoked ACICS recognition.

Regarding the two areas where the SDO states that ACICS has not demonstrated full compliance - "competency of the representatives" and "conflict of interest" - the SDO recommends that ACICS be granted 12 months to demonstrate compliance. The SDO further stated that ACICS is likely to achieve compliance with these two criteria in the next 12 months. The Secretary must now review the SDO decision and make a final determination on ACICS recognized status.

Among the criteria that the SDO evaluated was whether or not ACICS meets the "wide acceptance" criteria, and in issuing the report, the Department erroneously reported ACICS had won the support of nine other accrediting organizations, including your organization.

To be clear, in our submission to the Department, ACICS submitted an exhibit that referred to the agency affiliations of letter writers, but did not suggest that the agency itself was endorsing ACICS as part of that letter. The SDO determined that ACICS was in compliance with the wide acceptance criteria based on other information submitted by ACICS.

Upon receiving the Department's recommendation, ACICS identified the error and promptly notified the SDO. The Department was already aware of the issue and informed us that they were preparing to issue a clarification regarding their error, which they have now done. We understand from the Department that this was an editorial error on their part, and we are grateful that they have moved quickly to correct it.

As always, please let me know if you have any questions on this or other matters.

Sincerely,
Michelle

Michelle Edwards
President and CEO
Accrediting Council for Independent Colleges and Schools
750 First Street, NE | Suite 980 | Washington, DC 20002
www.acics.org | 202.336.6780 – p | 202.842.2593 – f

ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
1722 N. Street, N.W., Washington, D.C. 20036
Telephone : 202-955-1113 Fax: 202-955-1118
http://www.accet.org

October 23, 2018

Faina Dookh
Legislative Fellow
Office of Senator Elizabeth Warren
317 Hart Senate Office Building
Washington, D.C. 20510

Dear Faina Dookh:

Thank you for your email dated October 18, 2018 that forwarded the letter authorized by Senators Warren, Blumenthal, Brown and Durbin.

The Commission of the Accrediting Council for Continuing Education and Training (ACCET) has no standing related to the Accrediting Council of Independent Colleges and Schools (ACICS) decisions. Accordingly, the Commission has taken no official action regarding the ACICS issue nor does it intend to do so in the future.

Your inquiry is duly noted and appreciated.

Respectfully,

William V. Larkin

William V. Larkin, Ed.D.
Executive Director

ACCJC
ACCREDITING COMMISSION FOR COMMUNITY AND JUNIOR COLLEGES
WESTERN ASSOCIATION OF SCHOOLS AND COLLEGES

Richard Winn, President
Ian Walton, Chair

October 18, 2018

Faina Dookh
Legislative Fellow
Office of Senator Elizabeth Warren
317 Hart Senate Office Building
Washington, DC 20510

Dear Faina Dookh and Colleagues:

I am writing in response to your letter of October 18, 2018, regarding assertions of my organization's support for ACICS. I will respond to each of your numbered questions.

1. This organization has not, at any time, provided any written or verbal statements to the U.S. Department of Education, or to ACICS, regarding that agency's acceptance as an accreditor within the higher education community.

2. This organization has not been approached at any time by any person or entity soliciting our endorsement of ACICS.

3. The several presidents of the regional accrediting agencies, including myself, met in person with the SDO on the morning of October 3 of this year. Among a number of other topics, we explicitly confirmed to her that our organizations had not provided any written or verbal endorsements of ACICS. She indicated that the reference to our endorsements was an editorial mistake and that she would make appropriate corrections.

4. I have no information regarding why my organization may have been referenced in the SDO's letter.

5. Endorsement of another accrediting agency is outside the scope of our responsibilities. Our understanding of §602.13 is that an accreditor must enjoy the wide acceptance of its member institutions and the constituencies they serve. We have not understood this to apply to other accrediting agencies.

I trust that this is responsive to your inquiries.

Sincerely,

Richard Winn, Ed.D.
President

Tel: 415-506-0234
Fax: 415-506-0238

10 Commercial Boulevard, Suite 204
Novato, CA 94949

accjc@accjc.org
accjc.org

ACCSC
Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

November 6, 2018

ELECTRONIC DELIVERY
Faina_Dookh@warren.senate.gov

Faina Dookh
Legislative Fellow
Office of Senator Elizabeth Warren
317 Hart Senate Office Building
Washington, DC 20510

Dear Ms. Dookh:

The Accrediting Commission of Career Schools and Colleges ("ACCSC") has received the October 30, 2018 letter from Sen. Warren, Sen. Blumenthal, Sen. Brown, and Sen. Durbin which requests that ACCSC provide information with regard to communication between ACCSC and the U.S. Department of Education ("Department") or the Accrediting Council of Independent Colleges and Schools ("ACICS") related to the recognition of ACICS by the Department.

As an initial matter, ACCSC cannot say with certainty that the Senior Department Official ("SDO") in fact represented ACCSC as an organization that endorsed ACICS. Specifically, the *SDO Response to ACICS* references the acronym "ACSC" not "ACCSC" in the identified section of the SDO's letter.[1] Having said that, ACCSC's responses to the specific questions included in the October 30, 2018 letter follow below.

Questions from the October 30, 2018 Letter:

1. Has your organization, between 2016-2018, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing ACICS as an accepted accreditor within the higher education community?

   No.

2. Has your organization, between 2016-2018, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?

   No.

3. Has your organization provided verbal or written statements to the U.S. Department of Education disputing that you endorsed ACICS as an accepted accreditor within the higher education community?

   ACCSC has not provided verbal or written statements to the U.S. Department of Education disputing that it had endorsed ACICS as an accepted accreditor. ACCSC is not listed in the *SDO's Response to ACICS*.

[1] "In its supplemental materials, ACICS also provides letters of support from nine other accrediting agencies, including ACCET, DEAC, SACS, WASC, ACSC, NCASC, ABHES, MSCHE, and ACCJC." See page 24 of 77 of *SDO Response to ACICS*.

4. Why do you believe the U.S. Department of Education referenced your organization as one of the nine accreditors that endorsed ACICS?

   ACCSC is not included as an organization that endorsed ACICS in the *SDO's Response to ACICS*. ACCSC does not know why ACCSC would be referenced, I have, however, provided a copy of an e-mail that I received from ACICS regarding this matter.

5. Do you endorse ACICS as a "widely accepted" accreditor? Why or why not?

   ACCSC is recognized by the Department to ensure educational quality at postsecondary schools and colleges that offer career, technical, and vocational programs. Endorsing accrediting agencies is not within ACCSC's purview.

Please feel free to contact me directly at 703.247.4520 or mccomis@accsc.org with any additional questions you may have.

Respectfully,

Michale S. McComis, Ed.D.
Executive Director

Middle States Commission on Higher Education
3624 Market Street, Philadelphia, PA 19104 Tel: 267-284-5000 www.msche.org

October 24, 2018

The Honorable Elizabeth Warren
United States Senate
U.S. Congress
Washington, D.C. 20510

The Honorable Richard J. Durbin
United States Senate
U.S. Congress
Washington, D.C. 20510

The Honorable Kamala D. Harris
United States Senate
U.S. Congress
Washington, D.C. 20510

The Honorable Sherrod Brown
United States Senate
U.S. Congress
Washington, D.C. 20510

Dear Members of the Senate:

I am writing in response to your letter dated October 18, 2018, requesting information and documentation regarding any formal or informal communication between the Middle States Commission on Higher Education (MSCHE) and the Department relating to the Accrediting Council of Independent Colleges and Schools (ACICS). I am replying to each of the numbered questions you presented below:

1. Between 2016-2018, the MSCHE did not provide verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing ACICS as an accepted accreditor within the higher education community.

2. Between 2016-2018, the MSCHE has had no communication with the U.S. Department of Education or directly with ACICS soliciting endorsement of ACICS.

3. The MSCHE, through verbal communications with the Senior Department Official (SDO) with the U.S. Department of Education, inquired about the reference to MSCHE as one of the accrediting agencies referenced in the report. No written statements were provided to the U.S. Department of Education regarding this matter as the SDO indicated the reference was an editorial error and corrective actions would be taken.

4. The reference to the MSCHE as one of nine accreditors that endorsed ACICS was reported as an editorial error.

5. The MSCHE takes no position on such endorsements as that is beyond the scope of our agency's responsibilities.

Thank you for your interest in this matter. If you have additional questions or concerns, please contact me.

Sincerely,

Elizabeth H. Sibolski

Elizabeth H. Sibolski, Ph.D.
President

SACS COC™

SOUTHERN ASSOCIATION OF COLLEGES AND SCHOOLS
COMMISSION ON COLLEGES

October 25, 2018

The Honorable Elizabeth Warren
United States Senator

The Honorable Richard Blumenthal
United States Senator

The Honorable Sherrod Brown
United States Senator

The Honorable Richard J. Durbin
United States Senator

Dear Senators Warren, Blumenthal, Brown, and Durbin:

I am writing in response to your letter of October 18, 2018, regarding assertions of the Southern Association of Colleges and Schools Commission on Colleges' support for ACICS. I will respond to each of your numbered questions.

1. This organization has not, at any time, provided any written or verbal statements to the U.S. Department of Education, or to ACICS, regarding that agency's acceptance as an accreditor within the higher education community.

2. This organization has not been approached at any time by any person or entity soliciting our endorsement of ACICS.

3. The several presidents of the regional accrediting agencies, including myself, met in person with the Senior Designated Official (SDO) on the morning of October 3rd of this year. Among a number of other topics, we explicitly confirmed to her that our organizations had not provided any written or verbal endorsements of ACICS. She indicated that the reference to our endorsements was an editorial mistake and that she would make appropriate corrections.

4. I have no information regarding why my organization may have been referenced in the SDO's letter.

5. Endorsement of another accrediting agency is outside the scope of our responsibilities. Our understanding of §602.13 is that an accreditor must enjoy the wide acceptance of its member institutions and the constituencies they serve. We have not understood this to apply to other accrediting agencies.

I trust that this is responsive to your inquiries.

Sincerely,

Belle S. Wheelan

Belle S. Wheelan, Ph.D.
President

BSW:rb

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ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS | ABHES

7777 Leesburg Pike, Suite 314 N. · Falls Church, Virginia 22043
Tel. 703/917.9503 · Fax 703/917.4109 · E-Mail: info@abhes.org

October 25, 2018

The Honorable United States Senators
Elizabeth Warren, Richard Blumenthal, Sherrod Brown
and Richard J. Durbin
The United States Senate Committee
on Health Education Labor and Pensions
428 Senate Dirksen Office Building
Washington, DC 20510

Dear Senators Warren, Blumenthal, Brown and Durbin:

This letter is in response to your letter of October 15, 2018, to the Accrediting Bureau of Health Education Schools (ABHES). Your letter requests information and documentation regarding any formal or informal communication between ABHES and the United States Department of Education or the Accrediting Council of Independent Colleges and Schools (ACICS) related to a "letter of support" or "endorsement" that may have been requested by ACICS or provided by ABHES. We provide the following answers to the specific questions posed.

1. *Has your organization, between 2016 to 2018, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing ACICS as an accepted accreditor within the higher education community? If so, please provide copies of any such letters.*

   ABHES is recognized by the U.S. Department of Education as both an institutional accrediting agency for post-secondary institutions offering predominantly allied health education programs as well as a specialized programmatic accreditor for medical assisting, medical laboratory technology, and surgical technology programs. In December 2017, ABHES provided a letter to the U.S. Department of Education informing the Department that as a programmatic accreditor, ABHES accredits programs offered at institutions that are institutionally accredited by agencies that are recognized by the U.S. Department of Education or the Council on Higher Education Accreditation (CHEA). Institutional accreditation is a threshold requirement for programmatic eligibility. Once a program has been deemed eligible, and before it can receive ABHES accreditation, it must demonstrate that it meets ABHES' standards and other accreditation requirements. The December 2017 letter was intended to be a statement regarding continued eligibility for ACICS-accredited institutions that held or were seeking ABHES programmatic accreditation. This letter was provided after ABHES received a verbal request from ACICS for a letter of acceptance of ACICS Standards, Policies and Procedures. A copy of the letter ABHES provided to the Department and the proposed template letter provided following its request are attached.

2. *Has your organization, between 2016-2018, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?*

   ABHES has not had any other communication with the U.S. Department of Education or directly with ACICS soliciting ABHES' endorsement of ACICS.

3. *Has your organization provided verbal or written statements to the U.S. Department of Education disputing that you endorsed ACICS as an accepted accreditor within the higher education community? If so, please provide the statement.*

   ABHES has not provided verbal or written statements to the U.S. Department of Education disputing that ABHES endorsed ACICS as an accepted accreditor within the higher education community.

4. *Why do you believe the U.S. Department of Education referenced your organization as one of the nine accreditors that endorsed ACICS?*

   We do not know for certain why the U.S. Department of Education referenced ABHES but perhaps the Department may have viewed the ABHES statement regarding continuing programmatic eligibility as an endorsement.

5. *Do you endorse ACICS as a "widely accepted" accreditor? Why or why not?*

   It is not ABHES' practice to endorse other organizations.

Respectfully Submitted,

India Y. Tips

India Y. Tips
Interim Executive Director

Enclosures

C: Faina Dookh, Legislative Fellow, Office of Senator Elizabeth Warren

SAMPLE – 34 CFR 600.13(a)
Acceptance of ACICS Standards, Policies, Procedures and Decisions By Licensing Bodies

[Licensing Body Letterhead]

Herman Bounds Jr., Ed.S., Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
Accreditation Group
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Director Bounds:

I am writing to you on behalf of the Accrediting Bureau of Health Education Schools (ABHES) in Falls Church, VA. ABHES is a programmatic and institutional accreditor recognized by the US Department of Education (the Department) focusing on healthcare education and training. Its' approved and recognized scope includes degree and non-degree granting private, postsecondary institutions offering educational programs predominantly in allied health; and the programmatic accreditation of public and private medical assistant, medical laboratory technician, and surgical technology programs.

As a programmatic accreditor and reliable authority as determined by the Department, ABHES has accredited a number of programs at institutions accredited by the Accrediting Council for Independent Colleges and Schools (ACICS). While the campuses maintain institutional accreditation by ACICS; ABHES accreditation allows graduates of a Medical Assistant, Medical Laboratory Technology and/or Surgical Technology program the eligibility to sit for various credentialing exams in such fields.

Programs accredited by ABHES are subject to rigorous approval and continual reviews of the programs subject to our standards, policies, and procedures. [Based on my agency's review of ABHES accredited programs at ACICS accredited institutions, coupled with the licensure pass rates for the graduates from these programs; I can attest that the work of ACICS as an agency is valuable as evidenced by our review of the curriculum, instruction, and preparation of these ACICS programs.]

I can be reached at [phone or email] in connection with this letter of support.

Sincerely.

ACCREDITING BUREAU OF HEALTH EDUCATION SCHOOLS | ABHES

7777 Leesburg Pike, Suite 314 N. · Falls Church, Virginia 22043
Tel. 703/917.9503 · Fax 703/917.4109 · E-Mail: info@abhes.org

Herman Bounds Jr., Ed.S., Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
Accreditation Group
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Dr. Bounds:

I am writing to you on behalf of the Accrediting Bureau of Health Education Schools (ABHES). As you know, ABHES is recognized by the Department of Education to accredit post-secondary institutions offering predominantly health education programs through the master's degree level. ABHES is also recognized to accredit medial assistant, medical laboratory technician and surgical technology programs.

As a programmatic accreditor, ABHES accredits programs at colleges that are accredited institutionally by accrediting organizations recognized by the U.S. Department of Education and/or the Council on Higher Education Accreditation (CHEA). While institutional accreditation broadly assesses the soundness of a college's education and student services, because of its specific review of curriculum and the achievement of competencies, programmatic accreditation by ABHES permits graduates to be eligible to take credentialing examinations required for professional practice.

ABHES acknowledges the important role institutional accreditation, including by ACICS, plays in the continuous review of institutions that are also programmatically accredited by ABHES' for Medical Assistant, Medical Laboratory Technology and Surgical Technology programs. ABHES is aware of new initiatives ACICS has undertaken to strengthen its review process as described in its *Memoranda to the Field*.

I can be reached at (703) 917-9503 or FTate@abhes.org if additional information is required.

Sincerely,

Florence Tate

Florence Tate
Executive Director

United States Senate
WASHINGTON, DC 20510

November 13, 2018

Marsal P. Stoll
Chief Executive Officer
Accreditation Commission for Education in Nursing
3343 Peachtree Road NW, Suite 850
Atlanta, Georgia 30326

Dear Ms. Stoll:

We write to obtain information from you related to a recent statement issued by the U.S. Department of Education ("Department") that your organization provided a "letter of support" to the Accrediting Council of Independent Colleges and Schools (ACICS). [1]

We are deeply concerned about the Department's rationale for its recent recommendation to restore the federal recognition of ACICS. Two years ago, the Department derecognized ACICS because of "pervasive compliance problems"[2] in the midst of controversy about ACICS's questionable oversight of several deeply flawed for-profit colleges, including Corinthian Colleges and FastTrain College. ACICS sued to block this derecognition and, in April of this year, Secretary Betsy DeVos tentatively restored their recognition.[3] On September 28th, the Department's Senior Designated Official (SDO) recommended continuing ACICS's recognition, stating that ACICS met 19 out of 21 federal criteria, including the criteria that ACICS is "widely accepted" by the higher education community.[4]

The SDO originally reported that "ACICS provided letters of support from nine other accrediting agencies," and stated that "this support of ACICS as a peer …serves as important evidence of ACICS's wide acceptance." But *Politico* reported on October 4, 2018 that "many of those accreditors cited by the department…never submitted letters of support for ACICS."[5] In an October 3rd meeting with the Department, several of these accreditors expressed their concern about this misstatement. Eight of the nine accreditors have since confirmed that they have not sent anything to the Department or to ACICS.

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[1] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico Pro.* Published October 4, 2018 and updated October 5, 2018. https://www.politico.com/newsletters/morning-education/2018/10/05/education-dept-overstated-endorsements-of-for-profit-college-accreditor-363214

[2] Letter from former U.S. Department of Education Secretary John King to ACICS https://www2.ed.gov/documents/acics/final-acics-decision.pdf

[3] Letter from U.S. Department of Education Secretary Betsy DeVos to ACICS https://www2.ed.gov/documents/press-releases/acics-docketno-16-44-0.pdf

[4] Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, September 29, 2018 https://www.insidehighered.com/sites/default/server_files/media/SDO%20Response%20to%20ACICS%209.28.18.pdf

[5] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico.*

The Department called this misstatement "an inadvertent error in the editing process," and has since posted a correction.[6] The Department's correction cites letters of support from only one of the originally cited accrediting agencies, the Accrediting Bureau of Health Education Schools (ABHES), as well as from four other accrediting agencies, including yours: Accreditation Council for Occupational Therapy Education (ACOTE), Commission on Accreditation in Physical Therapy Education (CAPTE), Accreditation Commission for Education in Nursing (ACEN), and American Registry of Radiologic Technologists (ARRT). The planned correction states that, "Each of these is a widely accepted accreditor in its own right, and its support of ACICS as a peer in this highly scrutinized area serves as important evidence of ACICS's wide acceptance."[7]

Given the Department's previous failure to accurately characterize the views of other accreditors about ACICS, and the new correction that now cites your agency, we write to seek clarification about the precise nature of how you indicated your support of ACICS to the Department, and whether the Department is accurately characterizing your views.

We request that you provide any information and documentation regarding any formal or informal communication between your organization and the Department or ACICS related to this issue by November 19, 2018. We also request answers in writing to the following questions by November 19, 2018:

1. Has your organization, at any time after January 1, 2016, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing or supporting ACICS as an accepted accreditor within the higher education community?

    a. If so, please explain what prompted you to provide such a statement.
    b. Provide copies of any such letters or records related to any verbal or other statements, and indicate the dates they were sent.

2. Has your organization, at any time after January 1, 2016, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?
    a. If yes, how did your organization respond?
    b. Please provide a description of the nature of these communications.
    c. Please provide copies of any and all documents related to these communications.

3. Do you endorse or support ACICS as a "widely accepted" accreditor? Why or why not?

Thank you for your attention to this matter. Please contact Faina Dookh of Senator Warren's staff (202-224-5189) should you have any questions.

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[6] Correction to Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, Updated October 15, 2018, Page 24. https://www2.ed.gov/about/offices/list/ope/correctedresponsefinal.pdf
[7] Ibid.

Sincerely,

Elizabeth Warren
United States Senator

Richard Blumenthal
United States Senator

Sherrod Brown
United States Senator

Richard J. Durbin
United States Senator

United States Senate
WASHINGTON, DC 20510

November 13, 2018

Pamela Roberts, PhD
Chairwoman
Accreditation Council for Occupation Therapy Education
4720 Montgomery Lane, Suite 200
Bethesda, Maryland 20814

Dear Dr. Roberts:

We write to obtain information from you related to a recent statement issued by the U.S. Department of Education ("Department") that your organization provided a "letter of support" to the Accrediting Council of Independent Colleges and Schools (ACICS). [1]

We are deeply concerned about the Department's rationale for its recent recommendation to restore the federal recognition of ACICS. Two years ago, the Department derecognized ACICS because of "pervasive compliance problems"[2] in the midst of controversy about ACICS's questionable oversight of several deeply flawed for-profit colleges, including Corinthian Colleges and FastTrain College. ACICS sued to block this derecognition and, in April of this year, Secretary Betsy DeVos tentatively restored their recognition.[3] On September 28th, the Department's Senior Designated Official (SDO) recommended continuing ACICS's recognition, stating that ACICS met 19 out of 21 federal criteria, including the criteria that ACICS is "widely accepted" by the higher education community.[4]

The SDO originally reported that "ACICS provided letters of support from nine other accrediting agencies," and stated that "this support of ACICS as a peer …serves as important evidence of ACICS's wide acceptance." But *Politico* reported on October 4, 2018 that "many of those accreditors cited by the department…never submitted letters of support for ACICS."[5] In an October 3rd meeting with the Department, several of these accreditors expressed their concern about this misstatement. Eight of the nine accreditors have since confirmed that they have not sent anything to the Department or to ACICS.

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[1] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico Pro.* Published October 4, 2018 and updated October 5, 2018. https://www.politico.com/newsletters/morning-education/2018/10/05/education-dept-overstated-endorsements-of-for-profit-college-accreditor-363214

[2] Letter from former U.S. Department of Education Secretary John King to ACICS https://www2.ed.gov/documents/acics/final-acics-decision.pdf

[3] Letter from U.S. Department of Education Secretary Betsy DeVos to ACICS https://www2.ed.gov/documents/press-releases/acics-docketno-16-44-0.pdf

[4] Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, September 29, 2018 https://www.insidehighered.com/sites/default/server_files/media/SDO%20Response%20to%20ACICS%209.28.18.pdf

[5] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico.*

The Department called this misstatement "an inadvertent error in the editing process," and has since posted a correction.[6] The Department's correction cites letters of support from only one of the originally cited accrediting agencies, the Accrediting Bureau of Health Education Schools (ABHES), as well as from four other accrediting agencies, including yours: Accreditation Council for Occupational Therapy Education (ACOTE), Commission on Accreditation in Physical Therapy Education (CAPTE), Accreditation Commission for Education in Nursing (ACEN), and American Registry of Radiologic Technologists (ARRT). The planned correction states that, "Each of these is a widely accepted accreditor in its own right, and its support of ACICS as a peer in this highly scrutinized area serves as important evidence of ACICS's wide acceptance."[7]

Given the Department's previous failure to accurately characterize the views of other accreditors about ACICS, and the new correction that now cites your agency, we write to seek clarification about the precise nature of how you indicated your support of ACICS to the Department, and whether the Department is accurately characterizing your views.

We request that you provide any information and documentation regarding any formal or informal communication between your organization and the Department or ACICS related to this issue by November 19, 2018. We also request answers in writing to the following questions by November 19, 2018:

1. Has your organization, at any time after January 1, 2016, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing or supporting ACICS as an accepted accreditor within the higher education community?

    a. If so, please explain what prompted you to provide such a statement.
    b. Provide copies of any such letters or records related to any verbal or other statements, and indicate the dates they were sent.

2. Has your organization, at any time after January 1, 2016, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?
    a. If yes, how did your organization respond?
    b. Please provide a description of the nature of these communications.
    c. Please provide copies of any and all documents related to these communications.

3. Do you endorse or support ACICS as a "widely accepted" accreditor? Why or why not?

Thank you for your attention to this matter. Please contact Faina Dookh of Senator Warren's staff (202-224-5189) should you have any questions.

---

[6] Correction to Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, Updated October 15, 2018, Page 24. https://www2.ed.gov/about/offices/list/ope/correctedresponsefinal.pdf
[7] Ibid.

Sincerely,

Elizabeth Warren
United States Senator

Richard Blumenthal
United States Senator

Sherrod Brown
United States Senator

Richard J. Durbin
United States Senator

United States Senate
WASHINGTON, DC 20510

November 13, 2018

Paul A. Larson
Director
American Registry of Radiologic Technologists
1255 Northland Drive
St. Paul, Minnesota 55120

Dear Mr. Larson:

We write to obtain information from you related to a recent statement issued by the U.S. Department of Education ("Department") that your organization provided a "letter of support" to the Accrediting Council of Independent Colleges and Schools (ACICS). [1]

We are deeply concerned about the Department's rationale for its recent recommendation to restore the federal recognition of ACICS. Two years ago, the Department derecognized ACICS because of "pervasive compliance problems"[2] in the midst of controversy about ACICS's questionable oversight of several deeply flawed for-profit colleges, including Corinthian Colleges and FastTrain College. ACICS sued to block this derecognition and, in April of this year, Secretary Betsy DeVos tentatively restored their recognition.[3] On September 28th, the Department's Senior Designated Official (SDO) recommended continuing ACICS's recognition, stating that ACICS met 19 out of 21 federal criteria, including the criteria that ACICS is "widely accepted" by the higher education community.[4]

The SDO originally reported that "ACICS provided letters of support from nine other accrediting agencies," and stated that "this support of ACICS as a peer …serves as important evidence of ACICS's wide acceptance." But *Politico* reported on October 4, 2018 that "many of those accreditors cited by the department…never submitted letters of support for ACICS."[5] In an October 3rd meeting with the Department, several of these accreditors expressed their concern about this misstatement. Eight of the nine accreditors have since confirmed that they have not sent anything to the Department or to ACICS.

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[1] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico Pro.* Published October 4, 2018 and updated October 5, 2018. https://www.politico.com/newsletters/morning-education/2018/10/05/education-dept-overstated-endorsements-of-for-profit-college-accreditor-363214

[2] Letter from former U.S. Department of Education Secretary John King to ACICS https://www2.ed.gov/documents/acics/final-acics-decision.pdf

[3] Letter from U.S. Department of Education Secretary Betsy DeVos to ACICS https://www2.ed.gov/documents/press-releases/acics-docketno-16-44-0.pdf

[4] Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, September 29, 2018 https://www.insidehighered.com/sites/default/server_files/media/SDO%20Response%20to%20ACICS%209.28.18.pdf

[5] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico.*

The Department called this misstatement "an inadvertent error in the editing process," and has since posted a correction.[6] The Department's correction cites letters of support from only one of the originally cited accrediting agencies, the Accrediting Bureau of Health Education Schools (ABHES), as well as from four other accrediting agencies, including yours: Accreditation Council for Occupational Therapy Education (ACOTE), Commission on Accreditation in Physical Therapy Education (CAPTE), Accreditation Commission for Education in Nursing (ACEN), and American Registry of Radiologic Technologists (ARRT). The planned correction states that, "Each of these is a widely accepted accreditor in its own right, and its support of ACICS as a peer in this highly scrutinized area serves as important evidence of ACICS's wide acceptance."[7]

Given the Department's previous failure to accurately characterize the views of other accreditors about ACICS, and the new correction that now cites your agency, we write to seek clarification about the precise nature of how you indicated your support of ACICS to the Department, and whether the Department is accurately characterizing your views.

We request that you provide any information and documentation regarding any formal or informal communication between your organization and the Department or ACICS related to this issue by November 19, 2018. We also request answers in writing to the following questions by November 19, 2018:

1. Has your organization, at any time after January 1, 2016, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing or supporting ACICS as an accepted accreditor within the higher education community?

    a. If so, please explain what prompted you to provide such a statement.
    b. Provide copies of any such letters or records related to any verbal or other statements, and indicate the dates they were sent.

2. Has your organization, at any time after January 1, 2016, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?
    a. If yes, how did your organization respond?
    b. Please provide a description of the nature of these communications.
    c. Please provide copies of any and all documents related to these communications.

3. Do you endorse or support ACICS as a "widely accepted" accreditor? Why or why not?

Thank you for your attention to this matter. Please contact Faina Dookh of Senator Warren's staff (202-224-5189) should you have any questions.

---

[6] Correction to Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, Updated October 15, 2018, Page 24. https://www2.ed.gov/about/offices/list/ope/correctedresponsefinal.pdf
[7] Ibid.

Sincerely,

Elizabeth Warren
United States Senator

Richard Blumenthal
United States Senator

Sherrod Brown
United States Senator

Richard J. Durbin
United States Senator

United States Senate
WASHINGTON, DC 20510

November 13, 2018

Beth Marcoux
Chairwoman
Commission on Accreditation in Physical Therapy Education
1111 North Fairfax Street
Alexandria, Virginia 22314

Dear Ms. Marcoux:

We write to obtain information from you related to a recent statement issued by the U.S. Department of Education ("Department") that your organization provided a "letter of support" to the Accrediting Council of Independent Colleges and Schools (ACICS). [1]

We are deeply concerned about the Department's rationale for its recent recommendation to restore the federal recognition of ACICS. Two years ago, the Department derecognized ACICS because of "pervasive compliance problems"[2] in the midst of controversy about ACICS's questionable oversight of several deeply flawed for-profit colleges, including Corinthian Colleges and FastTrain College. ACICS sued to block this derecognition and, in April of this year, Secretary Betsy DeVos tentatively restored their recognition.[3] On September 28th, the Department's Senior Designated Official (SDO) recommended continuing ACICS's recognition, stating that ACICS met 19 out of 21 federal criteria, including the criteria that ACICS is "widely accepted" by the higher education community.[4]

The SDO originally reported that "ACICS provided letters of support from nine other accrediting agencies," and stated that "this support of ACICS as a peer …serves as important evidence of ACICS's wide acceptance." But *Politico* reported on October 4, 2018 that "many of those accreditors cited by the department…never submitted letters of support for ACICS."[5] In an October 3rd meeting with the Department, several of these accreditors expressed their concern about this misstatement. Eight of the nine accreditors have since confirmed that they have not sent anything to the Department or to ACICS.

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[1] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico Pro.* Published October 4, 2018 and updated October 5, 2018. https://www.politico.com/newsletters/morning-education/2018/10/05/education-dept-overstated-endorsements-of-for-profit-college-accreditor-363214

[2] Letter from former U.S. Department of Education Secretary John King to ACICS https://www2.ed.gov/documents/acics/final-acics-decision.pdf

[3] Letter from U.S. Department of Education Secretary Betsy DeVos to ACICS https://www2.ed.gov/documents/press-releases/acics-docketno-16-44-0.pdf

[4] Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, September 29, 2018 https://www.insidehighered.com/sites/default/server_files/media/SDO%20Response%20to%20ACICS%209.28.18.pdf

[5] Leonor, Mel. "Education Department overstated endorsements of for-profit college accreditor." *Politico.*

The Department called this misstatement "an inadvertent error in the editing process," and has since posted a correction.[6] The Department's correction cites letters of support from only one of the originally cited accrediting agencies, the Accrediting Bureau of Health Education Schools (ABHES), as well as from four other accrediting agencies, including yours: Accreditation Council for Occupational Therapy Education (ACOTE), Commission on Accreditation in Physical Therapy Education (CAPTE), Accreditation Commission for Education in Nursing (ACEN), and American Registry of Radiologic Technologists (ARRT). The planned correction states that, "Each of these is a widely accepted accreditor in its own right, and its support of ACICS as a peer in this highly scrutinized area serves as important evidence of ACICS's wide acceptance."[7]

Given the Department's previous failure to accurately characterize the views of other accreditors about ACICS, and the new correction that now cites your agency, we write to seek clarification about the precise nature of how you indicated your support of ACICS to the Department, and whether the Department is accurately characterizing your views.

We request that you provide any information and documentation regarding any formal or informal communication between your organization and the Department or ACICS related to this issue by November 19, 2018. We also request answers in writing to the following questions by November 19, 2018:

1. Has your organization, at any time after January 1, 2016, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing or supporting ACICS as an accepted accreditor within the higher education community?

    a. If so, please explain what prompted you to provide such a statement.
    b. Provide copies of any such letters or records related to any verbal or other statements, and indicate the dates they were sent.

2. Has your organization, at any time after January 1, 2016, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?
    a. If yes, how did your organization respond?
    b. Please provide a description of the nature of these communications.
    c. Please provide copies of any and all documents related to these communications.

3. Do you endorse or support ACICS as a "widely accepted" accreditor? Why or why not?

Thank you for your attention to this matter. Please contact Faina Dookh of Senator Warren's staff (202-224-5189) should you have any questions.

---

[6] Correction to Letter from Diane Auer Jones, Deputy Under Secretary of Education, to ACICS, Updated October 15, 2018, Page 24. https://www2.ed.gov/about/offices/list/ope/correctedresponsefinal.pdf
[7] Ibid.

Sincerely,

Elizabeth Warren
United States Senator

Richard Blumenthal
United States Senator

Sherrod Brown
United States Senator

Richard J. Durbin
United States Senator

November 14, 2018

United States Senate
Washington, DC 20510

Senators Warren, Durbin, Blumenthal and Brown:

The Accreditation Council for Occupational Therapy Education (ACOTE©) did send a letter to Director Herman Bounds, Jr. of USDE on December 20, 2017explaining the relationship that ACOTE had with the Accrediting Council for Independent Colleges and Schools (ACICS).

ACOTE is recognized by the U.S. Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA) as the accrediting agency for occupational therapy education. ACOTE currently accredits over 500 occupational therapy and occupational therapy assistant educational programs in the United States and its territories, which at the time included programs offered by institutions accredited by ACICS. During that timeframe, ACICS was recognized by CHEA, and met ACOTE Standards.

According to 2011 Standard A.1.1. under Sponsorship and Accreditation, ACOTE requires institutions sponsoring occupational therapy and occupational therapy assistant programs to be institutionally accredited by a regional and/or national accrediting agency recognized by USDE **and/or** CHEA. Even though ACICS lost their USDE recognition on December 12, 2016, ACOTE continued to recognize ACICS as an institutional accreditor and to accredit programs accredited by ACICS because they were still recognized by CHEA. *See* ACOTE Policies and Procedures Manual, Section II., at pp. 3 & 43. Since that time, ACOTE has had no other correspondence with ACICS or USDE related to the matter concerning ACICS.

Currently, ACOTE accredits fours schools that housed in ACICS institutions. If you have additional questions regarding this matter, I can be reached at ssalvant@aota.org.

Regards,

Sabrina Salvant, EdD, MPH, OTR/L
Director of Accreditation
Accreditation Council for Occupational Therapy

Exhibit 11.2

Accreditation Council for Occupational Therapy Education
American Occupational Therapy Association, Inc.
4720 Montgomery Lane, Suite 200, Bethesda, MD 20814-3449
P: (301) 652-2682 • F: (240) 762-5140 • E: accred@aota.org

December 20, 2017

Herman Bounds Jr., Ed.S., Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
Accreditation Group
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Director Bounds:

I am writing to you on behalf of the Accreditation Council for Occupational Therapy Education (ACOTE) of the American Occupational Therapy Association. ACOTE is recognized by the U.S. Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA) as the accrediting agency for occupational therapy education. ACOTE currently accredits over 400 occupational therapy and occupational therapy assistant educational programs in the United States and its territories, including programs offered by institutions accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

ACICS is recognized by CHEA, and is accepted by ACOTE as an institutional accrediting agency. Specifically, ACOTE requires an institution sponsoring an occupational therapy or occupational therapy assistant program to be institutionally accredited by a regional and/or national accrediting agency recognized by the USDE and/or CHEA to accredit postsecondary educational institutions. *See* ACOTE Manual, Section II., at pp. 2 & 42.

I can be reached at bostrove@aota.org in connection with this letter.

Sincerely.

Barbara L Ostrove

Barbara Ostrove, MA, OTR/L, FAOTA
Assistant Director of Accreditation

Email from ACICS to ACOTE: December 18, 2017

From: Summers, Joshua E. [mailto:JESummers@duanemorris.com]
Sent: Monday, December 18, 2017 6:33 PM
To: Neil Harvison
Cc: Barbara Ostrove
Subject: ACICS

Mr. Harvison:

I am writing to you on behalf of the Accrediting Council for Independent Colleges and Schools (ACICS). ACICS is an institutional accrediting agency that is seeking recognition from the U.S. Department of Education (USDOE). In connection with the recognition process, ACICS is required to demonstrate that its institutional accreditation is accepted by others in the United States.

According to the ACOTE programmatic accreditation manual, one of the eligibility requirements for ACOTE accreditation is that the institution be institutionally accreditation by an accrediting agency recognized by the USDOE or the Council for Higher Education Accreditation (CHEA). ACICS is recognized by CHEA. Also, there are some ACICS-accredited institutions that are currently programmatically accredited by ACOTE.

We ask that the AOTA confirm in writing that ACICS accreditation is sufficient for purposes of meeting the ACOTE institutional accreditation requirement. Please let me know at your earliest convenience whether you are able to accommodate this request.

Your time and assistance are greatly appreciated.

Sincerely,

Joshua E. Summers
Associate

Duane Morris LLP
750 B Street, Suite 2900
San Diego, CA 92101-4681
P: +1 619 744 2266
F: +1 619 923 2502

jesummers@duanemorris.com
www.duanemorris.com

[ACOTE Letter in response to congressional inquiry]

November 19, 2018

United States Senate
Washington, DC 20510

Ms. Dookh:
As we have noted, ACOTE has a 2011 Standard A.1.1. under Sponsorship and Accreditation regarding accreditation of institutions that apply for accreditation of an occupational therapy program. This policy states that ACOTE requires institutions sponsoring occupational therapy and occupational therapy assistant programs to be institutionally accredited by a regional and/or national accrediting agency recognized by USDE **and/or** CHEA. Consequently, ACOTE accredits four occupational therapy assistant programs that are housed in ACICS institutions. ACOTE makes no separate judgment of ACICS beyond accepting the CHEA recognition. We do not interpret the "widely accepted" standard, in 34 CFR 602.13. ACOTE is not in the position to judge if another accreditation agency is "widely accepted" as defined in federal law and regulation.

We appreciate the Committee's interest in assuring quality accreditation for both institutions and programs. We are happy to work with the Committee to further explore concerns and means to improve our educational systems. If you have additional questions/concerns regarding this matter, I can be reached at ssalvant@aota.org.

Regards,

Sabrina Salvant, EdD, MPH, OTR/L
Director of Accreditation

Exhibit 12.1

1111 North Fairfax Street
Alexandria, VA 22314-1488
703 684 2782
703 684 7343 fax
www.apta.org

November 19, 2018

The Honorable Elizabeth Warren
The Honorable Richard Blumenthal
The Honorable Sherrod Brown
The Honorable Dick Durbin
United States Senate
Washington, DC 20510

Dear Senators Warren, Blumenthal, Brown, and Durbin:

Thank you for your letter dated November 13, 2018, regarding the Commission on Accreditation in Physical Therapy Education (CAPTE) and the Accrediting Council of Independent Colleges and Schools (ACICS). CAPTE is a department of the American Physical Therapy Association (APTA) and is an accrediting agency that is nationally recognized by the US Department of Education and the Council for Higher Education Accreditation. CAPTE grants specialized accreditation status to qualified entry-level education programs for physical therapists and physical therapist assistants. Currently, more than 32,000 physical therapist students and 12,000 physical therapist assistant students attend CAPTE-accredited programs.

Your letter asked if CAPTE provided statements to the Department of Education regarding ACICS. As you will see from the enclosed letter, CAPTE wrote to Herman Bounds on December 22, 2017, stating: "Please accept this letter as acknowledgement by CAPTE that programs sponsored by ACICS-accredited institutions satisfy the CAPTE's requirements for physical therapist assistant programs." This letter is CAPTE's only communication with the Department of Education on this topic and was crafted in response to an email from Joshua E. Summers, associate with Duane Morris, LLP. A copy of this email is attached.

Thank you for reaching out to CAPTE. CAPTE has been recognized as an independent agency since 1977 and has been the only recognized agency to accredit physical therapy programs since 1983. CAPTE is an active member of the Association of Specialized and Programmatic Accreditors (ASPA) and subscribes to the ASPA Code of Good Practice. Please contact Katy Neas, APTA's executive vice president of public affairs, at katyneas@apta.org or 703/706-3324 if you require additional information.

Sincerely,

Sharon L Dunn

Sharon L. Dunn, PT, PhD
Board-Certified Clinical Specialist in Orthopaedic Physical Therapy
President

CAPTE
COMMISSION ON ACCREDITATION IN PHYSICAL THERAPY EDUCATION

1111 NORTH FAIRFAX STREET
ALEXANDRIA, VIRGINIA 22314
TELEPHONE: (703) 706-3245
FAX: (703) 684-7343
ACCREDITATION@APTA.ORG
WWW.CAPTEONLINE.ORG

December 22, 2017

Herman Bounds Jr., Ed.S., Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
Accreditation Group
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Accrediting Council for Independent Colleges and Schools (ACICS)

Dear Director Bounds:

I am writing to you on behalf of the Commission on Accreditation in Physical Therapy Education (Commission or CAPTE) of the American Physical Therapy Association. The Commission is recognized by the United States Department of Education (USDE) to accredit entry-level physical therapist and physical therapist assistant education programs. The Commission accredits programs on the basis of the program's compliance with the Standards and Required Elements for Accreditation of Physical Therapist Assistant Education Programs, which provide, "3B The sponsoring institution(s) is (are) accredited by an agency or association recognized by the US Department of Education (USDE) or by the Council for Higher Education Accreditation (CHEA)."

The Accrediting Council for Independent Colleges and Schools (ACICS) is recognized by CHEA. Institutional accreditation by ACICS meets the CAPTE institutional accreditation requirement. Please accept this letter as acknowledgement by CAPTE that programs sponsored by ACICS-accredited institutions satisfy the CAPTE's requirements for physical therapist assistant programs.

I can be reached at 703-706-3240 or sandrawise@apta.org in connection with this letter.

Sincerely,

Sandra Wise

Digitally signed by Sandra Wise
DN: cn=Sandra Wise, o, ou, email=sandrawise3@gmail.com, c=US
Date: 2017.12.22 11:31:28 -05'00'

Sandra Wise, Senior Director
Commission on Accreditation in Physical Therapy Education

cc: Michelle Edwards, President and Chief Executive Officer, ACICS

Neas, Katy

From: Neas, Katy
Sent: Thursday, November 15, 2018 1:21 PM
To: Neas, Katy
Subject: FW: ACICS - request for letter of support
Attachments: CAPTE-2017-12-20-ACICS-Letter-Support-duane-morris-edits-bennett_capte.doc

From: Summers, Joshua E. <JESummers@duanemorris.com>
Sent: Monday, December 18, 2017 8:42 PM
To: Wise, Sandra
Subject: ACICS

Dear Ms. Wise:

I am writing to you on behalf of the Accrediting Council for Independent Colleges and Schools (ACICS). ACICS is an institutional accrediting body that is seeking recognition from the U.S. Department of Education (USDOE). In connection with the recognition process, ACICS is required to demonstrate that its institutional accreditation is accepted by others in the United States.

According to the CAPTE accreditation manual, one of the eligibility requirements for CAPTE programmatic accreditation is that the institution be institutionally accredited by an accrediting agency recognized by either the USDOE or the Council for Higher Education Accreditation (CHEA). ACICS is recognized by CHEA.

We ask that CAPTE confirm in writing that ACICS accreditation is sufficient for purposes of meeting the CAPTE institutional accreditation requirements. Further, we would appreciate a letter in support of ACICS's application for recognition, similar to the attached draft, confirming that ACICS accreditation is sufficient for purposes of CAPTE programmatic accreditation.

Please let me know at your earliest convenience whether you are able to accommodate this request.

Your time and assistance are greatly appreciated.

Sincerely,

Joshua E. Summers
Associate

Duane Morris LLP
750 B Street, Suite 2900
San Diego, CA 92101-4681
P: +1 619 744 2266
F: +1 619 923 2502

jesummers@duanemorris.com
www.duanemorris.com

[Accredit\2017 ACICS\CAPTE-2017-12-20-ACICS-Letter-Support-Letter-duane-morris-edits-bennett_capte]

SAMPLE – 34 CFR 602.13(a)
Acceptance of ACICS Standards, Policies, Procedures and Decisions By Licensing Bodies

[CAPTE Letterhead]

Herman Bounds Jr., Ed.S., Director
Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
Accreditation Group
400 Maryland Avenue, SW
Washington, D.C. 20202

Re: Accrediting Council for Independent Colleges and Schools (ACICS)

Dear Director Bounds:

I am writing to you on behalf of the Commission on Accreditation in Physical Therapy Education (Commission or CAPTE) of the American Physical Therapy Association. The Commission is recognized by the United States Department of Education (USDE) to accredit entry-level physical therapist and physical therapist assistant education programs. The Commission accredits programs for physical therapists on the basis of the program's compliance with the Standards and Required Elements for Accreditation of Physical Therapist Education Programs, which provide, "3B The sponsoring institution(s) is (are) accredited by a **regional** accrediting agency recognized by the US Department of Education (USDE) or by the Council for Higher Education Accreditation (CHEA)." The Commission accredits programs for physical therapist assistants on the basis of the program's compliance with the Standards and Required Elements for Accreditation of Physical Therapist Assistant Education Programs, which provide, "3B The sponsoring institution(s) is (are) accredited by an agency or association recognized by the US Department of Education (USDE) or by the Council for Higher Education Accreditation (CHEA)".

The Accrediting Council for Independent Colleges and Schools (ACICS) is recognized by CHEA. institutional accreditation by ACICS meets the CAPTE institutional accreditation requirement.

Please accept this letter as acknowledgement by CAPTE that programs sponsored by ACICS-accredited institutions satisfy the CAPTE's requirements for both physical therapist and physical therapist assistant programs.

I can be reached at [phone or email] in connection with this letter.

Sincerely.

Sandra Wise, Senior Director
Commission on Accreditation in Physical Therapy Education

cc: Michelle Edwards, President and Chief Executive Officer, ACICS

THE AMERICAN REGISTRY OF RADIOLOGIC TECHNOLOGISTS®

November 19, 2018

Senator Elizabeth Warren
United States Senate
317 Hart Senate Office Building
Washington D.C. 20510

Senator Richard Blumenthal
United States Senate
706 Hart Senate Office Building
Washington D.C. 20510

Senator Sherrod Brown
United States Senate
317 Hart Senate Office Building
Washington D.C. 20510

Senator Richard Durbin
United States Senate
711 Hart Senate Office Building
Washington D.C. 201510

Dear Senators Warren, Brown, Blumenthal, and Durbin:

This letter is in response to your letter dated November 13, 2018 addressed to Dr. Paul Larson, President of the American Registry of Radiologic Technologists (ARRT). That letter requested information from ARRT regarding any communications from this organization endorsing the Accrediting Council of Independent Colleges and Schools (ACICS). Based upon a search of ARRT files, ARRT's responses to your specific questions are as follows:

1. Has your organization, at any time after January 1, 2016, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing or supporting ACICS as an accepted accreditor within the higher education community? If so, please explain what prompted you to provide such a statement. Provide copies of any such letters or records related to any verbal or other statements, and indicate the dates they were sent.

   ARRT Response: A search of ARRT files identified the attached letter of January 18, 2018 from ARRT to ACICS. The letter was generated in response to a request from ACICS. The letter states ARRT's criteria for recognizing educational accreditors (i.e., recognition by the U.S. Department of Education or recognition by the Council for Higher Education Accreditation (CHEA)) and notes that since ACICS was recognized by CHEA, it was included in the list of accreditors recognized by ARRT.

2. Has your organization, at any time after January 1, 2016, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS? If yes, how did your organization respond? Please provide a description of the nature of these communications. Please provide copies of any and all documents related to these communications.

ARRT Response: The email string between Michelle Edwards, President and Chief Executive Officer of ACICS, and Jerilyn Powell, ARRT's Director of Educational Requirements, that led to the letter referenced in ARRT's response to Question #1 is attached.

3. Do you endorse or support ACICS as a "widely accepted" accreditor? Why or why not?

   ARRT Response: ARRT certifies and registers individual technologists meeting ARRT standards for education, ethics, and examination. One of the standards for education is successful completion of an educational program accredited by a mechanism acceptable to ARRT. Those accreditation mechanisms recognized by either the U.S. Department of Education or the Council for Higher Education Accreditation are deemed mechanisms acceptable to ARRT. ARRT does not make statements regarding how "widely accepted" a particular accreditor is and limits its communications to factual statements of its policy as illustrated in the letter provided in response to Question #1.

Sincerely,

Jerry B. Reid
Executive Director
The American Registry of Radiologic Technologists (ARRT)

cc: Faina Dookh, Legislative Fellow, Office of Senator Elizabeth Warren
Paul Larson, M.D., President of the American Registry of Radiologic Technologists (ARRT)
Jim Lynch, Dorsey & Whitney
Eric Grier, Ph.D., Director of Government Affairs, ARRT

January 18, 2018

Michelle Edwards
President and Chief Executive Officer
Accrediting Council for Independent Colleges and Schools
Suite 980
750 First Street NE
Washington, DC 20002

Dear Ms. Edwards:

The *American Registry of Radiologic Technologists® (ARRT®) Rules and Regulations* require that candidates for certification and registration through the primary eligibility pathway must have successfully completed a formal education program accredited by a mechanism acceptable to the ARRT and must complete the ARRT Didactic and Clinical Competency Requirements as part of the educational program. Accrediting agencies for institutions or programs within the United States that provide the professional education must be recognized by the United Stated Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA) as an accrediting agency; and if such recognition is as a specialized accrediting agency, has a scope that includes radiologic technology or allied health.

The Accrediting Council for Independent Colleges and Schools (ACICS) is currently recognized by CHEA and accepted by ARRT as an accrediting mechanism. ARRT records indicate ACICS was first recognized by ARRT in 2015 and that recognition has been continuous since the initial recognition as a result of ACICS maintaining CHEA recognition. For the current recognition status refer to the ARRT website.

If we can be of further assistance, do not hesitate to contact me at 651-681-3184.

Sincerely,

J.J. Powell, MSAS, R.T.(R)(S)(ARRT), RDMS, RVT
Director of Educational Requirements

#2

Jerilyn Powell

From: Michelle Edwards <medwards@acics.org>
Sent: Wednesday, December 27, 2017 11:50 AM
To: Jerilyn Powell
Subject: Fwd: ACICS Recognition by ARRT January 27 2015.pdf
Attachments: ACICS Recognition by ARRT January 27 2015.pdf; ATT00001.htm

Good Afternoon JJ:

I hope you had a wonderful holiday!

Were you able to provide an updated letter confirming our recognition by ARRT?

I look forward to your response.

Michelle

Michelle Edwards

Begin forwarded message:

> **From:** Michelle Edwards <medwards@acics.org>
> **Date:** December 18, 2017 at 3:12:24 PM CST
> **To:** "jerilyn.powell@arrt.org" <jerilyn.powell@arrt.org>
> **Subject: ACICS Recognition by ARRT January 27 2015.pdf**
>
> Hello JJ!
>
> Thank you so much for responding to my voice mail seeking clarification of our status with ARRT. Attached is the most recent letter we have on file. Anything additional you can provide would be helpful.
>
> Thanks,
> Michelle
>
> **Michelle Edwards**
> President and CEO
> **Accrediting Council for Independent Colleges and Schools**
> 750 First Street, NE | Suite 980 | Washington, DC 20002
> www.acics.org | 202.336.6780 - p | 202.842.2593 - f
>
>

#3

Jerilyn Powell

From: Michelle Edwards <medwards@acics.org>
Sent: Wednesday, December 27, 2017 3:43 PM
To: Jerilyn Powell
Subject: Fwd: ACICS Letter of Support
Attachments: image001.jpg; ATT00001.htm; image002.jpg; ATT00002.htm; image003.jpg; ATT00003.htm; image004.jpg; ATT00004.htm; image005.jpg; ATT00005.htm; image006.jpg; ATT00006.htm; image007.jpg; ATT00007.htm; image008.jpg; ATT00008.htm; image009.jpg; ATT00009.htm; ACICS Letter of Support_12202017.pdf; ATT00010.htm

Categories: ED REQ

Thank you again for taking the time to look for any additional communications.

Would ARRT be able to provide something similar as attached; which we received from ACEN?

Michelle Edwards

Begin forwarded message:

> **From:** Jessica Dermody <JDermody@acenursing.org>
> **Date:** December 20, 2017 at 10:49:57 AM CST
> **To:** "medwards@acics.org" <medwards@acics.org>
> **Cc:** Marsal Stoll <MStoll@acenursing.org>
> **Subject: ACICS Letter of Support**
>
> Good morning Ms. Edwards,
>
> Sending attached letter on behalf of Dr. Stoll. Hard copy of letter will also be mailed to you for your records.
>
> Please let me know if you have any questions or if I may be of further assistance.
>
> Best regards,
>
> **Jessica Dermody**
> **Executive Assistant to the CEO**

ACEN™
Accreditation Commission for Education in Nursing

December 20, 2017

Herman Bounds Jr., E.Ds.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Director Bounds:

This letter of support is on behalf of the Accrediting Council for Independent Colleges and Schools (ACICS).

ACEN is recognized by the U.S. Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). As you know, the purpose of ACEN is to provide specialized accreditation for all types of nursing education programs, including clinical doctorate/DNP specialist certificate programs, master's/post-master's certificate programs, baccalaureate programs, associate programs, diploma programs, and practical programs. ACEN accredits nursing education programs in secondary, postsecondary, and hospital-based governing organizations that offer certificates, diplomas, or degrees, including nursing education programs offered by governing organizations accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

ACICS is CHEA recognized and accepted by ACEN as an institutional accrediting agency. ACEN historical records date the acceptance of ACICS by the ACEN to at least 2008 and this acceptance continues to the present - http://www.acenursing.net/manuals/Policies.pdf, page 8. One specific ACEN eligibility requirement is a governing organization sponsoring a nursing education program accredited by ACEN must be institutionally accredited by an ACEN recognized institutional accrediting agency.

As a CHEA recognized accreditor, ACICS currently meets the institutional accrediting agency criteria for ACEN specialized accreditation. In turn, ACEN or CCNE specialized accreditation is a requirement for nursing education programs in Alabama, Alaska, Colorado, Delaware, Florida, Georgia, Hawaii, Maine, Minnesota, Mississippi, Nevada, New Hampshire, Rhode Island, Utah, Vermont, Virginia, Wisconsin, Illinois, Washington, and the District of Columbia. While specialized accreditation is not required by other states, many nursing education programs in those states hold specialized accreditation.

I can be reached at 404-975-5000 or mstoll@acenursing.org if you have any questions.

Sincerely,

Marsal P. Stoll, EdD, MSN
Chief Executive Officer

Cc: Michelle Edwards
President, ACICS

Jerilyn Powell

4

From: Jerilyn Powell
Sent: Wednesday, December 27, 2017 1:51 PM
To: 'Michelle Edwards'
Subject: RE: ACICS Recognition by ARRT January 27 2015.pdf

Michelle,

Sorry I have not responded sooner. I have been through the files of two previous directors and I do not believe a letter providing an update was sent in the fall of 2015. I was able to find a copy of the letter from February 2015.

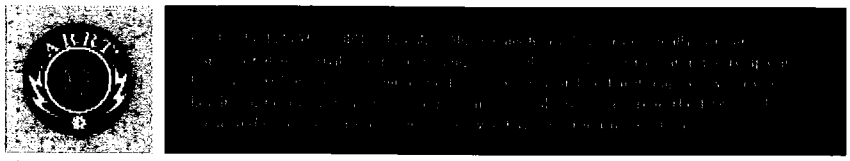
As you know ARRT still lists ACICS on our website as an approved accreditation mechanism for programs at this time. Do you need something additional from me at this time beyond our website?

Regards,

J.J. Powell, M.S.A.S., R.T.(R)(S)(ARRT), RDMS, RVT

DIRECTOR, EDUCATION REQUIREMENTS
THE AMERICAN REGISTRY OF RADIOLOGIC TECHNOLOGISTS®

DIRECT PHONE **651.681.3184** | *FAX* **651.681.3299** | *MAIN PHONE* **651.687.0048**
1255 NORTHLAND DRIVE, ST. PAUL, MN 55120
WWW.ARRT.ORG



From: Michelle Edwards [mailto:medwards@acics.org]
Sent: Wednesday, December 27, 2017 11:50 AM
To: Jerilyn Powell <Jerilyn.Powell@arrt.org>
Subject: Fwd: ACICS Recognition by ARRT January 27 2015.pdf

Good Afternoon JJ:

I hope you had a wonderful holiday!

Were you able to provide an updated letter confirming our recognition by ARRT?

I look forward to your response.

Michelle

———————

Michelle Edwards

Begin forwarded message:

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Date: December 18, 2017 at 3:12:24 PM CST
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Subject: ACICS Recognition by ARRT January 27 2015.pdf

Hello JJ!

Thank you so much for responding to my voice mail seeking clarification of our status with ARRT. Attached is the most recent letter we have on file. Anything additional you can provide would be helpful.

Thanks,
Michelle

Michelle Edwards
President and CEO
Accrediting Council for Independent Colleges and Schools
750 First Street, NE | Suite 980 | Washington, DC 20002
www.acics.org | 202.336.6780 - p | 202.842.2593 - f

(5)

January 2, 2018

Michelle Edwards
President and Chief Executive Officer
Accrediting Council for Independent Colleges and Schools
Suite 980
750 First Street NE
Washington, DC 20002

Dear Ms. Edwards:

The *American Registry of Radiologic Technologists® (ARRT®) Rules and Regulations* require that candidates for certification and registration through the primary eligibility pathway must have successfully completed a professional educational program that has specialized accreditation and/or is housed within an institution that is accredited by an agency recognized by ARRT. Accrediting agencies for institutions or programs within the United States that provide the professional education must be recognized by the United Stated Department of Education (USDE) or the Council for Higher Education Accreditation (CHEA) as an accrediting agency; and if such recognition is as a specialized accrediting agency, has a scope that includes radiologic technology or allied health.

The Accrediting Council for Independent Colleges and Schools (ACICS) is currently recognized by CHEA and accepted by ARRT as an accrediting mechanism. As of the date of this letter, ARRT records indicate ACICS was first recognized by ARRT in 2015 and that recognition has been continuous since the initial recognition as a result of ACICS maintaining CHEA recognition.

If we can be of further assistance, do not hesitate to contact me at 651-681-3184.

Sincerely,

J.J. Powell, MSAS, R.T.(R)(S)(ARRT), RDMS, RVT
Director of Educational Requirements

(6)

Jerilyn Powell

From: Jerilyn Powell
Sent: Thursday, January 18, 2018 1:42 PM
To: Michelle Edwards
Subject: RE: ACICS Letter of Support
Attachments: Accrediting Agency Confirmation Letter - V4_Final.pdf

Michelle,

I have worked with my executive team and the attached letter is being supplied to provide clarity to ACICS's current recognition with ARRT. A hardcopy of this letter will go in the mail today as well.

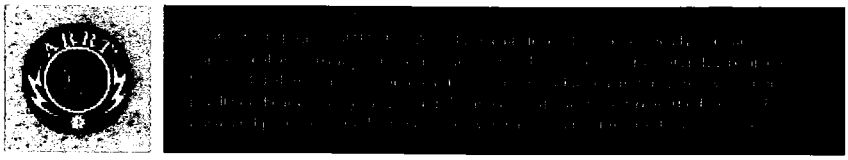
Hopefully this letter will provide you with the support needed.

Regards,

J.J. Powell, M.S.A.S., R.T.(R)(S)(ARRT), RDMS, RVT

DIRECTOR, EDUCATION REQUIREMENTS
THE AMERICAN REGISTRY OF RADIOLOGIC TECHNOLOGISTS®

DIRECT PHONE **651.681.3184** | *FAX* **651.681.3299** | *MAIN PHONE* **651.687.0048**
1255 NORTHLAND DRIVE, ST. PAUL, MN 55120
WWW.ARRT.ORG



From: Michelle Edwards [mailto:medwards@acics.org]
Sent: Wednesday, December 27, 2017 3:43 PM
To: Jerilyn Powell <Jerilyn.Powell@arrt.org>
Subject: Fwd: ACICS Letter of Support

Thank you again for taking the time to look for any additional communications.

Would ARRT be able to provide something similar as attached; which we received from ACEN?

Michelle Edwards

Begin forwarded message:

> **From:** Jessica Dermody <JDermody@acenursing.org>
> **Date:** December 20, 2017 at 10:49:57 AM CST
> **To:** "medwards@acics.org" <medwards@acics.org>
> **Cc:** Marsal Stoll <MStoll@acenursing.org>
> **Subject: ACICS Letter of Support**
>
> Good morning Ms. Edwards,

Sending attached letter on behalf of Dr. Stoll. Hard copy of letter will also be mailed to you for your records.

Please let me know if you have any questions or if I may be of further assistance.

Best regards,

Jessica Dermody
Executive Assistant to the CEO

ACEN™
Accreditation Commission for Education in Nursing

November 15, 2018

Senator Richard Blumenthal
706 Hart Senate Office Building
Washington, DC 20510

Senator Sherrod Brown
713 Hart Senate Office Building
Washington, DC 20510

Senator Richard Durbin
711 Hart Senate Office Building
Washington, DC 20510

Senator Elizabeth Warren
317 Hart Senate Office Building
Washington, DC 20510

Dear Senators Blumenthal, Brown, Durbin and Warren:

This letter is in response to your letter dated November 13, 2018 requesting information about the Accrediting Council for Independent Colleges and Schools (ACICS).

1. Has your organization, at any time after January 1, 2016, provided verbal or written statements to the U.S. Department of Education or directly to ACICS endorsing or supporting ACICS as an accepted accreditor within the higher education community?

   Answer: Yes.

   a. If so, please explain what prompted you to provide such a request.

      Answer: Requested by ACICS.

   b. Provide copies of any such letters or records related to any verbal or other statements, and indicate the dates they were sent.

      Answer: See attached letter dated December 20, 2017.

2. Has your organization, at any time after January 1, 2016, had any other communications with the U.S. Department of Education or directly with ACICS soliciting your endorsement of ACICS?

   Answer: No.

   a. If yes, how did your organization respond?

      Answer: Not applicable per answer to question #2.

b. Please provide a description of the nature of these communications.

Answer: Not applicable per answer to question #2.

c. Please provide copies of any and all documents related to these communications.

Answer: Not applicable per answer to question #2.

3. Do you endorse or support ACICS as a "widely accepted" accreditor? Why or why not?

Answer: Yes. See attached letter dated December 20, 2017.

Sincerely,

Marsal P. Stoll, EdD, MSN
Chief Executive Officer

Attachment

ACEN™
Accreditation Commission
for Education in Nursing

December 20, 2017

Herman Bounds Jr., E.Ds.
Director, Accreditation Group
U.S. Department of Education
Office of Postsecondary Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Director Bounds:

This letter of support is on behalf of the Accrediting Council for Independent Colleges and Schools (ACICS).

ACEN is recognized by the U.S. Department of Education (USDE) and the Council for Higher Education Accreditation (CHEA). As you know, the purpose of ACEN is to provide specialized accreditation for all types of nursing education programs, including clinical doctorate/DNP specialist certificate programs, master's/post-master's certificate programs, baccalaureate programs, associate programs, diploma programs, and practical programs. ACEN accredits nursing education programs in secondary, postsecondary, and hospital-based governing organizations that offer certificates, diplomas, or degrees, including nursing education programs offered by governing organizations accredited by the Accrediting Council for Independent Colleges and Schools (ACICS).

ACICS is CHEA recognized and accepted by ACEN as an institutional accrediting agency. ACEN historical records date the acceptance of ACICS by the ACEN to at least 2008 and this acceptance continues to the present - http://www.acenursing.net/manuals/Policies.pdf, page 8. One specific ACEN eligibility requirement is a governing organization sponsoring a nursing education program accredited by ACEN must be institutionally accredited by an ACEN recognized institutional accrediting agency.

ACEN

As a CHEA recognized accreditor, ACICS currently meets the institutional accrediting agency criteria for ACEN specialized accreditation. In turn, ACEN or CCNE specialized accreditation is a requirement for nursing education programs in Alabama, Alaska, Colorado, Delaware, Florida, Georgia, Hawaii, Maine, Minnesota, Mississippi, Nevada, New Hampshire, Rhode Island, Utah, Vermont, Virginia, Wisconsin, Illinois, Washington, and the District of Columbia. While specialized accreditation is not required by other states, many nursing education programs in those states hold specialized accreditation.

I can be reached at 404-975-5000 or mstoll@acenursing.org if you have any questions.

Sincerely,

Marsal P. Stoll, EdD, MSN
Chief Executive Officer

Cc: Michelle Edwards
President, ACICS

ACEN™
Accreditation Commission for Education in Nursing

November 16, 2018

Faina Dookh
Legislative Fellow
Office of Senator Elizabeth Warren
317 Hart Senate Office Building
Washington, DC 20510

Dear Ms. Dookh:

This letter is in response to your email dated November 15, 2018 in which you requested additional information.

1. In your response, you state that ACICS requested that you provide a statement. Can you please provide any draft letters or solicitation that ACICS provided to you as part of this request by them?

   Answer: The request was through a telephone conversation with Michelle Edwards, ACICS CEO. There are no draft letters.

2. Are there any other reasons, other than that ACICS is recognized by CHEA, that you support ACICS?

   Answer: The letter dated December 20, 2017 clearly explains the reason for the letter of support from ACEN.

Sincerely,

Marsal P. Stoll, EdD, MSN
Chief Executive Officer

Exhibit 15: SDO's "Planned Correction"

CORRECTED TEXT:

ACICS's support is not just from its own accredited institutions. In its 2018 Supplement, ACICS provides additional letters of support from educators who are familiar with the standards and criteria of nine other accrediting bodies as well as those of ACICS to reinforce that ACICS's standards, policies and procedures are in line with those of other recognized accreditors. Exhibit B-O-8 - B-O-11 (Excel chart matching letters of support with accrediting agencies). Some of these letters were written by former ACICS member institutions that were forced to seek new accreditation (a costly proposition) from a new accreditor as a result of the Department's decision derecognizing ACICS, which would normally make an institution even more critical of its former accreditor. Yet, these individuals continue to support ACICS. These institutions represent a wide geographic diversity, thereby meeting the Department's standards for educator and institution support. In fact, this evidence far exceeds the Department's requirements for providing evidence of wide acceptance among educators and institutions in 34 CFR § 602.13(a).

In its supplemental materials, ACICS also provides letters of support from five other accrediting agencies, including ACOTE, CAPTE, ABHES, ACEN, and ARRT. See Exhibits B-O-41 - B-O-45. Each of these is a widely accepted accreditor in its own right, and its support of ACICS as a peer in this highly scrutinized area serves as important evidence of ACICS's wide acceptance.