



November 21, 2022

Betsy Wickham, Bureau Chief
State Approving Agency
Florida Department of Veterans' Affairs
Via email

Joshua Jacobs, Senior Advisor for Policy
Performing the Delegable Duties of the
Under Secretary for Benefits
Veterans Benefits Administration
Via email

Re: Full Sail University

Dear Ms. Wickham and Mr. Jacobs,

We write to bring to your attention new information about Full Sail University and to request that the Florida Department of Veterans Affairs State Approving Agency (FSAA) and the Veterans Benefits Administration undertake a risk-based survey, as provided in 38 U.S.C. § 3673, of Full Sail University.

In March of this year, Full Sail University's accreditor, Accrediting Commission of Career Schools and Colleges (ACCSC), placed Full Sail on [warning](#) and further directed Full Sail to cease enrollment in four programs and to cap enrollment in a fifth program.¹ ACCSC informed Full Sail that it "may next elevate this action to a Probation if significant improvement is not made and impactful institutional action is taken by the school at its next review."² ACCSC requested Full Sail to submit additional specific information relating to student outcomes by July 1, 2022.³ Presently, Full Sail remains on Warning according to the [ACCSC website](#).⁴

In its March letter to Full Sail, ACCSC explained that "the length of time the school has been subject to monitoring and the growing number of programs falling below benchmark rates . . . raised the question whether Full Sail's management is able to develop institutional policies, practices, and monitoring mechanisms that support successful student achievement across the array of the school's program areas."⁵

¹ Letter to Full Sail University from Michale S. McComis, Executive Director, Accrediting Commission of Career Schools and Colleges (ACCSC), March 1, 2022

<https://www.accsc.org/UploadedDocuments/2022/Public-Notice/Redacted-Letters/Full-Sail-University-055214-SAL-Warning-Letter.pdf> (last accessed 11/18/22)

² *Id.* at p. 7.

³ *Id.* at p. 14.

⁴ ACCSC.org "Public Notice of Warning: The following ACCSC-accredited schools are currently on Warning:(as of November 17, 2022)..Full Sail University-Winter Park, FL"

<https://www.accsc.org/Commission-Actions/Schools-on-Warning.aspx> (last accessed 11/18/22)

⁵ Letter to Full Sail from ACCSC at p. 3.

Additionally, ACCSC said it has questions “regarding some employment classifications,” pointing to instances where Full Sail’s classification of a graduate’s job does not appear “appropriate and reasonable” to the accreditor.⁶ ACCSC also requested information about the school’s “reverse transfer policy”, which appeared to result in some students graduating only days or weeks after starting the programs.⁷

Pursuant to 38 U.S.C. §3673, a risk-based survey should be conducted under these circumstances. Subsection 3673(e)(3)(D) requires a survey in the event of “loss, or risk of loss, by an educational institution of an accreditation from an accrediting agency or association, including notice of probation, suspension, an order to show cause relating to the educational institution’s academic policies and practices or to its financial stability, or revocation of accreditation.” Also, as provided in §3673(f)(2)(B), the enforcement and approval duties of the SAA include completing “a risk-based survey of any course or program of education determined to be of questionable quality or at risk by any Federal or State agency or any accrediting agency.”

We also request that VBA add a cautionary warning to the GI Bill Comparison Tool showing that Full Sail has been placed on Warning by its accreditor. ACCSC appears to have notified the Department of Education⁸ about the [warning status](#). ACCSC directed Full Sail “to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order.”⁹ Clearly this is the type of important information expected to be disclosed to students, and veterans rely on the VA and the Comparison Tool for information when choosing a school. Please add a Caution Flag for Full Sail University with a [link to the Warning letter](#) that is available on the ACCSC website.

We appreciate your time and consideration. Over [4,000 GI Bill](#) students attended Full Sail University in 2021.¹⁰ We strongly encourage VA and FSAA to conduct a risk-based survey and take all appropriate action to protect the veterans’ hard-earned GI Bill benefits and ensure that Full Sail University is delivering the quality education promised to the veterans.

Sincerely,



Della M. Justice
Vice President for Legal Affairs

⁶ *Id.* at pp. 3 and 8.

⁷ *Id.* at 7.

⁸ ACCSC Memorandum to U.S. Department of Education, Appropriate State Agencies, and Appropriate Accrediting Agencies, March 2, 2022 <https://www.accsc.org/UploadedDocuments/2022/Public-Notice/ACCSC-030222-Public-Notice.pdf> (last accessed 11/18/22)

⁹ Letter to Full Sail from ACCSC at p. 14.

¹⁰ GI Bill Comparison Tool <https://www.va.gov/education/gi-bill-comparison-tool/institution/21970110> (last accessed 11/18/22)