



January 17, 2020

Dr. Judith Eaton  
President  
Council for Higher Education Accreditation  
One Dupont Circle, NW, Suite 510  
Washington, D.C. 20036-1135

Re: Notice of Withdrawal

Dear Dr. Eaton:

In accordance with Paragraph 19 of the *Recognition of Accrediting Organizations Policy and Procedures* (“**Recognition Policy**”), this serves as written notice to the Council for Higher Education Accreditation (“**CHEA**”) that the Board of the Accrediting Council for Independent Colleges and Schools (“**ACICS**”) has voted to voluntarily withdraw its pending application for recognition by CHEA effective immediately.

Please be assured that this action was taken after very careful deliberation by the ACICS Board. ACICS has not ruled out the possibility of applying for CHEA recognition in the future. We have determined, however, that at this time there are too many unanswered questions about the recognition process at CHEA to provide a reasonable level of comfort to the Board that the agency will receive a full and fair review.

Although CHEA does not require an agency to provide reasons for a voluntary withdrawal decision, we thought it would be helpful to communicate some key points about our decision. ACICS will also be making a press statement today.

First, ACICS is not withdrawing the application because we have concerns that the agency does not meet CHEA’s standards. To the contrary, we believe strongly that the information the agency submitted with its recognition application - both narrative and evidence - satisfies any reasonable interpretation of CHEA’s standards. We filed our substantive response to the nine standards identified as noncompliant in the Committee’s recommendation on January 15, 2020 and that document provides our full response detailing why we believe the Committee’s recommendation is clearly erroneous based on the record.

Second, we don’t believe that the timing for a recognition review of this agency by CHEA is right for either ACICS or CHEA. CHEA has just revised its standards and has not undertaken any recognition reviews under its new standards. In addition, CHEA provided little substantive feedback to ACICS through the recognition process to date or in the Committee’s recommendation to deny recognition regarding how it interprets its new and revised standards. As a result, we believe ACICS would benefit from allowing CHEA more time to apply its

standards to other agencies and determine what types of evidence will satisfy the revised standards. CHEA, likewise, would benefit by reviewing other agencies under its new standards without having the intense focus on its ACICS decision be a marker for how it will apply its new standards in the future. Simply, the time and resources required to pursue the CHEA recognition process are significant and the decision is important enough that ACICS wants to ensure it has the best information available about the scope, parameters and interpretation of the CHEA's current standards. More time and experience with CHEA applying its revised standards to other agencies will assist in this regard and we believe strongly that will aid both ACICS and CHEA in its future recognition discussions.

Third, we had several unanswered questions about our specific review that made us question whether the agency was receiving the benefit of a full and fair review. For example, for six of the nine standards the Committee found deficient, already recognized agencies, including ACICS, were provided a copy of CHEA's *Transition Framework for Currently Recognized Accrediting Organizations* ("**Transition Framework**") that permitted agencies additional time to provide evidence of compliance for certain new or revised standards. Specifically, for Standard 11.A.1 and 11.C.2 deemed deficient by the Committee, the Transition Framework allows recognized agencies to submit evidence of compliance through April 30, 2019. For Standards 10.C, 11.A.3, 11.A.4, and 11.B.1, also deemed deficient by the Committee, the Transition Framework allows for evidence of compliance through January 1, 2020. Despite repeated attempts to clarify whether the Transition Framework applied to the ACICS review, we never received a clear answer. ACICS was not permitted to provide supplementary evidence after the March 1, 2019 submission, nor is it permitted to during the remainder of the review process. If ACICS submits a recognition application in the future, it will be clearer what evidentiary standards apply to our review.

Fourth, we have concerns with CHEA's internal processes to date in reviewing ACICS's recognition application. On January 13, 2020 (48 hours before the ACICS response to the Committee's denial recommendation was due), ACICS was contacted via email by Ms. Lori Schroeder, CHEA's Vice President for Recognition Services, stating that "it has come to the staff's attention that the CHEA staff, and by extension, the CHEA Board do not have access to the exhibits associated with the Recognition Application or the ACICS response to the Observation Report via Sharepoint." ACICS first submitted its narrative and exhibits on March 1, 2019, and it troubles us that CHEA may not have had access to all of our supporting documentation at all phases of its review despite multiple submissions of that evidence through a variety of means at CHEA's request. Although CHEA staff has since assured us that the Committee and Board had access to all information necessary for its deliberations on the ACICS recommendation for denial, the Committee recommendation itself as well as the transcript of ACICS's public hearing before the Board indicate strongly to us that the Board and Committee may not have thoroughly reviewed all evidence submitted in support of our application.

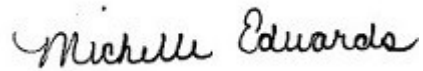
We do not expect CHEA to agree with the procedural issues we have raised here, but given the importance of the CHEA recognition process to us it is in our best interest to proceed when our Board has greater confidence that our agency will receive a full and fair review. By delaying our

Dr. Judith Eaton  
January 17, 2020  
Page 3 of 3

recognition application to a later date, we will benefit from a fuller transition by CHEA to its new rules and processes for petition review.

Please extend our gratitude to the CHEA staff for the work done to date to assist ACICS with the recognition process.

Sincerely,

A handwritten signature in cursive script that reads "Michelle Edwards".

Michelle Edwards  
President and CEO