

State of Vermont 1 National Life Drive, Davis 5 Montpelier, VT 05620 education.vermont.gov [phone] 802-828-1130 [fax] 802-828-6430 State Board of Education

January 19, 2022

Legislative Committee on Administrative Rules c/o Charlene Dindo

Re: Final Proposed Rule 7000 Series - #21P035

Dear Members of the Legislative Committee on Administrative Rules:

One individual – Michale McComis, the Executive Director of the Accrediting Commission of Career Schools and Colleges (ACCSC) – offered public comments to the proposed rule at the December 1, 2021 public hearing. The State Board did not receive any written public comments.

Current Rule 7320 lists the National Association of Trade and Technical Schools (NATTS) as a State Board-recognized accrediting agency. Mr McComis stated that ACCSC is the successor to NATTS. The US Secretary of Education recognizes ACCSC as an agency that accredits both non-degree and degree programs. Mr. McComis explained that the term "regional accrediting agencies" is no longer an accurate description and that it would be more appropriate to refer to them as "institutional accrediting agencies."

Mr McComis suggested the following amendments to Rule 7320:

- 1. Strike the word "regional" and replace it with the word "institutional."
- 2. Strike "National Association of Trade and Technical Schools, Washington, DC (for nondegree granting purposes only)" and replace the name with "Accrediting Commission of Career Schools and Colleges (ACCSC), Arlington, VA."

The State Board of Education incorporated both suggested changes.

We look forward to presenting the State Board of Educations final proposed Rule Series 7000 to the Legislative Committee on Administrative Rules, and will be available to address any questions or concerns you may have about the Board's process or the substance of the Rules.

Sincerely

/s/ Oliver Olsen

Oliver Olsen Chair, State Board of Education

