

Council of Recognized National Accrediting Agencies

October 15, 2009

RE: Vocational School Guides Review, Matter No.P097701

We are writing in response to the call for comment on the FTC *Guides for Private Vocational and Distance Education Schools*.

This set of comments is endorsed by each of the Executive Directors of the accrediting agencies that comprise the membership of the Council of Recognized National Accrediting Agencies (CRNAA). CRNAA is an alliance of six accrediting bodies, each of which is officially recognized by the U.S. Secretary of Education as a “reliable authority as to the quality of education and training” offered by the respective educational institutions each accredits.

CRNAA members accredit over 2,100 education institutions which collectively serve over 3.5 million students. The CRNAA accrediting agencies cooperated actively with the FTC in creating the first set of private school guides in the early 1970s, and supported the republication of the revised guides in 1998. We did this because we believe strongly that the nation’s consumers need protection when considering enrollment in a private vocational or career school, and since there are thousands of such schools that are not accredited by any accrediting agency, the FTC’s Guides have served as an excellent national resource for protecting the consumer of vocational education. We cannot see where there is any compelling reason to discontinue the Guides today.

As accrediting agencies, we create academic and ethical standards whenever we see a need for guidance for institutions in their dealing with students. Easily available on the web, these accreditation standards demonstrate what a framework for fair dealings with student consumers should look like. A review of the accreditation standards used by each of the CRNAA agencies will show that our respective members *already comply* with the each provision of the current FTC Guides.

We are writing today to encourage and support the retention of the Guides because they give practical leverage and clear instruction to all parties in the vocational school sector. These guides set forth a national set of rules describing unethical operations that cheat American citizens, and cast a bad light on an important and effective sector of higher education. Additionally, they create a level playing field for all industry members, they give guidance to state oversight and consumer protection agencies, and they can help consumers in making informed decisions.



For the many thousands of unaccredited career and vocational schools that aggressively seek to enroll students, and the many millions of consumers who enroll in these schools, the Guides are necessary to cover great gaps in State oversight and licensure, the only other source of threshold requirements for vocational school operations. The long-recognized weaknesses and variability of state licensing and monitoring of career schools are well known. They were dramatically illustrated recently when vocational school licensing operations were temporarily shut down altogether in the States of Illinois and California.

With harsher economic times upon us, Americans increasingly are turning to career education and training schools as an avenue to a better career and a better job. Enrollments at vocational colleges and schools are soaring, and because of the capabilities and features of the Internet, there has been an explosion of several hundred fraudulent diploma mills since 1998, when the Guides were last issued.

In times of economic recessions, conventional colleges have notable limitations in meeting the growing demands from the public for training, including limited space for new students, state budgets being cut, high tuition costs, and a long lead-in time in responding to offering training in new areas of technology. Especially for employed adults, the convenience, shorter time frames, and lower costs of private and distance education colleges and schools make them the students' only practical choice. In such times, the fraudulent school operators can enjoy a "field day" in preying on the uninformed.

Unfortunately, consumers are often not aware of the importance of recognized accreditation and the assurances that it provides. Most cannot even define what the word "accreditation" means. With relatively little knowledge about how career colleges and schools can vary in quality and ethics, these consumers of education can be stripped of their time and money, and have their dreams of a better future crushed by an attractive school website touting a phony accreditation. Some institutions even falsely claim accreditation they do not hold, or claim accreditation from a bogus accrediting body. Since CRNAA members are nonprofit agencies with limited resources, the FTC Guides can be of help in getting prospective students to change their decision and enroll with a legitimately accredited institution. The FTC Guides also provide important leverage to remove from our industry those whose operations fall far short of accreditation standards.

For decades, accreditation has served to ensure that students are treated fairly and that promotional methods are completely truthful. With the advent of the Internet and the pressure to acquire more educational credentials, the danger of exploitation of Americans by unaccredited schools has grown. To an appreciable degree, the FTC Guides extends to any prospective student many of the protections that students attending our schools already have. It is our belief that the FTC Guides are needed today more than ever before.

The Call for Comment in the July 30th *Federal Register* notice lists over two dozen questions concerning particular aspects of the current Guides. Rather than attempt to respond to the many complex questions listed in the Call for Comment, representatives of CRNAA are very willing to talk with and/or meet FTC officials to explore these questions in depth and offer the benefit of our long experience.

As agencies that worked with the FTC to develop the first edition of the guides 37 years ago, we are most anxious to work to keep the Guides in place and up to date.

Please call Roger J. Williams, Chair of the CRNAA, at 202-955-1113, ext. 105, or email him at rjwilliams@accet.org to schedule a meeting to discuss the Guides.

Sincerely,

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Encl.: CRNAA Information Sheet

About The Council of Recognized National Accrediting Agencies (CRNAA)

CRNAA is an alliance of six (6) accrediting agencies with a national scope whose objectives are to promote and inspire the continuous peer review and assessment of accreditation practices predicated upon ensuring the quality and integrity of postsecondary education and training and to ensure that the purposes and interests of accreditation, accredited institutions, and the students they serve are properly represented and fostered. CRNAA members are recognized by the Secretary of the U.S. Department of Education as reliable authorities on the quality of education and training offered by accredited institutions for the purpose of institutional eligibility to participate in federal student financial assistance programs.

Accreditation is a private, voluntary, non-governmental, peer-review process. Accrediting agencies enhance the quality of education provided and promote institutional accountability by systematically and comprehensively evaluating institutions based on pre-established standards. The accreditation process determines if the educational programs offered to the public are as claimed with respect to objectives, contents, and results. The institutions accredited by CRNAA's six (6) accrediting agencies number 2,100 with approximately three and a half (3.5) million students educated and trained each year.



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