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ABSTRACT

This report presents the findings and conclusions of a study undertaken at the request of the Louisiana Legislature to examine the feasibility of the award of associate degrees by nationally accredited proprietary institutions in Louisiana. Information for the study was obtained through a review of the literature, criteria of national and regional agencies for the accreditation of proprietary institutions, and through a questionnaire survey concerning existing practices in other states to which 41 states responded. Included in the report are examinations of the definition of proprietary schools, their historical and present purposes, estimates of enrollment, costs of attendance in comparison to other types of institutions, and their strengths and weaknesses. Also reviewed are the standards of national and regional accrediting agencies and the present practices and future plans of the various states regarding the grant of associate degrees by proprietary schools. Recommendations call for the establishment of a non-academic degree entitled "The Associate in Occupational Studies--(Area of Emphasis)" and of a mechanism for approval of occupational degree proposals from accredited proprietary schools through the current licensing agency, the Board of Elementary and Secondary Education. It is not recommended that proprietary schools award the Associate of Arts or the Associate of Science degrees. (JDS)

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ACCREDITED PROPRIETARY SCHOOLS  
AND ASSOCIATE DEGREES

Prepared by the Board of Regents  
In Response to House Concurrent Resolution No. 116  
of the 1975 Regular Session of the La. Legislature

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## Preface

In response to House Concurrent Resolution No. 116 of the Regular Session of the 1975 Louisiana Legislature, the Board of Regents has prepared this study "relative to the granting of associate degrees by nationally accredited proprietary schools."

According to Wellford W. Wilms, one of the primary researchers in the field, proprietary schools have existed in America for over three centuries. Wilms states that "proprietary vocational training" began in Plymouth Colony in 1605 and has continued to the present by adapting to meet changing demands. Influenced by the Industrial Revolution, proprietary schools offered courses in merchant accounts, typing, and shorthand. Even during the Civil War, proprietary schools continued to function, and by Wilms' account forty Bryant and Stratton Schools were operating at the time.<sup>1</sup> David A. Trivett, author of Proprietary Schools and Postsecondary Education, states that proprietary business schools have "a peculiarly American history, having provided most of the office workers needed in earlier periods of the twentieth century."<sup>2</sup> Trivett also comments that in the early 1900's most cities of over 10,000 persons had an independent business school, and all subsequent forms of business education began with such institutions.<sup>3</sup>

Despite a long and seemingly influential history, proprietary schools have only recently gained any significant recognition. In the past few years, competition with institutions of higher education and new educational finance legislation--notably the "Student Assistance Provisions" and the Community Colleges and Occupational Education Amendment--have encouraged nationwide

interest in independent schools. Higher education officials are examining university enrollment declines and discovering that higher education shares a market with proprietary schools. Persons and agencies seeking federal funds are finding that educational amendments have provided substantial support to proprietary education. With proprietary institutions becoming increasingly more competitive for both students and funds, the tradition of ignoring these institutions is being abandoned.

Unfortunately, those seeking to know more about proprietary schools have little data available to them. Trivett, remarking upon this lack of information, theorizes that it is scarce for three reasons: first, no official interest has been taken in the subject until the past few years; second, no single agency or organization has accumulated data, established definitions, or created standards; and third, "for competitive reasons, presumably, some schools and their interest groups are reluctant to publish precise figures."<sup>4</sup>

Trivett himself has made a major contribution to the study of proprietary schools by synthesizing much of the research in the field. In the monograph he authored for the Educational Resources Information Center, Proprietary Schools and Postsecondary Education, Trivett surveys the information provided by a number of other researchers. He shows that, in many cases, the data are so unreliable as to be contradictory; in other cases, the researchers offer such similar information that their comments are redundant. In fact, because of the dearth of knowledge about proprietary schools, it is common for those who write, or speak, about the institutions to quote each other rather than disclose new data. For this reason, Trivett's synthesis of their research proved to be quite valuable in the conduct of this study.

One of the most frequently quoted researchers is Wellford W. Wilms. Trivett alludes to Wilms' work numerous times, as this report does also. Wilms' chapter in Lifelong Learners - A New Clientele for Higher Education, was especially helpful in responding to the resolution, as was his article on proprietary schools in Change magazine, Summer, 1973.

The other sources that provided the most useful information were a book chapter by Jack H. Jones, "Proprietary Schools as a National Resource," selected portions of Lewis B. Mayhew's book, Higher Education for Occupations, and the educational news weekly, The Chronicle of Higher Education. Additionally, forty-one states responded to questionnaires prepared by the Board of Regents' staff, and the regional and national accrediting agencies furnished the staff with criteria relevant to proprietary school accreditation.

## Chapter One

### A PERSPECTIVE ON PROPRIETARY SCHOOLS

Several recent factors have caused an increased national awareness of proprietary schools. Trivett lists at least six reasons for the current interest. First, institutions of higher education are experiencing declining enrollments, not only because of changing birthrates, but also because of students' growing disenchantment with the marketability of a college degree. Career preparation seems to be a major concern of postsecondary students, and higher education personnel are beginning to recognize that proprietary schools are competing with colleges for students.

Second, Trivett writes that some state legislatures are requesting coordination of all educational resources, requiring that the previously ignored proprietary schools be included. Effective coordination of a state's educational efforts cannot be accomplished without adequate knowledge of the involved institutions, thus proprietary education is being examined thoroughly.

Third, a 1973 Panel on Youth, sponsored by the President's Science Advisory Committee, presented a recommendation that focused attention upon proprietary schools. This panel defined the mission of higher education as preparation of youth for adulthood, and advised that higher education is only one means of preparation. A suggested alternative to higher education was beginning work earlier, an alternative that vocational proprietary schools have long recognized. By comparing early employment with higher education

as means of attaining maturity, the White House panel gave the goals of proprietary schools a measure of status heretofore nonexistent.

Fourth, the Ninety-second Congress created "Student Assistance Provisions" in 1972, which provide that educational grants may be given to students regardless of scholarship or institutional choice. Students needing funds for education or training may qualify for Basic Opportunity Grants through the legislation, and may use the grants wherever they wish. In some instances, students utilize these funds in proprietary schools, a choice they did not have before.

Fifth, the same congress also established "Special Programs for Students from Disadvantaged Backgrounds." Through these programs, students from low-income families are prepared for postsecondary education by remedial instruction. Among those institutions which are eligible to be contractors are proprietary schools.

Sixth, the congress created another amendment in 1972 that encouraged awareness of proprietary education. Section 1202 of the Community Colleges and Occupational Education Amendment requires that states desiring to use the funds the amendment makes available must "establish a State Commission or designate an existing State agency or State Commission. . .to make studies, conduct surveys, submit recommendations, or otherwise contribute the best available expertise from the institutions, interest groups, and segments of the society most concerned with a particular aspect of the Commission's work." Most states have responded by establishing 1202 Commissions which plan for all

segments of postsecondary education. Because proprietary schools are specified in the amendment, the commissions must include them in their coordination efforts in order to qualify for funds.<sup>5</sup> The Board of Regents is Louisiana's designated 1202 Commission, and as such is completing an inventory of postsecondary occupational training programs. The accumulated data will be compiled into a directory listing program offerings, costs, and available financial assistance for all of Louisiana's occupational schools, including proprietaries. This directory will be distributed to the state's high school counselors, thus broadening the students' knowledge of alternatives to traditional education.

Until these actions which strengthened the competition emerged, higher education was unconcerned with the role of proprietary schools. Wilms explains that ignoring their presence was probably easy, for "in the early days, proprietary schools were conducted as businesses and run by businessmen and businesswomen whose interests centered on student recruitment and the bottom line of the income statement rather than on academics and scholarly writing. The interests and style of these business people probably eluded most traditional educators and offended the rest."<sup>6</sup> Furthermore, the scarcity of information about proprietary education kept persons in higher education unconcerned about the unknown competition between them. Wilms reports that when public college presidents and public technical school directors were asked if they competed with other schools for students, they named each other's institutions as potential rivals. None of those queried named proprietary schools, although proprietary school directors certainly named public institutions. The lack of knowledge has been almost totally one-sided, with only proprietary schools cognizant of the other's influence.<sup>7</sup>

Because of the new attention given proprietary education, people are beginning to ask basic questions about every aspect of these independent schools. Some of the most frequently asked are:

1. What are proprietary schools?
2. What **is** their purpose?
3. How many students attend them?
4. What is the cost?
5. What are **proprietary schools'** strengths?
6. What are their weaknesses?

This chapter attempts to create a foundation for responding to the resolution by answering those questions as completely as possible.

#### WHAT ARE PROPRIETARY SCHOOLS?

Richard Fulton, Executive Director of the Association of Independent Colleges and Schools, says that the term "proprietary" merely refers to **one** type of institutional governance. In his opinion, "there are only three basic forms of institutional governance." He categorizes the tax-supported public schools, such as area vocational schools, community colleges, and state colleges and universities as "tax-consuming institutions." He calls private, non-profit colleges "tax-avoiding institutions." The third category includes proprietary schools, and Fulton labels those "tax-paying institutions."<sup>8</sup> Of course, proprietary schools pay taxes because they are the only educational institutions which are owned and operated for a profit.

The profit motive accounts for most of the distinctions made between proprietary schools and other postsecondary institutions. The "bottom line

of the income statement" influences practices and policies to such an extent that even the administrative structure of a proprietary school is different from those in public and private schools. In fact, budgetary considerations result in a more streamlined staff, one which Edward Erickson refers to as a "management team." This team consists of a president, a dean or director of education, and several admissions counselors, all of whom are responsible for "increasing student enrollments, meeting cost and quality standards, and assuring placement for graduates."<sup>9</sup> The chief administrator even involves himself in courses and programs, instead of external fund raising, because the courses and programs are the means of attracting the tuition-paying clientele.<sup>10</sup> Unlike public and private educational institutions, each facet of administration in proprietaries is related to earning a profit for the owners.

Ownership is another aspect which must be examined if proprietaries are to be more fully understood. Jay Miller and William Hamilton describe three basic types of ownership of proprietary schools:

(A) Sole proprietorship means that the institution is owned and controlled by one person. He employs the personnel, sets the policies, and makes the decisions. He is responsible for the success or failure of the educational enterprise. Practically all business schools were originally sole proprietorships. . .

Partnership is a form of organization in which two or more individuals combine their capital and abilities in the operation of the school. Each partner is generally responsible for the acts of any and all of the partners. . .

Today (1964), the corporation is the most popular form of business school organization. The independent business school that operates as a corporation is almost always incorporated under the laws of the state in which the school is located and naturally is subject to all the statutes involving corporations in that state.<sup>11</sup>

Confirming Miller's and Hamilton's statement about the most popular type of ownership, Wilms says that eighty-five percent of proprietary schools in the United States are owned by corporations such as Bell and Howell, Control Data, Minneapolis Honeywell, and IT&T.<sup>12</sup> Larry Van Dyne, reporting for The Chronicle of Higher Education, lists the thirteen proprietary schools with the largest enrollments, among them Bell and Howell and Elba Systems Corporation.<sup>13</sup> Trivett asserts that it is erroneous to consider proprietary institutions as only "mom-and-pop" organizations.<sup>14</sup>

#### WHAT IS THE PURPOSE OF PROPRIETARY SCHOOLS?

As previously mentioned, from an administrator's viewpoint the fundamental purpose is to operate a profitable and successful educational institution. Erickson declares that owners and administrators are primarily concerned with staying in business,<sup>15</sup> and Lewis Mayhew writes that proprietaries "are for the most part conducted for the profits derived primarily from tuition."<sup>16</sup>

From a student's perspective, the purpose is basically vocational education. Proprietary school enrollees seek "well-defined skill training and placement," not self-discovery, and proprietaries provide them "specific occupational training aimed toward full-time job placement in the shortest possible time."<sup>17</sup>

Both points of view are correct, of course, because the institutions make a profit when they respond to students' demands for job training. Jones writes that

...recruiting efforts of proprietary schools are not directed toward the student who wants to attend college while 'finding himself,' rather it seeks the student who has decided upon a career goal. . . . To serve such students the school does not offer an educational smorgasbord, but provides specialized programs and courses designed to prepare the student to qualify for his career objective in the shortest possible time.<sup>18</sup>

Trivett describes two major types of resident proprietary schools-- business schools and trade and technical schools.<sup>19</sup> Defining the business school as both an "educational enterprise" and a "business enterprise," Trivett describes its offerings as wide-ranging. A student may enroll in a specialized business school to learn a short-term skill such as typing; he may enroll in a comprehensive business school for both skill-training and foundation courses; or he may select an institution offering business and general courses that approximate those taught in a community college. The trade and technical schools also provide a variety of programs--"air conditioning, automobile repair, drafting, electronic technology, medical assisting, photography, welding, and such untraditional fields as baseball umpiring and horse-shoeing."<sup>20</sup>

Fulton cautions against interpreting proprietary schools' function as being limited to only vocational training. Although he agrees that most proprietary institutions are career-oriented, he also states that "there are liberal arts and collegial proprietary institutions."<sup>21</sup> Keeping his warning in mind, it is still appropriate to accept Wilms' view that single-purpose proprietaries "give top priority to training students for employment."<sup>22</sup>

#### HOW MANY STUDENTS ATTEND PROPRIETARY SCHOOLS?

This answer depends upon the source of information. In 1973, the Federal Trade Commission released figures stating that 3.3 million people were enrolled in proprietary schools.<sup>23</sup> Wilms agrees with that number,<sup>24</sup> but Harold Orlans, a senior research associate at the National Academy of Public Administration, does not. He found estimates ranging from 1.7 million to 15.3 million.<sup>25</sup>

Time magazine suggested that one million Americans were enrolled in proprietary vocational schools, yet the Carnegie Commission identified the number as 3.8 million.<sup>26</sup>

Even the number of institutions cannot be agreed upon, for Trivett estimates the number of proprietary occupational schools at 8,279, while the FTC assesses it at 10,000.<sup>27</sup> As he did concerning the number of students, Wilms supports the FTC figure.<sup>28</sup> Despite the lack of actual statistics, it is reasonable to believe that the numbers of schools and students are large enough to be significant in postsecondary education.

Much of the research involving proprietary schools contains information about students to explain high enrollments. Wilms, in his chapter "Profile of Proprietary Students," reveals both aspirations and characteristics of proprietary school students as they relate to enrollment. He states that proprietary schools attract people who are likely to be high school dropouts, minority members, low-scoring in verbal skills, highly motivated and goal-oriented, and of lower socio-economic status than their public school counterparts.<sup>29</sup> Although not all of the students possess these characteristics, Wilms writes that enough of them do to make his findings significant. He theorizes that public vocational-technical schools seem like extensions of middle-class academia, to which these students cannot relate; thus, they choose to attend institutions which do not fit that category. Furthermore, governed by the profit motive, proprietary schools actively "seek out student markets not served by nearby competing public schools."<sup>30</sup> Although middle-class students can do well in proprietary institutions, proprietaries focus upon attracting students who have no other alternative

WHAT IS THE COST?

At first estimate, the cost of proprietary education seems quite high. Wilms calls the institutions, "relatively expensive,"<sup>31</sup> and Erickson states that tuition is set as high as possible without discouraging enrollment.<sup>32</sup> Trivett explains that tuition is great because it is the entire source of capital for both operating expenditures and profit.<sup>33</sup> Although none of these sources cite specific costs for attending proprietary schools, it is commonly accepted that these institutions are more expensive than comparable public schools.

However, Richard Freeman estimates that time costs are lower in proprietary schools, for the students acquire work skills in a matter of weeks or months instead of years.<sup>34</sup> Thus, while the college student is completing a one, two, or four-year course of study, the proprietary student may be applying his training and earning a salary. Using Freeman's reasoning, the college student may forego earnings for a number of years, making the cost of his education proportionately greater than the cost paid by the proprietary student.

Furthermore, it is Freeman's theory that the cost to society is less through proprietary education. Combining Freeman's and Fulton's theories, it appears that public schools, as tax-consuming institutions, use society's financial support for educational purposes, whereas proprietary schools, as tax-paying institutions, contribute to public funds. If, as Freeman also concludes, "formal job training is important in the formation of human capital in the United States," then the training provided by proprietary schools is less costly to society since society pays nothing for a benefit.<sup>35</sup>

A different opinion of the cost of proprietary training is offered by Mayhew. He writes that vocational programs in both proprietary and non-proprietary

schools effectively produce graduates with marketable skills, thus the proprietary student has no real advantage over his counterpart. In fact, Mayhew asserts that non-proprietary school graduates ~~realize~~ greater financial gain after vocational training than the proprietary school graduates do because they receive essentially the same instruction at a lower price.<sup>36</sup>

A statement by Trivett summarizes the problem in evaluating cost. He declares that "more reliable figures" are necessary before "accurate, actual cost comparisons for the various forms of postsecondary education" can be made.<sup>37</sup> Despite Freeman's theories and Mayhew's findings, no comprehensive, comparative analyses have been done, thus the real costs cannot be stated within this study.

#### WHAT ARE PROPRIETARY SCHOOLS' STRENGTHS?

The most frequently mentioned strengths of proprietary schools are flexibility, short programs, and specialized training for non-academically oriented students.

##### Flexibility

Mayhew cites flexibility in enrollment schedules as a major factor in the schools' popularity.<sup>38</sup> Public schools generally enroll students on a quarter, trimester or semester basis, but some proprietary institutions enroll new students as often as every week.<sup>39</sup> Because of this practice, students may accommodate career training to their own schedules, registering to take courses at times suitable to their own needs.

Harvey Belitsky lists a number of additional flexible features. Trivett credits Belitsky with identifying "the appearance of courses in fields that public schools don't or won't train for, a wide range of actual admissions

requirements, the use of aptitude tests rather than formal educational attainment for program admission, a great variety of attendance schedules, year-round operation, day, evening, full, and part-time courses," and the enrollment schedule.<sup>40</sup>

Another example of flexibility concerns the program offerings. Proprietary schools cannot make a profit by offering irrelevant or worthless courses, thus the administrators modify or eliminate courses and techniques which become outmoded. Furthermore, they add programs and methods which are in demand. Mayhew says that since proprietary schools depend upon tuition, "their directors try to be sensitive to changes in the labor market, both to attract students and to insure their graduates jobs."<sup>41</sup> Being aware of the market encourages administrators to update even the equipment used in the programs. According to Erickson and H. H. Katz, much of the equipment in proprietary schools is leased, and thus can be the most modern available. Katz points out that such is rarely the case in public schools.<sup>42</sup>

#### Short Programs

The second major positive feature is the length of the programs. Freeman states that "unlike colleges and universities, which take little account of student time, proprietary schools treat it as a costly input and try to minimize time costs by giving intensive courses that meet 4 - 6 hours daily, during periods of the day that reduce lost work time."<sup>43</sup> In addition to occupying only a few hours of the student's day, "the proprietary student will finish his course of study much more quickly than the public student. While the proprietary student works fewer hours each week and earns less,

he will be available for full-time employment sooner."<sup>44</sup> Although such cost-effectiveness and the debate about its validity have already been presented in this study, it is included in this section because the students accept it and are attracted by it. The opportunity to work and attend school at the same time, as well as complete the training quickly, is an undeniable drawing card.

### Career Orientation

The third strength of proprietary schools concerns the type of student who elects to attend. Although this subject has also been mentioned earlier in the study, researchers themselves remark upon it so frequently that it is important to identify it as a major factor. The typical proprietary student has few resources to bring to traditional classes, thus single-purpose proprietaries focus upon career training and omit general education requirements.<sup>45</sup> Jones points out the absence of "an educational smorgasbord,"<sup>46</sup> and Belitsky theorizes that "job-oriented training with much achievement reinforcement may be the most successful program, especially for disadvantaged students."<sup>47</sup> Proprietary schools actively serve the members of society who cannot, or do not wish to, spend time in courses unrelated to job skills. The schools offer specialized programs in which the students may obtain skills without the frustration of additional courses. Apparently, this practice is agreeable to the students, for the dropout rate in proprietary schools is remarkably low.<sup>48</sup>

### WHAT ARE PROPRIETARY SCHOOLS' WEAKNESSES?

#### Profit Motive

One of the answers to this question can be a weakness or a strength, depending upon who is asked: the profit motive. Those who consider it a

strength will attribute all the positive features of proprietary schools to their search for profit. Each innovation, adjustment, or deletion of practices is a method of making the schools attractive to consumers. Without constant improvement and updating the schools would fail, thus they are forced to maintain up-to-date training.

Critics of the profit motive are skeptical. Trivett writes that proprietary education has been ostracized because of its money-making foundation, and Fulton states that detractors have long considered profit-seeking proprietaries "a hardy weed in the academic garden."<sup>49</sup> Miller and Hamilton attempt to defend the institutions with a question: "Why is it considered admirable by some observers to conduct any kind of legitimate business enterprise at a profit except that of education?"<sup>50</sup>

Although this feasibility study has examined the strengths of proprietary schools as a function of the profit motive, the profit orientation is listed here as a weakness because it elicits suspicion and debate from many academicians. As Miller and Hamilton implied, a number of people do not consider education to be a marketable commodity. In the following chapter it will be shown that that view is held by one of the regional accrediting agencies, which accredits only those proprietaries which invest "substantially all" income into their educational programs. Some critics of proprietary schools not only object to the principle of making a business out of education, but also object to demonstrable abuses which result in some profit-oriented schools.

### Consumer Abuses

In an article in The Chronicle of Higher Education, reporter Larry Van Dyne writes that "The consumer protection movement. . . is beginning to turn its attention to sham and malpractice in post-high school education." He continues,

Misleading job promises, deceptive advertising, vacuous promotion brochures, high-pressure sales and a lack of candor in recruiting, degree mills, discriminatory tuition-refund policies, abuse of government student aid programs, hucksterism disguised as innovation--all are targets of the consumer advocates, both inside government agencies and in private organizations.<sup>51</sup>

Although Van Dyne states that both public and proprietary schools are being investigated for abuses, Trivett details a number of factors that belong to proprietary schools alone. One should not infer from the following that all proprietary schools are equally guilty of abusive practices, for many owners make a conscientious effort to maintain high levels of performance. However, at the opposite end of the spectrum are those owners and directors who engage in unethical practices for the sole purpose of making a profit. According to Trivett, a Federal Trade Commission pamphlet lists several problems students may encounter in unethical proprietary institutions:

... that course content and facilities are no good; that few complete the school; that the school gives no refund; that the school will not help find promised jobs; that employers think the training is no good; that there are no jobs for the skills taught.<sup>52</sup>

In short, Trivett suggests through the FTC warning that there are innumerable ways for unscrupulous schools to deceive students.

The licensing of a school does not entirely prevent abuses, for it frequently amounts to only a permit to do business. State regulatory standards

often apply to only the business aspects of proprietary schools, leaving the educational matters relatively ungoverned. Furthermore, the FTC points out that the federal government has no check on educational requirements, for it does not accredit schools.<sup>53</sup>

In Louisiana, the standards for licensing include provisions for both business and educational matters. Among other things, the minimum standards for schools seeking a license require proof of solvency, truth in advertising and recruitment, just refund practices, and qualified instructors. Furthermore, licensed proprietary schools must submit all new courses to the Proprietary School Commission for approval or disapproval. Because no proprietary school under the Commission's jurisdiction "shall do business in this state unless the owner thereof holds a valid license issued by the commission,"<sup>54</sup> Louisiana has statutory safeguards against some abuses, both economic and educational.

Unfortunately, the Louisiana laws concerning proprietary schools are silent on one significant educational aspect: the granting of degrees. No criteria are specified for degree-granting status, nor does the legislative act require that the Commission develop such criteria. Act 311 states merely that ". . .no . . .degree . . .shall be offered or awarded . . .until the owner of the school planning to offer . . .degrees has obtained a license from the Commission. . ."<sup>55</sup> Apparently, proprietary schools wishing to offer a degree may do so at will without having to submit a proposal to any responsible board. Proprietary schools thus have the freedom to offer any type of degree, while Louisiana's public colleges and universities are required by the Constitution

to obtain approval of degrees from the Board of Regents. Such latitude concerning proprietaries could result in abusive educational practices and the subsequent devaluation of all degrees in Louisiana. An Educational Resources Information Center report states that "the degrees from (institutions) whose academic programs are superficial and inferior will undermine the value of similar degrees from institutions whose educational offerings are excellent."<sup>56</sup> Although the licensing of Louisiana's proprietaries prevents a number of abuses, the lack of degree-granting criteria for proprietaries leaves other potential problems unchecked.

#### Accreditation

Accreditation is "a method of protecting the public by identifying quality institutions and helping to maintain and raise institutional standards. It complements but differs from licensure or certification. . ."<sup>57</sup> As mentioned previously, accreditation is non-governmental, therefore, institutions apply for accreditation candidacy voluntarily.

In the United States, two national agencies accredit resident proprietary schools--the Association of Independent Colleges and Schools and the National Association of Trade and Technical Schools. The former--AICS--accredits business institutions, while the latter--NATTS--accredits trade and technical schools. Their standards will be examined in detail in the next chapter, but it is appropriate to state their objectives here. AICS professes "an unyielding commitment to a high standard of professional responsibility and a stringent code of ethics." The preamble of AICS defines accreditation as the following:

accreditation is an ongoing process through which peer institutions exemplify a voluntary commitment to actions which are perceived to be in the best interests of society, students, and other institutions. Accreditation should transcend the static relationships between the regulator and the regulated.<sup>58</sup>

This statement expresses AICS' philosophy that responsible institutions desire to achieve more than governmental licensing standards require. Proprietaries meeting AICS' criteria, and receiving accreditation, are deemed to be more concerned with raising their standards than non-accredited proprietaries.

The Association Constitution of NATTS is more explicit in defining the purpose and objectives of accreditation. The primary purpose is "to establish and maintain high educational standards and ethical business practices," and the objectives are to

- Assist good private trade and technical schools to become better schools.
- Assure the public of high quality trade and technical education offered by private schools.
- Set standards to which all private trade and technical schools can aspire.<sup>59</sup>

The institutions which do receive accreditation from AICS or NATTS adhere to strict regulations. Failure to maintain standards will result in termination of their accredited status. In this portion of the paper, accreditation is listed as a weakness in proprietary education, not because of any question about its value, but because of the small number of proprietaries who seek to obtain it.

Most non-profit postsecondary institutions apply for and receive accreditation through their accrediting associations. Jones states that approximately 90% of the public and private schools are accredited. However, among proprietary schools the reverse is true--approximately 90% are not accredited.<sup>60</sup> These non-accredited proprietaries are satisfied with meeting the minimum licensing requirements, and proprietaries' detractors could well regard this situation as an indication of apathy toward educational excellence. It could be argued, as a result, that most proprietary owners are interested in meeting only those standards necessary for legitimizing their business concerns.

In Louisiana, sixty-six proprietaries hold licenses from the Proprietary School Commission; seventeen of them are accredited by AICS or NATTS.<sup>61</sup> Although the percentage of non-accredited schools is lower in Louisiana than it is nationally, it is still quite high--seventy-four percent. Regardless of the positive statements made about proprietaries by their advocates, the lack of demonstrable interest in accreditation reduces the credibility of claims about educational concern.

Chapter Two  
NATIONWIDE PRACTICES

REGIONAL ACCREDITING ASSOCIATIONS

In 1969, a proprietary school for women in Washington, D.C., sued for full accreditation from a regional organization, the Middle States Association of Colleges and Secondary Schools. The institution, Marjorie Webster Junior College, had been denied membership in the association because of its proprietary status. The school won the case, only to have the decision reversed by a court of appeals, and Middle States Association continued its policy of excluding proprietary schools from accreditation.

In 1974, the association changed its position and voted to admit proprietary schools. Now proprietaries in any of the states in the Middle States region may apply for membership and receive full institutional accreditation.<sup>62</sup> However, they must first meet three stringent requirements:

- 1) Receive authority from the appropriate state agency to grant a two-year or four-year degree,
- 2) Be governed by a board which is broadly representative of the public interest, and
- 3) Devote "substantially all" income to education.

The last stipulation requires that proprietary schools become essentially non-profit, and for that reason, members of the association's study committee expect few proprietary schools to apply.<sup>63</sup>

The other five regional accrediting associations are generally not that confining in their requirements. Only one regional accrediting organization, The New England Association of Schools and Colleges, Inc., still denies membership to proprietaries,<sup>64</sup> but the others are more liberal. Three--North Central Association of Colleges and Schools,<sup>65</sup> Northwest Association of Schools and Colleges,<sup>66</sup> and Western Association of Schools and Colleges<sup>67</sup>--state that they do not distinguish between proprietary and non-proprietary schools for accrediting purposes. They do not stipulate that proprietary institutions invest their profits in educational programs prior to eligibility, thus the associations do not discourage interest in full accreditation on that basis. However, all of these accrediting associations require that member institutions offer general education courses in their programs, a prerequisite that proprietary schools find objectionable. Only the Western Association reports any proprietary schools as members.<sup>68</sup>

The sixth regional accrediting association, the Southern Association of Colleges and Schools,<sup>69</sup> has a different approach. Although its College Commission requires the standard general education courses, its Commission on Occupational Education Institutions, which was established December 1, 1971, does not. The Southern Association thus has two accrediting commissions which offer full accreditation to qualified schools--one for traditional education institutions and one for occupational schools. A proprietary school may apply as either type of institution depending upon its mission, for "the same criteria will be applied to a proprietary as that of a public school."<sup>70</sup>

Because Louisiana is in the SACS region, the accreditation standards of that association are examined more closely than the others. Fundamentally, a proprietary school wishing to be accredited as a regular degree-granting institution must already have degree-granting status. In addition, it must require that its students receive at least one-fourth of their education in general studies, giving particular attention to oral and written communication. Furthermore, a proprietary institution granting an Associate Degree must require that participating students first have a high school diploma or equivalent.<sup>71</sup>

Some proprietary schools may find such prerequisites for accreditation acceptable, but others--those whose students resemble Wilms' description--may consider the requirements too stringent. General education courses could discourage their clientele, and the requirement for a high school diploma could eliminate entirely a large number of potential students and, therefore, profits.

For those proprietary institutions desiring full accreditation from SACS without meeting the prerequisites of the Commission on Colleges, accreditation through the Commission on Occupational Education Institutions is available. This Commission extends accreditation to the entire institution, and although "It does not certify that every part of an institution is of equal quality," it "does indicate that no one part is so weak" that the school's effectiveness and services will be undermined.<sup>72</sup> SACS established the Commission "in recognition of the need to improve the quality and quantity of occupational education in the South,"<sup>73</sup> and set up the requirement that

all candidates for accreditation "have a clear emphasis on occupational education as the core of instruction."<sup>74</sup> This Commission allows the granting of degrees with the stipulation that institutions clarify the fact that the degrees are work-related, not academically oriented. Furthermore, although a receiving institution may accept the credit for transfer, "the degree implies non-transferability for collegiate credit to an academic college or university."<sup>75</sup>

### NATIONAL ACCREDITING ASSOCIATIONS

The two major accrediting agencies for resident proprietary schools are often similar to SACS in their requirements for associate degree-granting institutions. Like SACS, both AICS and NATTS provide for two types of associate degrees: academic and occupational. A comparison of several standards of all three associations for each type of degree reveals both their similarities and their differences:

#### The Academic Associate Degree:

SACS	AICS	NATTS
1. Degree programs shall require high school graduation or the equivalent.	High school graduation, or equivalent, is <b>required for admission.</b>	Entrance (to a program) shall require a high school diploma or equivalency certificate.
2. Degree programs shall contain a basic core of general education (formerly stated as 25% of all courses).	16 of the required 60 minimum hours shall be in general education. (approximately <b>25%</b> )	A minimum of 25% of the curriculum must be in general education or general education related to the occupational subjects.
3. No provision for minimum time limit.	Minimum time limit of 4 semesters (or <b>2 years</b> ) to receive degree.	Requirement of a minimum of 1800 clock hours (two academic years).
4. No provision concerning legal authorization or statutes.	Institution must be "legally authorized under the laws of its state to grant the associate degree." <sup>76</sup>	If state has statutory provisions governing associate degrees, school must be in compliance. <sup>77</sup>

The Occupational Associate Degree

SACS	AICS	NATTS
1. May accept students without a high school education. <sup>78</sup>	High school graduation, or equivalent, is required for admission.	Entrance (to a program) shall require a high school diploma or equivalency certificate.
2. "the degree implies non-transferability for collegiate credit".	No provision concerning academic status or transferability	All advertising and publications must state clearly that the degree is not academic.
3. May award this degree based on performance; no minimum time requirement. <sup>79</sup>	Minimum time limit of two academic years.	Requirement of a minimum of 1800 clock hours (two academic years).
4. Occupational education should clearly be the core of instruction.	No provision stating minimum amount of occupational courses.	A minimum of 75% of the curriculum must be in the specific occupational area.
5. No provision concerning legal authorization or statutes.	Must have state authority to grant this degree.	If state has statutory provisions governing associate degrees, schools must be in compliance.

Obviously, a comparison of regional accreditation standards (SACS) and the standards of the two national accrediting associations (AICS and NATTS) reveals that where the standards differ, AICS and NATTS generally have more explicit requirements. Specifically, AICS and NATTS are more explicit concerning minimum time limits and statutory provisions. They are also more stringent than SACS in their requirement of a high school education for students entering the occupational degree program. Furthermore, the national associations, like SACS, extend full accreditation to entire institutions and require state licensing of each institution. Any predisposition to consider regional accreditation superior to national accreditation is largely unfounded.

## INDIVIDUAL STATES

Counting Louisiana, forty-two states are examined in this portion of the paper. Sixteen of the forty-two, or nearly forty percent, replied that they do not have provisions for authorizing proprietary schools to grant degrees. The other twenty-six states responded affirmatively to the first question--"Are proprietary schools in this state authorized to grant academic degrees?"

### Problems in Evaluation

Unfortunately, these twenty-six "yes" responses do not always serve as reliable indicators of actual practice. For example, Alabama responded "yes" to the first question, yet additional information from the Alabama Commission on Higher Education reveals that the actual answer is "no." Although four proprietary schools do award academic degrees in Alabama,

Alabama law states that if an institution offers "academic courses toward a recognized and valid degree," it is exempt from state approval of its standards and practices.

From this statement, it would seem that no authorization is granted to Alabama's proprietary schools from any agency, regardless of the state's initial response.

Another state which returned a questionable affirmative answer is Iowa. Iowa's State Board of Regents replied "yes" to the first question, but enclosed this remark: "No one presently collects data on the proprietary schools, nor does anyone approve their activities." Despite Iowa's affirmative reply, it is clear that no such authorization exists. Kentucky also replied "yes," yet supplied the subsequent comment, "Current legislation

does not authorize degrees to be awarded by proprietary schools, and no agency is assigned."

The types of responses received from the various states brings to mind Trivett's warning about studying proprietary schools. In the preface of this paper he was quoted as having said that accurate information concerning proprietaries was scarce, and where it did exist it was likely to be ill-defined. The data received from a number of states seem to confirm Trivett's point.

#### Examination of Practices

To clarify the information on statewide practices, the state responses were analyzed, then categorized in table form. An examination of the table reveals inconsistencies in some instances and explicit information in others.

(See p. 29.)

The sixteen states signified by an asterisk presently have thorough plans for authorizing proprietary schools to grant academic degrees. Three more states, Arizona, Nevada, and Texas, state that they have plans but no criteria, although Nevada is currently developing criteria. Yet another two states--Indiana and Ohio--responded that they have complete plans, but they did not supply information regarding the basis for their authority. Missouri responded simply that proprietary schools were authorized to grant the Ph.D., and Michigan replied that they were in the process of developing standards for governing proprietary schools and academic degrees.

Ten of the sixteen states with thorough plans have simple, clearly-stated provisions for permitting proprietary schools to award associate

PROPRIETARY SCHOOLS AND AUTHORIZATION OF ACADEMIC DEGREES

State	(A)	(B)	(C)			(D)			(E)
	Degrees Authorized	Degrees Granted	Level of Degrees			Basis of Authority			Authorizin Agency
			Assoc.	Bacc.	Other	Exec.	Leg.	Const.	
ALABAMA	X	X							State Dept of Educati
ARIZONA	X	X	X	X	X		X		State Boar Private Te & Business Dept. of H Education
ARKANSAS*	see Col.G		X				X		Dept. of H Education
COLORADO									
CONNECTICUT*	X		X	X			X		Commission Higher Edu
DISTRICT OF*									
COLUMBIA	X	X	X	X			X		D.C. Board Higher Edu
DELAWARE*	X		X	X			X		State Boar Education
FLORIDA*	X	X	X				X		State Boar Independen and Univer
GEORGIA									
IDAHO									
ILLINOIS*	X	X	X	X			X		Advisory C on Degree- Institutio Superinten Public Ins Private Sc Accreditat Department Public Ins
INDIANA	X	X	X	X		Professional Specialist Degree			
IOWA	X		X	X				X	
KANSAS									
KENTUCKY	X	X	X						State Boar Business S

PROPRIETARY SCHOOLS AND AUTHORIZATION OF ACADEMIC DEGREES (cont'd.)

State	(A)	(B)	(C)			(D)			(E)	(F)	(G)
	Degrees Authorized	Degrees Granted	Level of Degrees			Authority			Authorizing Agency	Authoritative Criteria	Currently Developing Authorization Plans
			Assoc.	Bacc.	Other	Exec.	Leg.	Const.			
LOUISIANA											
MARYLAND											
MASSACHUSETTS*	X	X	X		Master's	X			Board of Higher Education	X	
MICHIGAN											X
MISSISSIPPI											
MISSOURI	X	X			Ph.D.						
MONTANA											
NEVADA	X	X	X	X	X	X			Commission on Postsecondary Institutional Authority		
NEW HAMPSHIRE*	X	X	X				X		Postsecondary Education Committee	X	
NEW JERSEY*	X		X			X			Board of Higher Education	X	
NEW MEXICO											
NEW YORK*	X	X	X	X			X		State Education Department	X	
NORTH CAROLINA*	X	X	X				X		Board of Governors--University of North Carolina	X	
NORTH DAKOTA											
OHIO	X	X	X	X					Board of Schools & College Regulations	X	
OKLAHOMA											
OREGON*	X	X	X	X			X		Education Coordinating Commission	X	
PENNSYLVANIA*	X	X	X				X		State Board of Education	X	
RHODE ISLAND											



PROPRIETARY SCHOOLS AND AUTHORIZATION OF ACADEMIC DEGREES (cont'd.)

State	(A)	(B)	(C)			(D)			(E)	(F)	(G)
	Degrees Authorized	Degrees Granted	Level of Degrees			Basis of Authority			Authorizing Agency	Authoritative Criteria	Currently Developing Authorization Plans
			Assoc.	Bacc.	Other	Exec.	Leg.	Const.			
SOUTH CAROLINA*	X	X	X					X	State Board of Education	X	
TENNESSEE											
TEXAS	X		No Limitations					X	Coordinating Board, Texas College and Univ. System	Currently Developing	
VERMONT											
VIRGINIA*	X	X	X					X	State Council of Higher Education	X	
WASHINGTON											
WYOMING											
WEST VIRGINIA*	X	X	Occup. Assoc.					X	W. Virginia Board of Regents	X	

degrees.<sup>80</sup> Of these ten, eight have this feature in common: the state-level agencies for higher, or postsecondary education have the capacity to authorize proprietary schools to award degrees.<sup>81</sup> In four of these states, the state-level agencies even have statutory responsibility for governing proprietary schools.<sup>82</sup> It is evident that these states are not comparable to Louisiana in terms of institutional governance, for Louisiana's state-level agency--the Board of Regents--has no authority over proprietary schools. However, these states can serve as models for Louisiana because they have at least some agency responsible for approving or disapproving degrees from proprietaries.

Three states, in particular, have interesting plans for the awarding of associate degrees by **proprietary** institutions. New York, Pennsylvania, and West Virginia provide for the granting of an occupational degree, using criteria similar to the standards of SACS, AICS, and NATTS. In New York, a student may earn the Associate in Occupational Studies;<sup>83</sup> in Pennsylvania, he may earn the Associate in Specialized Business or the Associate in Specialized Technology;<sup>84</sup> in West Virginia, he has available the Associate in Business or the Associate in Technology.<sup>85</sup> None of these states requires a general education component for the granting of occupational degrees.

#### A Proprietary Owner's Opinion

The plans of New York, Pennsylvania, and West Virginia are consistent with the opinion of Jack Jones, the author of "Proprietary Schools as a National

Resource." He applauds the occupational training offered by proprietary institutions and takes a dim view of the desires of some to award academic degrees. In his opinion, career training is essential, thus he finds it

...somewhat ironic that as proprietary schools seek to conform to the collegiate norms of yesteryear, the norms are being abandoned by the colleges themselves. As proprietary schools achieve specific authority to confer college degrees, the desire of college students for such credentials seems to be displaced by their desire to achieve competence.<sup>86</sup>

It is conceivable that Jones would discourage proprietary institutions from awarding any type of degree, but certainly he would consider an occupational associate degree preferable to an academic associate degree.

## CHAPTER THREE

### CONCLUSIONS

From the foregoing discussion, it is evident that current Louisiana laws unintentionally favor non-accredited proprietary schools in the matter of granting associate degrees. Because non-accredited schools are not prohibited from granting degrees, they could begin offering degrees at any time with no sanction. Conversely, some nationally accredited proprietary schools are prohibited from awarding associate degrees because Louisiana lacks the state board required by the accrediting association for authorizing proposed degrees.

The Board of Regents does not advocate this situation. Were non-accredited proprietary schools to begin conferring degrees without authorization, the coordination of Louisiana's educational resources would become needlessly complicated. Louisiana's public colleges and universities already offer 163 associate degree programs, and unauthorized degree programs from non-accredited proprietaries could produce unnecessary duplication. Furthermore, because programs implemented without approval could not be evaluated, the quality of such programs would vary from one proprietary institution to another.

The seventeen nationally accredited proprietary schools in Louisiana have demonstrated a desire for quality through the very act of seeking accreditation. Should proprietary schools in this state be authorized to confer

degrees, it is reasonable that these nationally accredited institutions should be the schools to receive the authority. They should not be denied degree-granting status while non-accredited proprietaries are allowed to award degrees at will.

For these reasons, the Regents make the following recommendations:

- I. That the Louisiana Legislature, by law,
  - A. Expand the authority of the Board of Elementary and Secondary Education, which licenses proprietary schools, to include the responsibility for approval or disapproval of occupational degree proposals from eligible proprietary schools,
  - B. Require that only licensed proprietary schools domiciled in Louisiana and accredited by AICS, NATTS, or SACS be eligible to apply to the Board of Elementary and Secondary Education for occupational degree-granting status,
  - C. Require that the Board of Elementary and Secondary Education revoke the right of a proprietary school to award the occupational degree if the proprietary school loses its accreditation,
  - D. Establish a non-academic, occupational degree entitled, "The Associate in Occupational Studies-(Area of Emphasis)" to be the only degree awarded by eligible proprietary schools. No proprietary school shall award the Associate of Arts or Associate of Science,
  - E. Require that all advertising, recruiting, and publications regarding "The Associate in Occupational Studies" state clearly the degree is non-academic and does not imply, promise, or guarantee transferability,
  - F. Require that each student admitted into the occupational degree program have a high school diploma or equivalent,
  - G. Require that each student complete a minimum of two years, or four semesters, of course work for each occupational degree program, and

- H. Require that each "Associate in Occupational Studies-(Area of Emphasis)" program have a minimum of 75 percent of its courses in the degree's specific occupational area.

These recommendations are consistent with the highest standards of the three previously-discussed accrediting associations. Furthermore, they would, if adopted, create an associate degree program for Louisiana proprietaries similar to programs offered in other states. Finally, the proposed recommendations are offered to give Louisiana's proprietary students recognition for achievement in vocational training without requiring them to conform to academic standards.

The Louisiana Board of Regents encourages the Legislature to request that the Board of Elementary and Secondary Education conduct a similar study pertaining to the granting of the "Associate in Occupational Studies-(Area of Emphasis)" by Louisiana's public vocational-technical schools.

## FOOTNOTES

<sup>1</sup>Wellford W. Wilms, "Profile of Proprietary Students," Lifelong Learners - A New Clientele for Higher Education, ed. Dyckman W. Vermilye (San Francisco: Jossey-Bass Publishers, 1974), p. 35.

<sup>2</sup>For biographical data concerning Trivett and other researchers mentioned within this study, see "Appendices."

<sup>3</sup>David A. Trivett, Proprietary Schools and Postsecondary Education, ERIC/Higher Education Research Report No. 2 (Washington: American Association for Higher Education, 1974), p. 12.

<sup>4</sup>Trivett, p. 8.

<sup>5</sup>Trivett, pp. 1-3.

<sup>6</sup>Wilms, "Profile of Proprietary Students," p. 35.

<sup>7</sup>Wilms, "Profile of Proprietary Students," p. 38.

<sup>8</sup>Richard A. Fulton, "The Proprietary Sector," The Changing Face of Higher Education, Proceedings of the 22nd Legislative Work Conference, Southern Regional Education Board. (Atlanta: Southern Regional Education Board, 1973), p. 5.

<sup>9</sup>Trivett, p. 19.

<sup>10</sup>Jack H. Jones, "Proprietary Schools as a National Resource," The Future in the Making, ed. Dyckman W. Vermilye (San Francisco: Jossey-Bass Publishers, 1973), p. 179.

<sup>11</sup>Trivett, p. 11.

<sup>12</sup>Wilms, "Profile of Proprietary Students," p. 35.

<sup>13</sup>Larry Van Dyne, "Consumer Forces Eye School Abuses," The Chronicle of Higher Education, IX (December 9, 1974), 5

<sup>14</sup>Trivett, p. 19.

<sup>15</sup>Trivett, p. 17.

<sup>16</sup>Lewis B. Mayhew, Higher Education for Occupations, SREB Research Monograph No. 20 (Atlanta: Southern Regional Education Board, 1974), p. 44.

<sup>17</sup>Trivett, p. 16.

<sup>18</sup>Jones, p. 179.

<sup>19</sup>One other accrediting association offers full accreditation to proprietary schools--the National Home Study Council. However, this paper omits home study--or correspondence--schools because only one such institution is headquartered in Louisiana, and it is not accredited. Since this feasibility study focuses upon "nationally accredited proprietary schools," reference to the NHSC is irrelevant in a paper on Louisiana schools.

<sup>20</sup>Trivett, pp. 12-13.

<sup>21</sup>Fulton, p. 5.

<sup>22</sup>Wilms, "Profile of Proprietary Students," p. 37.

<sup>23</sup>Trivett, p. 9.

<sup>24</sup>Wilms, p. 34.

<sup>25</sup>Larry Van Dyne, "Consumer Forces Eye School Abuses," 5

<sup>26</sup>Trivett, pp. 9-10.

<sup>27</sup>Trivett, p. 9.

<sup>28</sup>Wilms, p. 34.

<sup>29</sup>Wilms, p. 36.

<sup>30</sup>Wilms, p. 39.

<sup>31</sup>Wilms, p. 37.

<sup>32</sup>Trivett, p. 18.

<sup>33</sup>Trivett, p. 18.

<sup>34</sup>Trivett, p. 33.

<sup>35</sup>Trivett, p. 33.

<sup>36</sup>Mayhew, p. 46.

<sup>37</sup>Trivett, p. 34.

- <sup>38</sup>Mayhew, p. 45.
- <sup>39</sup>Trivett, p. 20.
- <sup>40</sup>Trivett, p. 20.
- <sup>41</sup>Mayhew, p. 46.
- <sup>42</sup>Trivett, p. 23.
- <sup>43</sup>Trivett, p. 23.
- <sup>44</sup>Wilms, p. 36.
- <sup>45</sup>Wilms, p. 37.
- <sup>46</sup>Jones, p. 179.
- <sup>47</sup>Trivett, p. 23.
- <sup>48</sup>Trivett, p. 33.
- <sup>49</sup>Trivett, p. 4.
- <sup>50</sup>Trivett, p. 17.
- <sup>51</sup>Van Dyne, "Consumer Forces Eye School Abuses," 1.
- <sup>52</sup>Trivett, p. 40.
- <sup>53</sup>Trivett, p. 40.
- <sup>54</sup>Louisiana, Proprietary Schools, Section 3124 (1972)
- <sup>55</sup>Louisiana, Proprietary Schools, Section 3124 (1972)
- <sup>56</sup>Fred F. Harcleroad and Frank G. Dickey, Educational Auditing and Voluntary Institutional Accrediting, ERIC Higher Education Research Report No. 1 (Washington: American Association for Higher Education, 1975), p. 4.
- <sup>57</sup>Frank G. Dickey and Jerry W. Miller, A Current Perspective on Accreditation, ERIC/Higher Education Research Report No. 7 (Washington: American Association for Higher Education, 1972), p. 2.
- <sup>58</sup>Operating Criteria for Accredited Institutions (Washington: The Accrediting Commission of the Association of Independent Colleges and Schools, 1973), p. 18.

<sup>59</sup>Accrediting Documents (Washington: Accrediting Commission of the National Association of Trade and Technical Schools, 1973), Document A, p. 1.

<sup>60</sup>Jones, p. 179.

<sup>61</sup>Proprietary Schools Licensed in the State of Louisiana (Baton Rouge, Louisiana, Proprietary School Commission).

<sup>62</sup>Middle States accredits schools in the Canal Zone, Delaware, the District of Columbia, Maryland, New Jersey, New York, Pennsylvania, Puerto Rico, and the Virgin Islands.

<sup>63</sup>Larry Van Dyne, "Accreditors Drop Ban on Proprietaries," The Chronicle of Higher Education, IX (December 16, 1974), 6.

<sup>64</sup>Based on personal correspondence between Daniel S. Maloney, Director of Evaluation for the N.E. Association of Schools and Colleges, Inc., and Sharon Beard, Deputy Commissioner, Board of Regents, State of Louisiana. New England Association accredits institutions in Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont.

<sup>65</sup>This commission is responsible for accreditation in Arizona, Arkansas, Colorado, Illinois, Indiana, Iowa, Kansas, Michigan, Minnesota, Nebraska, New Mexico, North Dakota, Ohio, Oklahoma, South Dakota, West Virginia, Wisconsin, and Wyoming.

<sup>66</sup>This commission accredits schools and colleges and Alaska, Idaho, Montana, Nevada, Oregon, Utah, and Washington.

<sup>67</sup>Western Association accredits institutions in California, Guam, Hawaii, American Samoa, and Micronesia.

<sup>68</sup>Van Dyne, "Accreditors Drop Ban on Proprietaries," p. 6.

<sup>69</sup>Southern Association is responsible for accreditation in Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee, Texas, Virginia, and Mexico.

<sup>70</sup>Based on personal correspondence between B. E. Childers, Executive Secretary for the Commission on Occupational Education Institutions, and Sharon Beard, Deputy Commissioner, Board of Regents, State of Louisiana.

<sup>71</sup>Standards of the College Delegate Assembly. (Atlanta: The Southern Association of Colleges and Schools, 1974), p. 8.

<sup>72</sup>Policies and Standards of the Delegate Assembly of the Commission on Occupational Education Institutions. (Atlanta: The Southern Association of Colleges and Schools, 1974), p. 4.

<sup>73</sup>Policies and Standards. . .Comm. on Occ. Ed. Insts., p. 3.

<sup>74</sup>Policies and Standards. . .Comm. on Occ. Ed. Insts., p. 13.

<sup>75</sup>Policies and Standards. . .", p. 48.

<sup>76</sup>Operating Criteria for Accredited Institutions, AICS, p. 57.

<sup>77</sup>Accrediting Documents, NATTS, Document S.

<sup>78</sup>Policies and Standards. . .Comm. on Occ. Ed. Insts., SACS, p. 23.

<sup>79</sup>Policies and Standards. . .Comm. on Occ. Ed. Insts., SACS, p. 48.

<sup>80</sup>These states are Connecticut, District of Columbia, Massachusetts, North Carolina, New York, Oregon, Pennsylvania, South Carolina, Virginia, and West Virginia.

<sup>81</sup>These are all of the previously mentioned states except the District of Columbia and South Carolina.

<sup>82</sup>These states are Connecticut, New York, Oregon, and Pennsylvania.

<sup>83</sup>The State Education Department, Bureau of Two-Year College Programs, "Criteria for Associate Degree Power and Vocational School/Program Evaluation, Resident Proprietary Institutions." (New York: The University of the State of New York), p. 1 (mimeographed).

<sup>84</sup>Office of Higher Education, "Pennsylvania's Degree Granting Proprietary Schools, A Report on Higher Education's Fifth Institutional Segment." (Harrisburg: Pennsylvania Department of Education, 1975), p. 8 (mimeographed).

<sup>85</sup>West Virginia Board of Regents, "Policy Bulletin No. 41." (Charleston: West Virginia Board of Regents, 1975), p. 1 (mimeographed).

<sup>86</sup>Jones, p. 181.

APPENDICES

Regular Session, 1975  
House Concurrent Resolution No. 116  
By Mr. Conner

A CONCURRENT RESOLUTION

To urge and request the Board of Regents to conduct feasibility studies relative to the granting of associate degrees by nationally accredited proprietary schools.

WHEREAS, it is in the interest of the people of Louisiana to further the objectives of higher education; and

WHEREAS, there are insufficient data to evaluate the feasibility of nationally accredited proprietary schools granting associate degrees.

THEREFORE, BE IT RESOLVED by the House of Representatives of the Legislature of Louisiana, the Senate thereof concurring, that the Board of Regents is hereby urged and requested to conduct an in-depth study of the feasibility of nationally accredited proprietary schools granting associate degrees.

BE IT FURTHER RESOLVED that the Board of Regents is hereby urged and requested to report its findings and recommendations to the legislature during the 1976 Regular Session.

BE IT FURTHER RESOLVED that copies of this Resolution shall be transmitted to the members of the Board of Regents.

SPEAKER OF THE HOUSE OF REPRESENTATIVES

LIEUTENANT GOVERNOR AND PRESIDENT OF THE SENATE



WILLIAM ARCENEUX  
COMMISSIONER OF HIGHER EDUCATION

State of Louisiana  
BOARD OF REGENTS  
Baton Rouge

70804

CAPITOL STATION  
P. O. BOX 44362

September 12, 1975

MEMORANDUM

TO: SHEEO Members  
FROM: William Arceneaux *WMA*  
RE: Attached Questionnaire

House Concurrent Resolution Number 116 of the regular session of the 1975 Louisiana Legislature requests that the Board of Regents "conduct feasibility studies relative to the granting of associate degrees by nationally accredited proprietary schools." Currently, no proprietary schools in Louisiana grant academic degrees.

To begin this study, the Board staff is surveying the practices of other states regarding the granting of academic awards by proprietary schools. It would greatly benefit our research if you would respond to the attached questionnaire and return it to this office by October 1, 1975. Any additional information that you may wish to offer would be appreciated, especially that pertaining to legislation and regulatory agencies.

For your convenience in responding a stamped, self-addressed envelope is enclosed.

Responding State \_\_\_\_\_  
Responding \_\_\_\_\_  
Address \_\_\_\_\_  
\_\_\_\_\_

Please return by Oct. 1, 1975, to:  
Sharon Beard  
Deputy Commissioner  
Louisiana Board of Regents  
P.O. Box 44362  
Baton Rouge, Louisiana 70804

LOUISIANA BOARD OF REGENTS  
STATE SURVEY  
PROPRIETARY SCHOOLS AND ACADEMIC AWARDS

POLICY INFORMATION

- \_\_\_\_\_ 1. Are proprietary schools in this state authorized to grant academic degrees?
- \_\_\_\_\_ 2. If yes, at what level?
  - \_\_\_\_\_ a. Associate
  - \_\_\_\_\_ b. Baccalaureate
  - \_\_\_\_\_ c. Other (specify)
- \_\_\_\_\_ 3. By what authority do proprietary schools award degrees?
  - \_\_\_\_\_ a. Executive
  - \_\_\_\_\_ b. Legislative
  - \_\_\_\_\_ c. Constitutional
  - \_\_\_\_\_ d. Other (specify)
- \_\_\_\_\_ 4. What state agency is responsible for granting authorization to award degrees to proprietary schools? (Name of agency)
- \_\_\_\_\_ 5. What criteria are used to grant authority to award degrees?

STATISTICAL INFORMATION

- \_\_\_\_\_ 1. What is the total number of approved proprietary schools in this state?
  
- \_\_\_\_\_ 2. How many of these proprietary schools are authorized to award academic degrees?
  
- \_\_\_\_\_ 3. How many associate degrees were awarded in this state by all types of institutions in the following years?
  - \_\_\_\_\_ a. 1972-73 (July 1-June 30)
  - \_\_\_\_\_ b. 1973-74 (July 1-June 30)
  - \_\_\_\_\_ c. 1974-75 (July 1-June 30)
  
- \_\_\_\_\_ 4. How many associate degrees were awarded by authorized proprietary schools in the following years?
  - \_\_\_\_\_ a. 1972-73 (July 1-June 30)
  - \_\_\_\_\_ b. 1973-74 (July 1-June 30)
  - \_\_\_\_\_ c. 1974-75 (July 1-June 30)

SUPPLEMENTARY INFORMATION

Please provide any relevant documents pertaining to degree-granting in proprietary schools (policy statements, legislation, guidelines, research reports).

## BIOGRAPHICAL DATA

Belitsky, A. Harvey

Authored two books on proprietary schools--Private Vocational Schools: Their Emerging Role in Postsecondary Education, and Private Vocational Schools and Their Students: Limited Objectives, Unlimited Opportunities. The first book was sponsored by the W. E. Upjohn Institute for Employment Research.

Erickson, Edward W.

Authored Proprietary Business Schools and Community Colleges: Resource Allocation, Student Needs, and Federal Policies for the Assistant Secretary for Planning and Evaluation, Department of Health, Education and Welfare.

Freeman, Richard B.

Authored "Occupational Training in Proprietary Schools and Technical Institutions," a Harvard University publication.

Hamilton, William J.

Authored The Independent Business School in American Education with Jay Miller.

Jones, Jack H.

Authored "Proprietary Schools as a National Resource," in The Future in the Making. Jones is President of Jones College, a proprietary business school.

Katz, H. H.

Authored A State of the Art Study on the Independent Private School Industry in the State of Illinois for the State of Illinois Advisory Council on Vocational Education.

Mayhew, Lewis B.

Authored three books for the Southern Regional Education Board, Higher Education for Occupations, Changing Practices in Education for the Professions, and Reform in Graduate Education.

Miller, Jay W.

Authored "Independent Business Schools" in Encyclopedia of Education, and co-authored The Independent Business School in American Education with William Hamilton.

Trivett, David A.

Authored "Postsecondary Education: The New Meaning," and Proprietary Schools and Postsecondary Education for the Educational Resources Information Center. Trivett is a research associate at the ERIC Clearinghouse on Higher Education.

Van Dyne, Larry

Reporter for The Chronicle of Higher Education.

Wilms, Wellford W.

Authored "A New Look at Proprietary Schools" in Change magazine, "Proprietary and Public Vocational Students" in ERIC Research Currents, and Public and Proprietary Vocational Training for the Center for Research and Development in Higher Education. Wilms is the project director for the Center for Research and Development.