

EXHIBIT 2



May 23, 2023

Sent to: ravent@floridapoly.edu

Dr. Randy Avent
Florida Polytechnic University
4700 Research Way
Lakeland, FL 33805-8531

Re: Change of Accrediting Agency
OPE ID: 04263400

President Avent:

I am following up on your March 20, 2023, letter to the U.S. Department of Education's Office of Federal Student Aid (FSA) about your request for a change of accrediting agencies for Florida Polytechnic University ("Florida Poly").

As required by 34 C.F.R § 600.11(a)(1), as a first step when an institution seeks to change accrediting agencies, it must submit documents and materials related to its current accreditation or preaccreditation, and all materials demonstrating reasonable cause for such change.

The Department issued guidance relating to the requirements of 34 C.F.R § 600.11 in an Electronic Announcement published on August 15, 2016. This guidance reminded institutions of the requirements for the Department's reasonable cause determination, including the documentation an institution must submit to the Department, and the procedures for submitting such documentation. This guidance was updated by the Department on July 19, 2022, and again on September 26, 2022. *See Dear Colleague Letter ("DCL")* [GEN-22-10](#) and [DCL GEN-22-11](#). The purpose of the updated guidance was to ensure that an institution receives the Department's determination of reasonable cause before it begins "the process of changing its accrediting agency."

To proceed with its reasonable cause review and to better understand Florida Poly's request, the Department requests the following additional information:

1. As part of the motivation to switch accrediting agencies, Florida Poly cites SB 7044, enacted as FS 1008.47, along with other state regulatory changes, which it describes as removing the restriction, and "State colleges and universities the opportunity to pursue accreditation through another agency." It also notes that the Florida Statute "requires that

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institutions must change accreditors upon next reaffirmation or fifth-year report; however, it does not dictate the agency.”

Absent the mandatory language requiring a change of accreditors, would Florida Poly seek an alternative accrediting agency? Please explain.

2. Under FS 1008.47, a public postsecondary institution must seek and obtain accreditation from an accrediting agency or association identified by the Board of Governors or State Board of Education. The Florida Board of Governors (FLBOG) has identified five agencies as suitable new accrediting agencies for institutions in the State University System of Florida: HLC, Middle States Commission on Higher Education ("MSCHE"), New England Commission of Higher Education ("NECHE"), WASC Senior College and University Commission ("WSCUC"), and Northwest Commission on Colleges and Universities ("NWCCU"). Please provide all communications with FLBOG (including all agents, employees, and representatives) or any other person or entity relating or referring to the requirements under FS 1008.47 or Florida Poly's plans to change accrediting agencies.
3. DCL GEN-22-11 requires that an institution provide any substantive correspondence or other communications with the new accrediting agency, including any substantive correspondence or other communications with the agency relating to the institution's planned application. Note that non-substantive communications—such as routine scheduling—do not need to be provided. The letter cites meetings between the Chancellor and Vice Chancellor of the Florida Board of Governors, accreditation liaisons from Florida Poly and University of Central Florida, and the Presidents and senior staff of each of the five eligible institutional accrediting agencies.
 - a. Please provide documentation of any substantive correspondence or other communications with HLC relating to Florida Poly's planned application, as referenced above.
 - b. Please provide documentation of any substantive correspondence or other communications with HLC since your March 20th letter.

Thank you and let me know if you have any questions about these requests.

Sincerely,



Chris Miller
Division Chief
Atlanta School Participation & Financial Analysis Division