



# ACCREDITING COUNCIL FOR INDEPENDENT COLLEGES AND SCHOOLS

## MEMORANDUM TO THE FIELD

**TO:** ACICS-Accredited Institutions and Other Interested Parties  
**FROM** Accrediting Council for Independent Colleges and Schools  
**DATE:** January 10, 2014

The Memorandum to the Field contains final criteria, proposed criteria and other information for ACICS-Accredited Institutions and Other Interested Parties

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## 1. Final Criteria Revisions

At its December 2013 meeting, the Council reviewed specific areas of the ACICS *Accreditation Criteria* outlined in Section I. The language contained in Section I was previously reviewed by ACICS constituents or reflects a clarification of previously approved criteria.

The Council has updated the respective sections of the *Accreditation Criteria* to reflect all final criteria revisions. To obtain a current copy of the *Accreditation Criteria*, please visit our Web site at [www.acics.org](http://www.acics.org). The *Accreditation Criteria* can be found in the **Publications** section of the Web site.

The following criteria were previously reviewed and, unless otherwise noted, have been accepted as **final, effective immediately** (new language is underlined, ~~deleted language is struck~~):

### A. Title II, Chapter 2 – Institutional Changes *Explanation of Proposed Changes*

*The Council approved final language to strengthen and clarify its expectations of institutions that initiate substantive changes to their programs and operations, and to better align ACICS standards with federal regulations. The changes below in sections 2-2-101 through 2-2-507 primarily pertain to implementation of programs at a higher credential level, or programs out of scope with the current grant of accreditation, or being delivered for the first time through a non-traditional delivery method.*

## CHAPTER 2 INSTITUTIONAL CHANGES

### INTRODUCTION

Approval by ACICS is required before substantive changes are implemented, and institutions should notify ACICS of other significant changes. The material in this chapter explains the evaluation procedures that ACICS will follow for approving substantive and non- substantive changes.

~~The Council shall be notified immediately of substantive changes at an institution, including changes in its mission or objectives, management, ownership, control, educational programs, mode of delivery, name, geographic location, and state or local authority to operate, any of which may result in a comprehensive review by the Council.~~

### 2-2-100 – ADDITIONAL CAMPUS ACTIVITY SUBSTANTIVE CHANGES

2-2-101. *Initiation of Additional Campus Activity List of Substantive Changes.* The following institutional changes will be considered substantive and require Council approval before they can be included in the institution's scope of accreditation:

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- (a) Any change in the established mission or objectives of the institution as described in Standard 2-2-103;
- (b) Any change in the legal status, form of control, or ownership of the institution as described in Section 2-2-400;
- (c) The addition of programs that are considered to be out-of-scope. Programs considered out-of-scope are those that represent a significant departure from existing programs that were offered when the agency last evaluated the institution as described in Standard 2-2-105;
- (d) The addition of courses or programs that represent a significant departure from the existing delivery method utilized when the agency last evaluated the institution as described in Standard 2-2-106;
- (e) The addition of programs of study at a degree or credential level different from that which is included in the institution's current scope of accreditation as described in Standard 2-2-107;
- (f) A change from clock hours to credit hours as described in Standard 2-2-108;
- (g) 25% or greater increase in the number of clock or credit hours awarded for successful completion of a program as described in Standard 2-2-109;
- (h) The acquisition of any other institution or any program or location of another institution;
- (i) The addition of a permanent location at a site at which the institution is conducting a teach-out for students of another institution that has ceased operating before all students have completed their program of study;
- (j) The entering into a contract under which an institution or organization not certified to participate in the Title IV, HEA programs offers more than 25 percent of one or more of the accredited institution's educational programs as described in Standard 2-2-505; and
- (k) The establishment of an additional location geographically apart from the main campus at which the institution offers at least 50 percent of an educational program as described in Standard 2-2-104.

**2-2-102. Effect of Extensive Substantive Changes.** The Council shall conduct a comprehensive on-site evaluation of the institution if substantive changes that have been made or are proposed are sufficiently extensive that the institution's capacity to maintain compliance with accreditation standards requires an immediate assessment. Substantive changes are defined by Council as "extensive" when the types and/ or number of changes are so substantial that the nature and scope of the accredited institution will no longer be the same since last evaluated and in its place a new institution has evolved.

**2-2-103. Change of Institutional Mission.** It is the responsibility of the institution to secure approval from the Council prior to implementing any change in the mission or objectives of the institution.

**2-2-101 2-2-104. Initiation of Additional Campus Activity.** An additional activity includes any ongoing instructional activity offered at a site away from the main facility of an institution. Activity at a site that meets the Council's definition of an "Additional Location" is described in Section 1-3-100, Classification of Campuses. Activity at a site that does not meet the definition of an Additional Location is referred to below as a "Campus Addition." Reporting requirements are as follows:

- (a) *Additional Location.* It is the responsibility of the institution to secure approval from ACICS of the intention to initiate an additional location before the location begins classes. If approved, activity must be initiated at the additional location within one year of the proposed start date. An additional location must be approved by the Council before advertising, recruiting, and enrollment may take place. Failure to secure approval from ACICS prior to the initiation of an additional location may call into question the accreditation of the institution.

The institution shall provide, on Council forms, the rationale for initiation of the additional location and other information about the educational programs, credentials to be awarded, faculty, learning resources, physical and financial resources, strength in supporting fields, admission and graduation requirements, compliance with state law and authority to operate, number of students, and administrative arrangements. An acceptable catalog which identifies the additional location also shall be included as part of the application.

The Council will monitor the number of additional location applications submitted for each main campus and main campuses under common ownership based on a demonstration of sound administrative and financial capabilities. The Council reserves the right to limit the number of additional locations based on its review of demonstrated administrative and financial capabilities.

Any institution which (1) is required to submit a financial improvement plan to the Financial Review Committee, or which (2) is under a deferral action by the Council must request and receive prior permission from ACICS for the initiation of any additional locations. An institution under a show-cause directive, a negative action, or in a probation status will not receive approval from ACICS for the initiation of any additional location while the action is in effect.

- (b) *Campus Addition.* It is the responsibility of the institution to secure approval from ACICS prior to initiation of any new educational activity which is under the direct control of the on-site administration of a main campus or additional location and at a site that is apart from the primary location of that campus. In addition, if that activity involves 50% or more of an academic program, the campus addition must be approved by the Council before advertising, recruiting, and enrollment may take place. If approved, activity must be initiated at the campus addition within one year of the proposed start date. The institution shall provide, on Council forms, the location of the activity, its educational purpose, the programs offered, the number of students involved, and any

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additional information ACICS may request. A catalog for the campus which identifies the campus addition also shall be included as part of the application.

Any institution which has a campus that (1) is under review by the Financial Review Committee of ACICS, (2) shows either a net loss or a negative net worth on its most recent financial report, (3) is required to report placement and/or retention data to the Institutional Effectiveness Committee, or (4) is under a deferral action by the Council must request and receive prior permission from ACICS for the initiation of any additional campus activity at which 50% or more of an academic program is provided. An institution under a show-cause directive, a negative action, or in a probation status will not receive approval for the initiation of any such additional campus activity while the action is in effect.

**2-2-105. Addition of Programs Out of Scope.** It is the responsibility of the institution to secure approval from the Council of the intention to initiate the addition of programs that represent a significant departure or are out of scope from existing educational programs that were offered when the agency last evaluated the institution.

The institution or campus must initiate the approval process through the submission of a new program application and required documents for Council review and approval before being included in the institution's scope of accreditation.

**2-2-106. Initiation of Distance Education (Online) or New Instructional Delivery Method.** It is the responsibility of the institution to secure approval from the Council of the intention to initiate online delivery if all courses and programs within the institution are currently approved for residential or face-to-face instructional delivery method. Any significant change in instructional delivery method requires prior Council approval.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation information for Council review and approval before being included into the institution's current scope of accreditation.

**2-2-107. Expansion of Program Offerings to Higher Credential Level.** It is the responsibility of the institution to secure approval from the Council of the intention to initiate a program at a higher credential level.

The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation.

**2-2-108. Initiation of Change from Clock to Credit Hour Offering.** It is the responsibility of the institution to secure approval from the Council of the intention to initiate a change from clock to credit hours in its program offering through the submission of an application and required documentation.

**2-2-109. Increasing the Number of Clock or Credit Hours.** It is the responsibility of the institution to secure approval from the Council of the intention to initiate an increase of 25 percent or greater in the number of clock or credit hours awarded. If the percentage is less than 25 percent but results in a change in the credential level, the credential level will be evaluated to be within the institution's scope of accreditation.

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The institution or campus must initiate the approval process through the submission of a new program application and required documentation for Council review and approval before being included into the institution's scope of accreditation.

**2-2-102. 2-2-110. Evaluation, of Additional Campus Activity Approval and Monitoring of Substantive Change Activity.** All activity for which approval is sought will be evaluated by ACICS before approval is granted. Following is a description of those evaluations.

- (a) *Additional Location.* Initial inclusion of an additional location within the scope of the accreditation of the institution may be granted by the President upon receipt of all required information. An institution proposing the initiation of a new location must follow the procedures as outlined by the Council and disclosed on its Web site. A new location must receive initial inclusion before advertising, recruiting, or enrolling students at the proposed location. The Council reserves the right to require a preliminary visit to any potential additional location prior to the granting of initial inclusion.

An additional location that is granted initial inclusion by the President will be required to undergo a verification visit within six months after the initial class start date. Following this visit, the Council may require the additional location to submit additional information to satisfy areas of concern identified during the evaluation.

A decision regarding the final inclusion of an additional location will be made by the Council in full session following a visit by an evaluation team. Prior to the final inclusion visit, the chief on-site administrator of the location will be required to attend an Accreditation Workshop and to submit additional documentation as outlined and disclosed on the ACICS Web site. The evaluation will normally be scheduled for twelve to eighteen months after the initial class start date and will be conducted by a team of evaluators determined by the size of the institution, the type and number of programs being offered, and other special circumstances. Identification of significant deficiencies during the verification or final inclusion visits can result in an immediate show-cause directive to the institution.

Only after a determination of acceptability, either at the initial or final inclusion level, and notification to the institution of the decision, may the institution consider an additional location to be included within the scope of the institution's grant of accreditation. If approval is withheld, the withholding may be treated as a deferral or a denial, based on circumstances, and the institution may exercise its due process rights as outlined in Title II, Chapter 3.

- (b) *Campus Addition.* The President is authorized to evaluate and approve additions to a main or additional locations that are apart from the primary location of that campus. Educational activities at a campus addition are eligible to be evaluated for inclusion within the scope of the accreditation of the managing campus

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provided that the campus addition has been established to meet a specific educational need or condition and is authorized by the appropriate governmental education authority, if applicable.

The managing campus proposing the initiation of a campus addition must submit a Campus Addition Application. The managing campus must assure the Council that the educational activities at the campus addition complement the overall objectives of the institution. Based on its review of the application materials, ACICS may (1) grant final inclusion of the campus addition or (2) deny the application.

A campus addition that is granted final inclusion by the President will be required to undergo a verification visit within six months after the initial class start date if 50% or more of a program will be offered at the site. Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

All additions to the campuses of an institution are evaluated during an institution's regular evaluation for a renewal of accreditation.

- (c) *New Programs of Study.* Changes to an institution's scope of accreditation resulting from the proposed initiation of a new program of study, must be approved by the Council following a comprehensive review of supporting materials specific to the substantive change. Only upon approval of the substantive change to the institution's scope of accreditation is the institution or campus authorized to advertise, recruit and enroll students for the new program.

To further monitor the institution or campus which initiated the substantive change to the institution's scope of accreditation, an on-site evaluation visit will be conducted as directed by the Council.

Following this visit, the Council may require the institution to submit additional information to satisfy areas of concern identified during the evaluation.

### **2-2-120 – INITIATION AND EVALUATION OF CHANGES WITHIN THE CURRENT SCOPE**

All programs and delivery methods must be within the institution's scope of accreditation and receive ACICS approval before recruiting or enrolling students. Programs offered by the institution are appropriately evaluated during the institution's initial grant of accreditation and renewal of accreditation evaluations.

The initiation of a new program, or a change in the overall objective of a currently approved program or in the credential level of an existing program requires approval prior to implementation. The initiation of courses and programs offered via an online modality also requires approval prior to implementation. An application form and any additional documentation specified by ACICS must be submitted. Programs that have not started within one year of the proposed start date and programs that have been inactive for at least three years must be surrendered as defined in Section 2-2-505. *Termination of Programs.* Institutions or

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campuses must have demonstrated compliance with ACICS standards at a lower credential level before requesting a new program at a higher credential level.

Any institution or campus on interim reporting to the Financial Review Committee may be required to obtain prior permission from ACICS for the initiation of any new program. Any institution or campus under a compliance warning, a show-cause directive, a negative action, or in a probation status must obtain prior approval to apply for a new program. Additionally, any institution or campus subject to a comprehensive on-site evaluation as a result of extensive substantive changes must obtain prior permission from ACICS for the initiation of any new program.

**2-2-121. Changes to Existing Programs.** Changes to existing or currently approved programs fall under (a) extensive changes and (b) non-substantive changes.

- (a) Extensive Changes. An extensive change to existing program application process must be initiated and approval received prior to implementation. Failure to do so will result in a show-cause action for offering an unapproved program. The following changes will be considered substantive changes to the institution's scope of accreditation and require approval per Section 2-2-100 Substantive Changes:
- i. A 25% increase in the number of clock or credit hours awarded for successful completion of an existing program.
  - ii. a change from clock hours to credit hours
- (b) Non-substantive Changes. These include minor changes to existing programs which do not substantially alter the scope, objectives and nature of the programs as described in Standard 2-2-151.

**2-2-103. 2-2-122. Substantial Changes to Nonmain Campus Operations.** Prior notification to ACICS is required when an institution decides to make substantial changes to the operation of a nonmain-campus. Notice shall be made in writing to the President, who is authorized to act on behalf of ACICS in approving such changes.

Failure to notify and receive approval prior to substantial change of activity may call into question the accreditation of the institution, and further evaluation may be required.

**2-2-151. Non-Substantive Program Changes.** Institutions and campuses are required to notify the Council of all non-substantive changes to existing programs. Changes in the program name, clock/contact hours, credits awarded or program length will be disclosed to the public via the ACICS Web site. The following non-substantive changes will be acknowledged:

- (a) Less than 25% change in existing contact hours; credits awarded, curriculum content (courses offered), or program length of a currently approved program within a twelve month period.
- (b) A change in the name of an existing program that does not change the overall objective of the program.
- (c) A change from semester to quarter credit hours or vice versa.



**2-2-152. Non-Substantive Changes to Campus Operations.** As a condition for maintaining its accreditation status, the institution is expected to keep ACICS informed of changes affecting campus operations.

**2-2-200 –REDESIGNATION OF CAMPUSES**

**2-2-201. Additional Location-to-Main Campus Reclassification.** An additional location is eligible for evaluation as the freestanding main campus of a separately accredited, single campus institution only if it has been operating as an approved location for at least two years. Additional locations seeking main campus status must submit the appropriate application, audited financial statements certified by an independent certified public accountant for the institution's most recent fiscal year, and undergo an on-site evaluation visit. The visit will not occur until audited financial statements are received.

**2-2-202. Reassignment and Consolidation of Campuses.** Institutions seeking to reassign the classification of a campus or campuses or to consolidate groups of campuses must submit the appropriate application and documentation, including the rationale to the Council. The Council will consider the institution's requested grant expiration date for the newly formed group of campuses and assign modified or full-team evaluation visits as necessary to bring the grant lengths of the various groups of campuses into alignment. The scope and timing of these visits will be based on the length of the grant of accreditation for each group being reassigned or consolidated, as well as a review of determining factors such as retention and placement rates, reporting status, complaints and adverse and any other pertinent information. No campus will be given an extension of its current grant longer than one year for purposes of the consolidation, and new campuses moving through the additional location inclusion process will be visited as part of that process, regardless of the consolidation proposal. The Council reserves the right to assign an on-site evaluation visit at either the main campus or additional locations at any time as it deems necessary.

**2-2-203. Designation of Centrally Controlled Institution.** An institution may apply for classification as a centrally controlled institution by submitting an application and attachments on forms provided by the Council. Upon review of these materials, an evaluation visit will be conducted at one or more administrative sites and designated campuses to verify the information submitted and assess the eligibility of the institution for this classification. A full report will be submitted to the Council for review and approval.

**2-2-300 – CLOSING OF A CAMPUS**

In all instances of termination of activity at either main or nonmain campuses, ACICS must be assured that provision is made for presently enrolled students to complete the program of instruction for which they have enrolled, either at that institution or at another acceptable institution. In addition, ACICS must be assured that student academic transcripts are safely stored and protected and that the transcripts will be accessible to students and alumni indefinitely. ACICS and the appropriate regulatory agency must be notified of the arrangements made in this regard.

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**2-2-301. Closing of a Main Campus.** An institution is required to notify ACICS as far in advance as possible when it plans to cease operation. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The institution's grant of accreditation will be revoked as of the effective date of closing.

When ACICS receives information from any source that an institution has ceased to operate, it shall immediately take steps to verify the information. If the Council believes that the institution, in fact, has ceased operations, the grant of accreditation is summarily suspended. Such action is authorized without prior notice or hearing and with immediate public notice.

The institution shall be notified of the summary suspension in writing at its address of record. Within 10 days after receipt of the suspension notice, the institution may petition ACICS for an expedited determination of whether such suspension should be withdrawn. If no petition is filed within 10 days, the suspension automatically shall become a revocation effective as of the date of notice of suspension.

**2-2-302. Closing of a Nonmain Campus.** An institution is required to notify ACICS as far in advance as possible when it plans to close a nonmain campus. It must complete the appropriate forms describing its plans for teaching out its students and for storing and servicing its records and other information necessary for effecting the cessation of operations as smoothly as possible. The nonmain campus will cease to be included in the institution's grant of accreditation as of the effective date of the closing.

**2-2-303. Teach-out.** The Council may direct a currently accredited institutions to provide a school closure plan or a formal teach-out agreement in response to adverse information, high cohort default rate(s), low retention and/or placement rate(s), financial instability, or other concerns that may call into question the institution's ability to continue to serve the educational needs and objectives of its students or to continue as an on-going concern. If an institution closes or announces its intent to close, the Council will work to the extent feasible with the U.S. Department of Education and the appropriate state regulatory agencies to ensure that students are given reasonable opportunities to complete their education without additional charge. An institution that closes without completing its contractual training obligations to students must refund all unearned revenue. Should an institution enter into a teach-out agreement with another accredited institution, the signed agreement must be submitted to and approved by the Council prior to implementation. In addition to general information on the institutions entering into the teach-out agreement, the agreement must demonstrate that:

- (a) students will be provided, without additional charge, all of the instruction promised but not yet provided by the closing institution; and
- (b) the teach-out institution is geographically proximate to the closing institution or otherwise can provide students with reasonable access to its programs and services, and that it has the necessary experience, resources, and support services to provide

an educational program that is of acceptable quality and is reasonably similar in content, structure, and scheduling to that provided by the closing institution.

**2-2-400 – OWNERSHIP OR CONTROL**

The Council at all times must know who is in control of an accredited institution. The transfer of ownership or a change in the control of an institution is a substantial change that must be reported to the Council. In addition, any institution or owning corporation that is contemplating a transaction that may result in a change of ownership or control must notify the Council at least 15 days prior to consummating the proposed change. Failure to provide this notification in a timely manner may result in a delay processing the application. Transactions that constitute a change of ownership or control vary depending on the structure of the entity that owns or controls the institution.

Accredited institutions are owned or controlled by one of several types of corporations, by a limited partnership with a corporate general partner, or by a limited liability company, each of which is defined in the following subsections. In cases where the entity that directly owns or controls the institution is a subsidiary of another entity, the Council requires information on and monitors the ownership of the controlling entity, the parent entity, and any entities in the chain between those two.

- (a) *Privately held corporation.* A privately held corporation is one that operates for profit in which one or more stockholders own the voting stock of the corporation. The stock is marketable, but a majority of the voting stock is not traded on public markets overseen by governmental agencies such as the Securities and Exchange Commission in the United States. The control of a privately held corporation is vested in those in control of a majority of the voting stock of the corporation.
- (b) *Publicly traded corporation.* A publicly traded corporation is one that operates for profit in which a majority of the voting stock is traded on public markets overseen by governmental agencies such as the Securities and Exchange Commission in the United States. The control of a publicly traded corporation is vested in the voting members of the board of directors of the corporation.
- (c) *Not-for-profit corporation.* A not-for-profit corporation is one that has been determined by a governmental agency to be tax exempt for reasons the same as or similar to those set forth in Section 501 of the Internal Revenue Code of the United States. The control of a not-for-profit corporation is vested in the voting members of the board of directors of the corporation.
- (d) *Limited partnership with corporate general partner.* A limited partnership is one that is organized in accordance with the partnership laws of its home jurisdiction. The control of the limited partnership is vested in the general

partner, which must be a corporation as defined in subsection (a), (b), or (c) above.

- (e) Limited liability company. A limited liability company is one that has been granted a certificate of approval under the laws of the state corporation office or other appropriate regulatory body in its home jurisdiction. A limited liability company may or may not issue certificates of ownership. The control of a limited liability company is vested in the members, whose ownership interests are defined in the limited liability company operating agreement or other such governing document, who are in control of a majority of the direct or beneficial ownership interest in the company.

**2-2-401. *Change of Ownership or Control.*** A change of ownership or control generally means that a transaction has occurred whereby a new person, combination of persons, or entity can exercise control of a corporation or limited liability company as described in Section 2-2-400. The following subsections outline the typical changes of ownership or control of the three types of corporations that own accredited institutions, including corporate general partners in limited partnerships, and limited liability companies. Transactions other than those outlined below, however, may constitute a change of ownership or control, and the Council reserves the right in its discretion to make the determination of whether a change of ownership or control has occurred in all cases. Institutions, therefore, must keep the Council informed of all substantive changes in the ownership of stock and the composition of the board of directors.

In addition to the transactions outlined below, any change from one type of entity to another as defined in Section 2- 2-400 constitutes a change of ownership or control. Institutions also are reminded that nonmain campuses cannot be bought or sold independently of their main campus.

- (a) *Privately held corporation.* A change of ownership or control of a privately held corporation occurs as a result of any of the following transactions:
  - i. the transfer of 50% or more of the total outstanding voting stock from one party or parties to another party or parties;
  - ii. a transfer of voting stock that results in the ownership of 50% or more of the total outstanding voting stock by any party other than any previous owner of 50% or more of the total outstanding voting stock;
  - iii. a transfer of voting stock whereby a stockholder's ownership of outstanding voting stock decreases from more than 50% to 50% or less, or from 50% to less than 50%; or
  - iv. any other transaction whereby a stockholder or group of stockholders who previously could not exercise control of the corporation as described in Section 2-2-400(a) now can exercise control.

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- (b) *Publicly traded corporation.* A change of ownership or control of a publicly traded corporation occurs as a result of any of the following transactions or events:
- i. the change of 50% or more of the voting members of the board of directors in any rolling, 12-month period;
  - ii. a change in the number of voting members of the board of directors in any rolling, 12-month period that will allow a group of directors to exercise control who could not exercise control before the change;
  - iii. the acquisition of outstanding voting shares by any entity whereby that entity owns 50% or more of the total outstanding voting shares; or
  - iv. any other transaction that is deemed by an appropriate governmental agency to constitute a change of control, including but not limited to a transaction that requires the corporation to file Form 8-K with the Securities and Exchange Commission of the United States.
- (c) *Not-for-profit corporation.* A change of control of a not-for-profit corporation occurs as a result of any of the following occurrences:
- i. the change of 50% or more of the voting members of the board of directors in any rolling, 12-month period; or
  - ii. a change in the number of voting members of the board of directors in any rolling, 12-month period that will allow a group of directors to exercise control who could not exercise control before the change.
- (d) *Limited partnership with corporate general partner.* A change of ownership or control of a limited partnership with a corporate general partner occurs when the corporate general partner has undergone a change of ownership or control as defined in subsection (a), (b), or (c) above.
- (e) *Limited liability company.* A change of ownership or control of a limited liability company occurs as a result of any of the following transactions members to another member or members:
- i. a transfer of direct or beneficial ownership interest that results in the holding of 50% or more of the total direct or beneficial ownership interest by any member other than any previous member who owned 50% or more of the total direct or beneficial ownership interest;
  - ii. a transfer of direct or beneficial ownership interest whereby a member's direct or beneficial ownership interest decreases from more than 50% to 50% or less, or from 50% to less than 50%; or
  - iii. any other transaction whereby a member or group of members who previously could not exercise control of the company as described in Section 2-2-400(e) now can exercise control.

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A change of ownership or control also occurs when ownership or control of the primary assets of an institution or the authority to operate an institution is transferred from the controlling corporation, limited partnership, or limited liability company to another corporation, limited partnership, or limited liability company. A change of ownership or control, however, has not occurred when there is a transfer of assets among wholly owned subsidiary corporations or between a wholly owned subsidiary corporation and its parent corporation; a transfer of assets from a subsidiary corporation to its parent corporation where the parent corporation owns a majority of the outstanding stock of the subsidiary corporation; or a transfer of assets among subsidiary corporations where the common parent owns a majority of the outstanding stock of the subsidiary corporations.

The Council, for purposes of determining ownership or control, views married couples as a single entity, and it views closely related family groups as a single entity in most cases where all of the present and future relevant stockholders actively participate in the management of the corporation. No change of ownership occurs when stock is transferred to a close family member by operation of law or inheritance upon the death of one of the stockholders.

**2-2-402. *Contingent Sales.*** The Council will not grant reinstatement of accreditation after a change of ownership or control if the sale of the stock or assets triggering the change of ownership is contingent on approval of the transaction by the Council. If the transaction is rescinded as a result of a condition subsequent to the change of ownership or control of an institution, then the previous owner must apply to the Council for reinstatement.

**2-2-403. *Change of Ownership or Control Review Procedures.*** The following procedures govern the Council's review of changes of ownership or control:

- (a) *Automatic Discontinuation.* Any change of ownership or control results in the immediate and automatic discontinuation of an institution's grant of accreditation. The grant of accreditation may be reinstated only upon application to and approval by the Council. Because the discontinuation results without action or prior approval on the part of the Council, this change in status does not constitute withdrawal of accreditation and is not a negative action.
  
- (b) *Reinstatement.* After the grant of accreditation has been discontinued, it may be reinstated at the discretion of the Council at such time and according to terms and conditions that it has established or may establish in the future. Those terms and conditions are set forth in policy statements issued to the field and in the change of ownership application document that institutions must file to initiate the reinstatement process. When the Council is not in session, the Financial Review Committee is authorized to grant a temporary reinstatement of the grant of accreditation for a period sufficient to permit the Council to review and consider the application and all required supporting documentation.

The Council will conduct a site visit at any institution that has undergone a change of ownership or control within six months of the effective date of the

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change. The Council will not consider the final reinstatement of an institution's grant of accreditation until this visit has been conducted. In addition, the Council may require the new owner(s) or the chief on-site administrator to attend an Accreditation Workshop before the final reinstatement of an institution's grant of accreditation will be considered.

- (c) *Effect.* Until either temporary or final reinstatement of the grant of accreditation is granted, the accreditation of the institution remains in abeyance. If approval of the application for reinstatement is withheld, the matter will be treated procedurally as a deferral or denial, as the case may be. (See Title II, Chapter 3, Council Actions, for further information.)

### **2-2-500 – PROGRAMS OF STUDY REGULATIONS**

~~**2-2-501. Initiation and Evaluation of New Programs.** The Council must be notified prior to the start of all new programs. All new programs and modes of delivery must be initiated within one year of the planned start date. A new program must be approved by the Council before an institution or campus advertises, recruits, or enrolls students in the proposed program. The initiation of a new program process is required for any program of study never before offered on the campus whether delivered via residential, distance education, or hybrid. The institution or campus must submit an application and supporting documentation as outlined on the ACICS Web site. Where specified, information must be submitted on Council forms. Additions or deletions of courses included in a program of study that change the overall objective of a currently approved program, require the initiation of a new program application process. The submission of a Campus Accountability Report or catalog identifying a new program does not constitute appropriate notification to the Council.~~

~~Substantive changes to existing programs require the initiation of a substantive change to an existing program process. The submission of a Campus Accountability Report or catalog identifying program changes does not constitute appropriate notification to the Council. The following are changes to an existing program that would require the institution to submit a substantive change to an existing program application process:~~

- ~~(a) any change of 25% or more in existing contact hours, credit awarded, curriculum content (courses offered), or program length of a currently approved program;~~
- ~~(b) a change in academic measurement from clock hours to credit hours or vice versa, or a change from quarter to semester credit hours or vice versa; or~~
- ~~(c) any additions or deletions of courses offered that do not change the overall objective of a currently approved program.~~

~~An institution proposing new programs must assure ACICS that the programs conform to the stated mission of the institution and its current program offerings. The Council reserves the right when reviewing new programs to review the entire institution.~~

~~If a new program complements the general and occupational objectives upon which the institution previously has been evaluated and accredited, and the program is being~~

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presented to the public and students as it was presented to ACICS, ordinarily no further evaluation will be required at the time of approval. However, all program offerings of an institution are appropriately evaluated during an institution's initial grant of accreditation and renewal of accreditation evaluations.

If a new program is determined to be "out of scope" and is substantially different in course content, general or occupational objective, or in promotional description from other programs offered by the institution, ACICS may direct that a visit be conducted before granting final inclusion.

If, as a result of any new program visit, ACICS determines that the overall quality of an institution is being diminished, the institution may be scheduled for a full reevaluation.

***2-2-502. Initiation and Evaluation of New Programs at Higher Credential Levels than Previously Offered.*** An institution or campus that intends to offer its first new program at a higher credential than it previously has awarded must submit additional materials and undergo evaluation beyond those procedures outlined in Section 2-2-501 above. In addition to the initiation of a new program application process, the institution must submit a detailed transition plan describing how it is or intends to come into compliance with the requirements for this new credential as described in the applicable chapter of Title III of the *Accreditation Criteria*.

The New Program Application and transition plan will be reviewed by the Council. Any institution on quarterly reporting to the Financial Review Committee may be required to obtain prior permission from ACICS for the initiation of its first new program at a higher credential. If the application and plan are determined to be complete, an institution will be granted approval to advertise, recruit, and enroll for the program(s) and a readiness visit will be scheduled within six months of the initial start date of the program. The purpose of the readiness visit will be to assess the institution's initial capacity and compliance with the Accreditation Criteria for the higher credential.

The readiness visit report and the institution's response to the report will be reviewed by the Council at its next regularly scheduled meeting. If the Council determines that the transition plan is appropriate and that the institution is sufficiently prepared to offer the new credential, it will grant the institution initial inclusion for the new program. The Council will provide the institution in the initial inclusion notice with a timetable for the submission of periodic progress reports and for a credential inclusion site visit once the program has a sufficient enrollment and/or a sufficient number of graduates. Final inclusion of the new program will be granted by the Council only after the credential inclusion visit has been conducted.

Subsequent new programs at the new credential level will be evaluated by the Council using the new program procedures described in Section 2-2-501 above.

An institution may not submit an application for a new program at a higher credential when approval of final inclusion of a program at a lower credential level is pending. Institutions or campuses requesting to offer a new program at a higher credential more than one level above the current credential level, must first submit a request to the Council. The



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~~Council reserves the right to require a preliminary visit to the campus prior to the granting of such a request.~~

~~2-2-503~~ **2-2-501. *Evaluation of Programs for Purposes of Federal Financial Aid.*** As part of its evaluation of an institution for initial accreditation or renewal of accreditation, ACICS will review the institution's policies and procedures for determining credit hour assignments for purposes of awarding federal financial aid. ACICS will evaluate the reliability and accuracy of the institution's assignment of credit hours, as defined in 34 CFR 600.2 and in 34 CFR 668.8(k) and (l), to courses and programs and will determine whether this assignment conforms to commonly accepted practice in higher education.

- (a) Credit Hours for Credit Hour Programs. The evaluation of credit hour programs, as defined in 34 CFR 668.8(k), for purposes of financial aid is based on the following federal definition of a credit hour:

Except as provided in 34 CFR 668.8(k), a credit hour is an amount of work represented in intended learning outcomes and verified by evidence of student achievement that is an institutionally established equivalency that reasonably approximates not less than—(1) One hour of classroom or direct faculty instruction and a minimum of two hours of out of class student work each week for approximately fifteen weeks for one semester or trimester hour of credit, or ten to twelve weeks for one quarter hour of credit, or the equivalent amount of work over a different amount of time; or (2) At least an equivalent amount of work as required in paragraph (1) of this definition for other academic activities as established by the institution including laboratory work, internships, practica, studio work, and other academic work leading to the award of credit hours.

- (b) Credit Hours for Programs that are neither Credit Hour nor Clock Hour Programs. Clock hour programs as defined in 34 CFR 688.8(k)(2) may not assign credit hours for the purpose of awarding federal financial aid. However, undergraduate degree programs of less than two years in length and non-degree programs that are not fully transferrable to degree programs of at least two years in length (with at least two graduates) at the same institution are eligible to convert clock hours to credit hours for purposes of awarding federal financial aid. In doing so, these programs may seek to combine a minimum number of hours in a range of hours of student work outside of class with a required minimum number hours of instruction alone to meet or exceed a total number of clock hours of instruction. The evaluation of these clock-to-credit hour programs is based upon the following federal conversion formulas:

The institution's student work outside of class combined with the clock hours of instruction meet or exceed the following numeric requirements:

- i. A semester hour must include at least 37.5 clock hours of instruction;

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- ii. A trimester hour must include at least 37.5 clock hours of instruction; and
- iii. A quarter hour must include at least 25 clock hours of instruction; and  
The clock hours of instruction alone meet or exceed the following numeric requirements:
  - (A) A semester hour must include at least 30 clock hours of instruction;
  - (B) A trimester hour must include at least 30 clock hours of instruction; and
  - (C) A quarter hour must include a least 20 hours of instruction.

### ~~2-2-504 Changes to Programs.~~ (Reassigned to other sections of the Accreditation Criteria)

~~(a) Substantive Changes. Institutions must apply for approval from ACICS for any of the following changes to a program prior to their implementation or the revised program will be considered an unapproved program. Failure to do so will result in a show cause action for offering an unapproved program or unapproved mode of delivery. Institutions must submit the appropriate form and supporting documentation for the following:~~

- ~~(i) the offering of a program at a higher education credential than currently approved for;~~
- ~~(ii) any changes an increase of 25% or more in existing contact hours, credit awarded, curriculum content (courses offered), or program length of a currently awarded program;~~
- ~~(iii) a change from clock to credit hours or vice versa, or a change from quarter to semester credit hours or vice versa;~~
- ~~(iv) a change in the overall objective of the program;~~
- ~~(v) the initiation of an on-line delivery format of a program of study;~~

~~Changes, as noted in (v) above require the submission and approval of the appropriate application. An institution with initial approval to offer programs via online delivery may offer only programs or courses included in the application until final approval by the Council. If the institution wishes to offer additional programs on-line before final inclusion by the Council, it must separately obtain approval for each program. If the institution adds, deletes, or modifies on-line courses before final inclusion by the Council of online delivery, it must separately obtain approval for each program. Institutions with no prior online final inclusion, that plan to offer 100% of a program online, must first submit a request to the Director of Campus Development for a preliminary assessment of the institution's plans and capacity.~~

~~(b) Non-Substantive Changes. Institutions must submit for staff review and acknowledgement the following changes to programs.~~

- ~~(i) any change of less than 25% in existing contact hours; credit awarded, curriculum content (courses offered), or program length of a currently approved program; or~~
- ~~(ii) a change in the name of an existing program that does not change the overall objective of the program.~~
- ~~(iii) planned termination of an approved program.~~

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~~2-2-505~~ **2-2-502. Program Compliance Warning.** When the Council determines that a program at a campus of the institution has fallen below the compliance standard for retention, placement, or licensure pass rates, the institution will be provided in writing with a warning regarding the alleged deficiency. The warning will note that the program will have to come into compliance by meeting or exceeding the program-level standard prior to the expiration of the established timeframe or be taught out and discontinued or otherwise conditioned.

A program compliance warning is not a negative or conditioning action and is therefore not appealable. Rather, it is issued as an official notification to an institution that a program provided by the institution is out of compliance with agency standards. Following receipt of a program compliance warning, the institution must bring itself into compliance within the time frames specified in Title II, Chapter 3, or the institution will be subject to adverse action in the form of withdrawal of approval for inclusion of the program within the institution's grant of accreditation. The time frames may be extended at the sole discretion of the Council for good cause, including evidence that there has been significant improvement in the deficient area(s) and the applicable time frame does not provide sufficient time to demonstrate full compliance, e.g., significant improvement in retention, placement or licensure pass rates.

~~2-2-506~~ **2-2-503. Termination of Programs.** The withdrawal of approval for a program following the issuance of a program compliance warning or a decision by an institution to terminate any program voluntarily must be appropriately communicated to all interested publics. These publics include, but are not limited to, students, governmental agencies, the local community, and ACICS.

All institutions subject to the withdrawal of approval for a program or who voluntarily terminate an approved program will be directed to submit a program termination plan that conforms to the following requirements. New students may not be enrolled in any program which cannot be completed prior to the termination date for which public notice has been given. Moreover, the institution is obligated to continue to offer appropriate courses, including prerequisites, so that currently enrolled students will be able to complete the program and receive the credential which was their designated educational objective. For this purpose, the period of time need not extend beyond sufficient time for students already enrolled and maintaining normal academic progress to complete the program.

Council-directed withdrawal of approval for a program conditions the institution's grant of accreditation with respect to the inclusion of the program and therefore is appealable to the Council. Due to the limited nature and narrow scope of the withdrawal of program approval, the appeal to the Council may be in writing only.

To maintain approval, an institution must demonstrate active enrollment in each program of study. If an approved program is inactive for at least three years, the program will be considered discontinued and will be removed from the institution's list of approved programs. To reinstate the program, the institution must initiate a new program application process. Programs that have not started within one year of the proposed start date will be

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surrendered. To reinstate the program, the institution must initiate a new program application process. Requests to extend a new program's proposed start date beyond one year of the initial date must be submitted to the President.

~~2-2-507~~ **2-2-504. *Contracts or Agreements with Accredited Institutions.*** A written arrangement between one institution eligible to participate in HEA Title IV financial aid programs and another eligible institution or with a consortium of such institutions permits an institution to arrange for a portion of its approved program to be delivered by another accredited institution. Contracts or consortium agreements describing these arrangements must be in writing and must be disclosed in the catalog. Institutions are advised that specific state and federal regulations may apply.

- (a) The entire consortium agreement must be submitted to and approved by the Council prior to the institution's participation in the arrangement. The institution seeking approval of such an agreement must submit documentation that demonstrates that the other institution or the members of the consortium that will deliver instruction hold institutional accreditation from an accrediting agency recognized by the U.S. Department of Education and that the portion of the program to be delivered by any other institution has been approved by that institution's accrediting agency.
- (b) The consortium agreement must identify how the curriculum and instruction will be monitored, how curriculum revisions will be undertaken, and how student grievances will be addressed. The institution seeking approval of a consortium agreement must acknowledge in writing that it retains ultimate responsibility for the delivery of its programs and the satisfaction of its students.
- (c) More than 50% of the program must be delivered by the institution that awards the academic credential.

~~2-2-508~~ **2-2-505. *Contracts with Unaccredited Institutions or Entities.*** An institution may enter into a contract with an unaccredited institution or entity for the delivery of up to 25% of a program of study. The institution must submit the contract and provide the following information to ACICS for review and approval prior to the initiation of the contract:

- (a) a full catalog description of the program and the services to be provided by the contractor;
- (b) a systematic plan for administrative and student evaluations of instructors provided by the contractor;
- (c) evidence of the qualifications of faculty to teach the contracted courses;
- (d) a description of the instructional facilities provided by the contractor; and

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- (e) plans for the completion of the program should the contractor fail to provide contracted services.

~~2-2-509~~ **2-2-506. *Articulation Agreements with Secondary Schools.*** An institution may enter into an articulation agreement with a secondary school to transfer credit for courses taken at the secondary level that are equal to courses offered in a postsecondary institution. Articulation agreements must be in writing, periodically reviewed, signed, and dated. The institution must maintain a file consisting of the following: (1) a Letter of Intent to Articulate signed by both institutions specifying the numbers and titles of courses to be articulated, (2) a written description of the standards for acceptable transfer of credit, and (3) a comparison of the course objectives of the secondary and postsecondary courses(s) with signed approvals of both institutions. These credits appear on both the secondary and postsecondary transcripts.

~~2-2-510~~ **2-2-507. *International Partnership Agreements.*** An ACICS-accredited institution may enter into an international partnership agreement with an institution of higher education in a geographic location other than that of the United States or its territories. At least 25% of the program must be delivered by the institution that awards the academic credential.

The ACICS-accredited institution must submit an international partnership agreement to the Council and provide the following information to ACICS for review and approval prior to the initiation of the partnership agreement:

- (a) evidence provided by the institution or agency that the international partner and the programs to be delivered are recognized by an educational approval agency equivalent to an accrediting agency recognized by the US Department of Education;
- (b) a full catalog description of the program and the services to be provided through the partnership agreement;
- (c) a plan which describes recruitment, admission, standards of satisfactory academic progress;
- (d) a plan which describes student financial relations, including tuition and fees, and refund policies;
- (e) a description of the program(s) of study or courses offered;
- (f) a systematic plan for administration and student evaluations of instructors provided by in the partnership agreement;
- (g) evidence of the qualifications of faculty to teach;
- (h) a description of the instructional facilities at the international site;
- (i) a plan for the completion of the program(s) should the international partner fail to provide agreed upon services;

- (j) a plan for the safety and security of students, faculty, and staff.
- (k) specify which programs or portions are to be delivered via distance education and how the institutions will monitor growth.

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## 2. Proposed Criteria Revisions

At its December 2013 meeting, the Council reviewed the specific areas of the ACICS *Accreditation Criteria* outlined in Section II and approved the revisions as **proposed** (new language is underlined, ~~deleted language is struck~~). **Public comment on these revisions is requested on the Comment Form provided at the end of this memorandum.**

### A. CHANGE OF OWNERSHIP PROCESS

#### *Explanation of Proposed Changes*

*The Council proposes to modify language to strengthen and clarify standards that apply to the changes in ownership of the institution, and to better align ACICS requirements with federal regulations.*

**Section 2-2-403. Change of Ownership or Control Review Procedures.** The following procedures govern the Council's review of changes of ownership or control:

- (a) *Automatic Discontinuation.* Any change of ownership or control results in the immediate and automatic discontinuation of an institution's grant of accreditation. The grant of accreditation may be reinstated only upon application to and approval by the Council. Because the discontinuation results without action or prior approval on the part of the Council, this change in status does not constitute withdrawal of accreditation and is not a negative action.
- (b) *Reinstatement.* After the grant of accreditation has been discontinued, it may be reinstated at the discretion of the Council at such time and according to terms and conditions that it has established or may establish in the future. Those terms and conditions are set forth in policy statements issued to the field and in the change of ownership application document that institutions must file to initiate the reinstatement process. When the Council is not in session, the Financial Review Committee is authorized to ~~grant a temporary reinstatement of the grant of accreditation for a period sufficient to permit the Council to~~ review and consider the application and all required supporting documentation and to recommend to the Executive Committee, which may grant a reinstatement of the grant of accreditation.

The Council will conduct a site visit for the purpose of monitoring the quality of education at any institution that has undergone a change of ownership or control within six months of the effective date of the change. ~~The Council will not consider the final~~

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~~reinstatement of an institution's grant of accreditation until this visit has been conducted.~~ In addition, the Council may require the new owner(s) or the chief on-site administrator to attend an Accreditation Workshop before the ~~final reinstatement of an institution's grant of accreditation will be considered~~ visit is conducted.

(c) *Effect.* Until ~~either temporary or final~~ reinstatement of the grant of accreditation is granted, the accreditation of the institution remains in abeyance. If approval of the application for reinstatement is withheld, the matter will be treated procedurally as a deferral or denial, as the case may be. (See Title II, Chapter 3, Council Actions, for further information.)

### B. SELF-STUDY SUBMISSION

#### *Explanation of Proposed Changes*

*The Council proposes to modify language to include action that may be taken if institutions do not submit or submit a late self-study.*

**Section 2-1-300. New Grant of Accreditation.** It is the responsibility of the institution to file an application and remit the appropriate fees for a new grant of accreditation by September 30<sup>th</sup> of the year prior to last year of the grant of accreditation. This also involves submission of the institution's self-study, with supporting documents. Institutions that have not submitted a self-study by December 1<sup>st</sup> of the year preceding expiration of the grant, and which have not requested and received an appropriate extension or notified the Council of intent to voluntarily withdraw its accreditation, will be brought before the Business Practices Committee of the Council at the December meeting. At such time, the committee may vote to show cause those institutions. may be directed to show cause why its accreditation should not be withdrawn, suspended or otherwise conditioned. The accreditation previously granted to an institution expires automatically with the passage of time unless extended by an action taken by ACICS. An extension of the previous grant cannot exceed one year, and not more than one extension may be given except for extraordinary circumstances over which the institution has no control.

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## 1. For Information Only

### A. ACICS WEB SITE

Please visit the ACICS Web site. It continues to be revised and updated based on Council activities. The site contains revised and detailed information about accreditation, accredited institutions, applications, publications, workshops and special events. New features are now available.

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**NOTE:** All institutions were mailed eight digit IDs and passwords to access the new ACICS website. The information was sent via U.S. postal mail and addressed to the campus director or president of each institution. The institution and corporate username (unless changed by the account holder) is the eight-digit ID. This ID should be used on all future correspondence to and from ACICS. If you have questions about your ID code or our new website, please send an email to [ebiz@acics.org](mailto:ebiz@acics.org).

### B. 2014 WORKSHOP SCHEDULE

<b><i>CEP/CAR WORKSHOP</i></b>		
<b><i>CEP/CAR Workshop</i></b>	September 4, 2014	ACICS Office
<b><i>INITIAL ACCREDITATION WORKSHOP</i></b>		
<b><i>Initial Accreditation Workshop</i></b>	February 26, 2014	ACICS Office
<b><i>Initial Accreditation Workshop</i></b>	June 3, 2014	Seattle, WA
<b><i>Initial Accreditation Workshop</i></b>	October 14, 2014	Monterey, CA
<b><i>RENEWAL ACCREDITATION WORKSHOP</i></b>		
<b><i>Renewal Accreditation Workshop</i></b>	February 27, 2014	ACICS Office
<b><i>Renewal Accreditation Workshop</i></b>	February 28, 2014	ACICS Office
<b><i>Renewal Accreditation Workshop</i></b>	June 3, 2014	Aventura, FL
<b><i>Renewal Accreditation Workshop</i></b>	September 3, 2014	ACICS Office
<b><i>Renewal Accreditation Workshop</i></b>	September 5, 2014	ACICS Office
<b><i>Renewal Accreditation Workshop</i></b>	October 14, 2014	Monterey, CA
<b><i>Renewal Accreditation Workshop</i></b>	November 3, 2014	New Orleans, LA
<b><i>RETENTION AND PLACEMENT WORKSHOP</i></b>		



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Retention and Placement Workshop	February 20, 2014	ACICS Office
Retention and Placement Workshop	March 7, 2014	ACICS Office

### C. PUBLIC COMMENT

The Council encourages institutions to provide feedback regarding Council operations and procedures. Comments on the proposed *Criteria* revisions are due by **Friday, March 7, 2014**.

### D. PUBLIC PARTICIPATION

ACICS has given high priority to promoting and defending ACICS accreditation, and the quality of education delivered by member institutions. Schools play an important role acting as the eyes and ears of ACICS: that is, looking and listening for opportunities to promote ACICS accreditation, and to correct misinformation that may lead to negative perceptions and attitudes among policy makers, the post-secondary education community and the general public. As you identify those opportunities in communities where you operate, please let us know about them. Send an email to Mr. Quentin Dean at [qdean@acics.org](mailto:qdean@acics.org) and let him know the source of the information and when it appeared.

### E. ACICS AWARE WEBINARS

The AWARE webinar will be held on **Wednesday, February 26, 2014**. This webinar will focus on information presented in the January 2014 Memorandum to the Field and information from the Council's February 2014 Council meeting. If there are any topics of interest in addition to those in this memorandum that you would like to be addressed during the webinar, please send an email to Ms. Terron King at [tking@acics.org](mailto:tking@acics.org).

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**1. Comment Form-Proposed Criteria Revisions**

ACICS ID Code: \_\_\_\_\_ Date: \_\_\_\_\_

Name of Organization: \_\_\_\_\_

Address: \_\_\_\_\_

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***Please check (as appropriate):***

Proposed *Accreditation Criteria* revisions:

- Change of Ownership Process

Accept as Written     Modify (please explain)

- Self-Study Submission

Accept as Written     Modify (please explain)

Prepared by: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

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**Please respond by Friday, March 7, 2014 to:**

Ms. Terron King  
Senior Manager of Policy & Institutional Review  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE, Suite 980  
Washington, DC 20002-4241  
Fax (202) 842-2593  
[fieldcomments@acics.org](mailto:fieldcomments@acics.org)