



December 8, 2023

Herman Bounds
Director of Accreditation Group
Office of Postsecondary Education
U.S. Department of Education
Via email: ThirdPartyComments@ed.gov

RE: Written Comments - Southern Association of Colleges and Schools, Commission on Colleges (SACSCOC)

Dear Mr. Bounds,

I write on behalf of Veterans Education Success in response to the Department of Education's Notice Accrediting Agencies Currently Undergoing Review for the Purpose of Recognition by the U.S. Secretary of Education, published on November 6, 2023.¹ Veterans Education Success is a nonprofit organization that works on a bipartisan basis to advance higher education success for veterans, service members, and military families, and to protect the integrity and promise of the GI Bill and other federal postsecondary education programs.

My comments concern SACSCOC and the senior Department official's (SDO) decision letter dated November 7, 2022,² requiring SACSCOC to submit a compliance report and a monitoring report within 12 months. We believe our information presented below may be of assistance to the Department in assessing SACSCOC's compliance. We stand ready to provide the Department with additional details and information, as needed.

Student Veterans Raise Concerns About SACSCOC's Oversight of its Schools

During SACSCOC's recent reauthorization review, we submitted [comments](#)³ expressing concern about the extent to which SACSCOC consistently applies and enforces its institutional accrediting standards. The SDO decision letter requesting a compliance report from SACSCOC within 12 months reflected similar concerns. Many of the Areas of Noncompliance listed in the letter pertain directly to the adequacy and quality of SACSCOC oversight.

We have received student veteran complaints about SACSCOC schools that also point to the need for improved oversight from SACSCOC. One student veteran who had enrolled in Keiser University's online accelerated Applied Engineering program in 2021 recently testified to the Department of Education about the poor quality of the education he received: "...the coursework was so bad. It was full of errors. The classes that were specific to engineering were just awful. The math was all wrong and the instructors just read from a powerpoint. It seemed like the only

¹ 88 FR 76194

² US Dept. of Education, Office of the Under Secretary, SACS Decision Letter (November 7, 2022) available under NACIQI meeting date 07/19/2022 at <https://surveys.ope.ed.gov/erecognition/#/public-documents>

³ Veterans Education Success Written Comments (August 15, 2021) available at <https://vetsedsuccess.org/our-letter-to-the-office-of-postsecondary-education-regarding-accrediting-sacscoc/>

qualification for the instructors was that they be able to read from a powerpoint. There was no teaching.”

Student veterans who attended Keiser University also have raised concerns about being responsible for unexpected charges for classes they withdrew from or did not attend.

SACSCOC’s Complaint Handling is Inadequate for Meaningful Oversight of Schools

The SDO decision letter also documented concerns about SACSCOC’s complaint handling process and asked SACSCOC to provide an analysis “of whether your internal processes for handling complaints are appropriately weighted to balance the need to avoid frivolous complaints with the potential for procedural and administrative hurdles to undermine individuals’ efforts to call potential areas of institutional noncompliance to your attention...”⁴

We reviewed SACSCOC’s website and found that SACSCOC’s complaint handling remains inadequate. Specifically, SACSCOC’s complaint process deters the submission of complaints and consequently limits the kinds of information available to it about the institutions it oversees. Consider the following:

First, SACSCOC’s [complaint process](#) apparently has not been updated since 2019, notwithstanding the complaint-handling issues raised during SACSCOC’s reauthorization meeting and the specific concerns raised in the SDO letter over a year ago.

Second, information about submitting a complaint to SACSCOC is not readily available on its webpage. The SACSCOC homepage, <https://sacscoc.org/>, does not have a direct link for student information or complaints. Rather, information about submitting complaints to SACSCOC is under the FAQs link, below the section on accreditation. SACSCOC and other accreditors should be required to provide information for submitting complaints prominently and directly from its homepage.

Third, SACSCOC’s complaint policy continues to require complainants to submit 2 paper copies of the complaint form to SACSCOC through regular mail. This requires the complainant to either go through the cumbersome process of asking SACSCOC to mail a paper copy of the form or to have access to a printer. This requirement clearly is an unnecessary barrier to submitting complaints.

Fourth, SACSCOC continues to require the complainants to specifically identify which of the accreditation standards the school has violated. The accreditor should not be asking students to review and decipher its own standards. SACSCOC should review complaints in light of its expertise and knowledge of its own standards to determine if the allegations give rise to potential noncompliance.

Fifth, SACSCOC requires the complainants to have first tried to resolve the issue with the school, specifically stating:

⁴ SACSCOC Complaints Against Institutions-Information Sheet and Form available at <https://sacscoc.org/app/uploads/2020/01/ComplaintPolicy-1.pdf>

As outlined in the complaint policy, it is the responsibility of the complainant first to attempt to resolve the matter with the institution. The complainant is responsible for providing documentation that all remedies available at the institution have been exhausted. In order to file a complaint with SACSCOC, the complainant must describe these efforts on the complaint form.⁵

An accrediting agency is responsible for monitoring and evaluating the performance of the schools it accredits. Requiring the student to have first tried to resolve the issue with the school before contacting the accreditor is at cross-purposes with the role of the accreditor, potentially screening out serious instances and trends of noncompliance. Further, requiring students to first try to work it out with the schools is nonsensical when the allegation is that the school failed to competently provide an adequate education.

While the Department of Education's [guidance](#) to accrediting agencies about complaint procedures⁶ should result in better practices at SACSCOC and other accreditors, when reviewing SACSCOC's compliance report please consider the complaint-handling policies that SACSCOC maintained following the SDO's decision letter.

NACIQI Public Comment Process

As we have noted previously in other comment periods, the Department's process for comment is not conducive to receiving valuable input from the public regarding accrediting agencies. The Department should have made the SACSCOC compliance report available to the public and allowed the public to review it prior to the deadline for submitting comments. Certainly it would have been helpful to see SACSCOC's response to the SDO's concerns about its complaint process.

Further, the deadline for public comment is a year in advance of the meeting. This carries the risk of the public input appearing stale and easily disregarded at the point of decision making while also preventing the public from submitting more current information for consideration in a timely manner. We urge the Department to adopt new practices for meaningfully engaging the public in evaluating accrediting agency performance and overseeing the Department's and NACIQI's review of the agencies.

Thank you for considering our recommendations and concerns.

Sincerely,

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⁵ Id.

⁶ Office of Postsecondary Education, [Guidance for Ensuring Complaint Procedures for Accrediting Agencies are Timely, Fair, and Equitable](#) (August 7, 2023) available at <https://www2.ed.gov/admins/finaid/accred/guidance-for-ensuring-complaint-procedures.pdf>