



Accrediting Commission of Career Schools and Colleges

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## ACCSC ACCREDITATION ALERT

**To:** ACCSC Accredited Institutions and Other Interested Parties  
**From:** Michale S. McComis, Ed.D., Executive Director  
**Date:** July 1, 2024  
**Subject:** Call for Nominations, Notice and Guidance, and Revisions to the ACCSC *Standards of Accreditation*

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### Announcements/Reminders:

- Call for Nominations - ACCSC Commission
- Call for Nominations - ACCSC Nominating Committee

### Notice and Guidance - UPDATE

- Update to the Commission’s April 17, 2024 Notice and Guidance regarding Program Modification Implementation

### Revisions to the *Standards of Accreditation*:

#### Chapter 1 – Rules of Process and Procedure

*Section I (A)(18)*  
*Section I (H)(1)(c)*  
*Section I (K)(2)*  
*Section XI (B)(3)(g)*

**Changes Related to  
Signature Requirements**

*Section I (B)(2)*  
*Section VII (K)*  
*Section VII (L)*  
*Section V (A)*  
*Section V (E)(2)(i)*

#### Chapter 2 – Substantive Standards

*Section IV (A)(4 & 13)*  
*Section VII (A)(3)(c)(i)*  
*Appendix II – Applications, Reports, Forms, & Instructions*  
*Appendix IV – Recruitment and Advertising*  
*Appendix V – Admissions Documentation*  
*Appendix VII – Guidelines for Employment Classification*

**Changes Related to  
Signature Requirements**

### Bylaws Revision

#### **Section 4.02 – Checks, Notes, and Contracts**

All revisions set forth herein are effective January 1, 2024 and will be added to the republished version of the [\*Standards of Accreditation\*](#) dated July 1, 2024 replacing the previous version. For additional information related to this Accreditation Alert, please contact Michale S. McComis, Ed.D., Executive Director, at 703.247.4520 or [mccomis@accsc.org](mailto:mccomis@accsc.org).

### **Call for Nominations to Serve as an ACCSC Commissioner**

On behalf of the Accrediting Commission of Career Schools and Colleges (ACCSC) and in accordance with the organizational *Bylaws*, the ACCSC Nominating Committee seeks nominations of potential candidates to serve on the ACCSC Board of Directors as a Commissioner.

During this nomination cycle, the ACCSC Nominating Committee is charged with filling the following four (4) upcoming vacancies on the Commission:

- Three School Commissioners each elected for a four-year term beginning July 1, 2025 and ending June 30, 2029; and
- One Public Commissioner appointed for a four-year term beginning July 1, 2025 and ending June 30, 2029.

A ***School Commissioner*** is a person who:

- i. Is a proprietor, owner, or bona fide executive of a member of the Corporation as described in Section 2.01 hereof that has been accredited by ACCSC for at least five years;
- ii. Has at least five years of ownership or bona fide executive experience in an ACCSC-accredited school, has participated in at least one full accreditation process with an ACCSC-accredited school, and is active in school operations;
- iii. Has a past record demonstrating:
  1. A commitment to providing quality education to students;
  2. A commitment to ethical, fair, and honest practice; and
  3. Compliance with accrediting standards and applicable federal, state, and local requirements.

A ***Public Commissioner*** is a person who:

- i. Has experience in industry, government, education (e.g., accreditation, postsecondary, public, private, adult or vocational/career-oriented), or in similar or allied fields;
- ii. Is not an employee, member of the governing board, owner, shareholder, or consultant of an institution that is accredited by the Commission, has applied for accreditation by the Commission, or is affiliated with a School Commissioner or any institution or entity which is also affiliated with a School Commissioner;
- iii. Is not a member of any trade association or membership organization related to, affiliated with, or associated with ACCSC;
- iv. Is not a spouse, parent, child, or sibling of an individual identified in paragraph (ii) or (iii) of this definition.

The Commission shall not have among its membership more than one (1) School Commissioner affiliated with a single member of the Corporation or multiple members of the Corporation under common ownership and control.

The Nominating Committee in nominating candidates and the Commission in appointing Commissioners will, amongst other factors, give consideration to:

1. A nominee's:
  - a. Background, level of experience, and knowledge regarding accreditation, postsecondary education, industry, and Board governance;

- b. Affiliation with any school that has lost or been denied accreditation by any accrediting agency, been issued a Warning or Probation by any accrediting agency, entered into bankruptcy, or closed;<sup>1</sup>
  - c. Involvement in criminal proceedings and any pending or past action (e.g., investigation, inquiry, etc.) in a judicial, law enforcement, or administrative body; and
  - d. Performance and commitment with respect to:
    - i. Providing quality education to students;
    - ii. Ethical, fair, and honest practice; and
    - iii. Compliance with accrediting standards and applicable federal, state, and local requirements;
2. Any comments provided by the Executive Director; and
  3. The Commission's goal to achieve a diversity of backgrounds, experiences, and perspectives in order to achieve the purposes of the Corporation.

Nominees should submit the [Call for Nominations to the Commission Part I & Part II](#) accompanied by a current résumé **on or before October 4, 2024.**

### **Call for Nominations to the Nominating Committee**

The ACCSC Nominating Committee – the committee responsibly for finding and vetting candidates to serve on the ACCSC Board of Directors/Accrediting Commission – has two vacancies which need to be filled for the 2025 fiscal year. The Nominating Committee typically meets 2-3 times virtually and once in person for minimally 2 days to participate in Commissioner candidate interviews.

Individuals interested in standing for election to the ACCSC Nominating Committee should complete the Call for Nomination Form and return it to the Commission no later than **July 15, 2024.** Minimally, the Commission will select two qualified individuals who are not affiliated with any sitting Commissioner to run for election to fill the two vacant seats on the Nominating Committee.

The individual that receives the most votes will be elected to serve the two-year term ending June 30, 2026. The individual that receives the second most votes will be elected to serve the one-year term ending June 30, 2025.

Nominees must submit the [Nominating Committee Call for Nominations](#) by **July 15, 2024.**

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<sup>1</sup> The Nominating Committee may not process a nomination from a candidate whose school (to include any affiliated school within a group) which would be the source of eligibility to serve as a School Commissioner is or within the preceding five years has been subject to an ACCSC-issued Probation or is or within the preceding 12 months has been subject to an ACCSC-issued Warning (see *Section 1.09.b.iv* of the AACSC Bylaws).

**UPDATE to the Commission’s April 17, 2024 Notice and Guidance regarding Program Modification Implementation**

On [April 17, 2024](#), ACCSC issued Guidance regarding the U.S. Department of Education’s revisions to the federal regulations surrounding “gainful employment” programs. Based on recent court developments, ACCSC schools will have until January 15, 2025 to implement any Non-Substantive or Substantive Program Modifications approved by the Commission that were made in response to the Federal Regulations outlined in the Commission’s [April 17, 2024 Guidance](#).

Any approved program modification not implemented by January 15, 2025 will require the submission of a new Program Modification-Nonsubstantive Modification or the Application for Substantive Modification, as applicable, to revert to the previous version of the program. If the school applied and has not yet received approval for a modification, the school may request that the application be rescinded. Of note, the Commission’s directory will reflect the most recently approved program modifications unless a new Program Modification-Nonsubstantive Modification or Application for Substantive Modification is submitted.<sup>2</sup>

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<sup>2</sup> A copy of the application can be found on the ACCSC Website under [Forms and Reports](#).

**Revisions to the Standards of Accreditation**  
**Signature Definition and Rules**

Over time, expectations for what constitutes a “signature” or “signing” a document has changed given advances in technology and the acceptance of other forms of acknowledgement, particularly in electronic format. Taking these types of changes into account the Commission conducted a review of the *Standards of Accreditation* for areas where signatures are required. The Commission then considered the merit of in-person (e.g., “wet”) signatures versus electronic signatures, current practices by institutions and students, the availability of various forms and formats that support electronic/virtual means of acknowledgment and acceptance, and the requirements of governmental entities in similar circumstances.

The Commission concluded that changes to the *Standards of Accreditation* with regard to signatures may be useful to schools and students while at the same time maintaining the Commission’s expectations of disclosure, acceptance, and acknowledgment that an in-person signature may imply. The Commission issued a Call for Comment dated May 17, 2024 and all of the comments received supported the Commission’s proposed revisions.

Accordingly, the Commission has included a definition of “signature” when used in the context of ACCSC’s accreditation standards. Of paramount importance is that a school can show meaningful interaction that supports and allows students to fully understand that which they are acknowledging and/or accepting. As schools will see in the revisions, although the words “sign,” “signed,” or “signature” may have mostly been removed, the expectations for full disclosure and express acknowledgement and/or agreement are in no way diminished. Moreover, the Commission will continue to require verifiable electronic forms of signatures for submissions that attest to accuracy and truthfulness or which agree to the terms of the Application for Accreditation. Lastly, the Commission is also making conforming revisions to ACCSC’s forms and applications, however, that project will take some time to complete fully.

New language is in **Red, Bold, and Italicized** print.

Deleted language is in ~~blue strikethrough~~.

*Section I (A)(18), Rules of Process and Procedure, Standards of Accreditation:*

18. ***The term “sign(ed/ing/ature)” means agreeing to, attesting to, acknowledging, accepting, or certifying a document/process/action in a physical or electronic form/format. Any use of electronic signatures must be enforceable, reliable, and used in accordance with applicable state and federal requirements.***

***Renumber 19.-20.***

*Section I (H)(1)(c), Rules of Process and Procedure, Standards of Accreditation:*

General Instructions – Submission of Documents to the Commission

- c. Identified with the school’s ACCSC reference number and include a ~~signed~~ certification ***statement*** attesting to the accuracy of the information;

*Section I (K)(2), Rules of Process and Procedure, Standards of Accreditation:*

Requests for Information

2. A request for information from the Commission by a school or other entity with standing to make such a request must submit ***in writing*** the request ~~on letterhead signed~~ by the appropriate official with authority to make the request.

**Section XI (B)(3)(g), Rules of Process and Procedure:**

**B. Pilot Project Application**

- g. A certification statement, **signed** by the applicant or its authorized representative, that the information included in the application for a pilot project is true and correct.

**Section IV (A)(4 & 13), Substantive Standards:**

**A. Recruitment**

4. The school's code of conduct is in writing, includes, minimally, all elements set forth in *Appendix IV, Substantive Standards, Standards of Accreditation*, is **signed accepted** and dated by the individual employee, and a copy of which is maintained in the individual's personnel file.

**Section VII (A)(3)(c)(i), Substantive Standards:**

3. Leave of Absence

- i. The period of the leave of absence may not begin until the student has submitted and the school has approved a written **and signed** request for an approved leave of absence except in those cases where unforeseen circumstances would prevent a student from submitting a request in advance.

**Appendix II – Applications, Reports, Forms, & Instructions, Substantive Standards:**

Applications, reports, and forms submitted for Commission review must be complete, accurate, **signed certified** by the school's chief executive officer, and filed in a timely manner.

**Appendix IV – Recruitment and Advertising, Substantive Standards:**

The Code of Conduct must be in writing and **signed accepted**, minimally, by all school personnel whose primary duties include student recruitment and admissions functions.

**Appendix V – Admissions Documentation, Substantive Standards:**

Under these circumstances, the student must **sign a statement attesting** that he or she in fact obtained a high school diploma or its equivalent and state the reason(s) why documentation of the earned credential cannot be provided.

**Appendix VII – Guidelines for Employment Classification, Substantive Standards:**

a. Regular Employment

- iii. In cases where a school can show diligent efforts have been made to secure such written documentation without success, the school maintains documentation of verbal verification that includes the following:
  2. **An attestation signature** of school staff **attesting as** to verbal employment verification with the employer and the date of verification; and
  3. **An attestation signature** of school staff **attesting as** to verbal employment verification with the graduate and the date of verification.

b. Self-Employment

The school secures written documentation from the self-employed graduate verifying that the employment is valid including, at a minimum, a statement **signed** by the graduate which includes the following...

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In conformance with federal regulations, ACCSC has added the following provisions to the *Rules of Process and Procedure, Standards of Accreditation* concerning teach-out plans and agreement.

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

### **B. Purpose and Scope**

2. *Authority: Pursuant Section 1.02 of the Bylaws, the Commission has the right to promulgate, after notice to and comment from the members of the Corporation, the Standards of Accreditation. The Commission also has the right to adopt and apply processes and procedures for accreditation. This authority is expressed in the establishment of the Rules of Process and Procedures and the Substantive Standards as well as corresponding forms, applications, reports, time frames, submission requirements, and fees associated with the requirements established herein.*

*Renumber 3.-6.*

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In order to ensure the accuracy of a school's file and record with ACCSC, the Commission has added or revised the following notification provisions.

## **SECTION V – ANNUAL REPORTING AND REQUIRED NOTIFICATIONS**

### **A. General Requirements**

4. *Changes in a school's Director or Chief Executive Officer must be communicated to the Commission in writing within 10 calendar days of the change.*

### **E. Notification Reports**

2. Material events or circumstances necessitating such notification include but are not limited to:
  - i. Any action ~~against the school~~ *by the U.S. Department of Education* to limit, suspend, or terminate ~~student loan guarantees or the school's~~ participation in ~~in external programs by a guaranty agency or the U.S. Department of Education~~ *student federal financial programs; to provisionally certify the school for participation in student federal financial programs; or to place the school on any form of financial monitoring (e.g., Heightened Cash Monitoring);*

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In order to ensure that accuracy of information provided to students when a school is placed on Warning or Probation, the Commission has made the following revisions to the *Rules of Process and Procedure*,

## SECTION VII – COMMISSION ACTIONS

### K. Warning

7. *Within a timeframe set forth in the Warning notification, the Commission may require the school subject to a Warning Order to:*
  - a. Inform current and prospective students in writing that the school has been placed/continued on Warning and *to provide such notice on the school's website;*
  - b. Provide a summary *of that accurately describes* the reasons for the Warning Order; and
  - c. *Provide the uniform resource locator (URL) where the Commission's summary of the Warning can be obtained from the Commission website.*

### L. Probation

7. *A school subject to Probation must w*~~A school subject to Probation must w~~*Within seven days of receipt of the Probation notification and for the duration of that action, a*~~The~~ *school must:*
  - a. Inform current and prospective students in writing that the school has been placed/continued on Probation *and provide such notice on the school's website;*
  - b. Provide a summary *of that accurately describes* the reasons for the Probation; and
  - c. *Provide the uniform resource locator (URL) indicate* where that action can be obtained from the Commission's website.

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## Bylaws

The proposal as put forth in the February 20, 2024 Accreditation Alert to amend the bylaws in the following area has passed by a vote of the members and those revisions are in effect and now included in the July 1, 2024 Standards of Accreditation, Bylaws of the Accrediting Alliance of Career Schools and Colleges (dba ACCSC).

- **Section 4.02 – Checks, Notes, and Contracts**