



Accrediting Commission of Career Schools and Colleges

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June 26, 2019

ELECTRONIC DELIVERY

██████████
Director
Takoda Institute of Higher Education
1845 East Franklin Avenue
Minneapolis, Minnesota 55404

School #M072435
Warning

Dear ██████████:

At the May 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Outcomes Report and Program Advisory Committee (“PAC”) Report submitted by Takoda Institute of Higher Education (“TIHE”) located in Minneapolis, Minnesota. Upon review of the September 13, 2018 Commission letter and the school’s response, the Commission voted to place TIHE on **Warning** with a subsequent review scheduled for ACCSC’s November 2019 meeting. The reasons for the Commission’s decision and the Commission’s requirements for TIHE to demonstrate compliance are set forth below.

1. TIHE must submit a report on its continued efforts to demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education. TIHE must also be able to support these rates through the school’s verifiable records of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the September 13, 2018 ACCSC letter, the Commission consider the following student achievement rates using a February 2019 Report Date on the Graduation and Employment Charts and added that data to the student achievement information previously reported to ACCSC.

Program	Length In Months	G/E	May 2014 Report Date	July 2016 Report Date**	Feb. 2017 Report Date	March 2018 Report Date	Feb. 2019 Report Date	ACCSC Benchmark Rates
Administrative Professional*	9/6	G	41%	40%	57%	0%	17%	55% /60% / 73%
		E	86%	25%	75%	No rate	0%	66% / 70%
Computer Support Specialist	9	G	██████████	52%	47%	57%	40%	60%
		E	██████████	70%	75%	29%	67%	70%
Patient Services Specialist+	6	G	72%	71%	65%	92%	30%	69% / 73%
		E	62%	57%	55%	55%	33%	66% / 70%

* Originally, this was the 9-month Administrative Assistant program. The program became 6 months effective with the March 2018 Report Date.

+ Formerly, the Health Information & Patient Services Specialist program

** From the 2016 ACCSC Annual Report

As shown in the chart above, the graduation and employment rates for the Administrative Professional, Computer Support Specialist, and Patient Services Specialist Certificate programs all fall below the Commission’s benchmarks. More importantly, the Commission found that despite ACCSC’s formal monitoring of the reported rates of student achievement and concordant institutional actions, and the school’s formal reporting on its continual efforts to enhance and support student achievement, TIHE has been unable to demonstrate a level of improvement that would bring the student achievement rates to an acceptable level as required by accrediting standards. Pursuant to *Section VII (R), Rules of Process and Procedures, Standards of Accreditation* the Commission may take a programmatic action to require a school to cease enrollment in a program or may suspend or revoke the approval of a program when a program fails to demonstrate acceptable rates of student achievement. Further, the Commission concluded

that it is the school’s responsibility to ensure that its programs meet the specific needs of students in the community where the school operates.

In its response, TIHE identified factors that have negatively impacted student achievement rates, to include students’ extreme financial hardships and the trend of students leaving school to return to full-time employment out of financial necessity. The school has been working with the American Indian Opportunity and Industrialization Center to refer students to support services in an effort to provide support for students. In addition, TIHE’s Career Navigators are required to meet with each student at least three times prior to graduation to provide employment assistance. Although TIHE has begun to address some of the factors affecting the school’s student achievement rates, it is evident that comprehensive strategies are needed to address the significantly low rates across the school’s programs.

In order to afford TIHE with an opportunity to further develop its student achievement support strategies in Administrative Professional, Computer Support Specialist, and Patient Services Specialist programs and to document the effectiveness of these strategies on the reported rates of student achievement, the Commission determined that further monitoring is warranted. Accordingly, the Commission directs the school to submit the following:

- a. An updated description of the factors impacting successful student achievement in the Administrative Professional (Certificate), Computer Support Specialist (Certificate), and Patient Services Specialist (Certificate) programs; an updated description of the strategies implemented to overcome those factors; and an analysis and assessment of the effectiveness of the school’s efforts;
- b. Program viability studies for the Administrative Professional, Computer Support Specialist, and Patient Services Specialist programs;
- c. A copy of the school’s Institutional Assessment and Improvement Plan to show TIHE’s detailed plans to monitor and assess the Administrative Professional, Computer Support Specialist, and Patient Services Specialist programs;
- d. Graduation and Employment Charts for the Administrative Professional (Certificate), Computer Support Specialist (Certificate), and Patient Services Specialist (Certificate) programs using a **July 2019 Report Date**;
- e. Summary information for **each** Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
 - i. For each student start, provide the following information:

Student ID#	Program	Start Date	Graduation Date	Withdrawal/ Termination Date

- ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following information:

Student ID#	Program	Start Date	Reason Unavailable	Description of the Documentation on File

- iii. For each graduate classified as employed in the field¹ (line #14), provide the following information:

¹ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

Graduate ID#	Program	Start Date	Employer, Contact, Address, & Ph.#	Date Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ² (i.e., graduate or employer)

iv. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Graduate ID#	Program	Start Date	Description of the Documentation on File

v. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

Graduate ID#	Program	Start Date	Description of the Documentation on File

vi. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following information:

Graduate ID#	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File

and

f. Any additional information, **to include contemporaneous retention, graduation, or employment data**, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.

2. TIHE must submit a report on its continued efforts to demonstrate that the school conducts at least two Program Advisory Committee (“PAC”) meetings annually, one of which is held at the school (*Section II (A)(6)(c), Substantive Standards, Standards of Accreditation*). In response to the ACCSC letter, TIHE provided PAC minutes for the meetings held in 2018. TIHE stated that the school was unable to secure the required participants for a second PAC meeting for some programs during 2018. In an effort to address this issue, TIHE has scheduled four PAC meetings per program for 2019 and is working on recruiting new PAC participants. In light of the school’s challenges with meeting the PAC requirements as stipulated by the *Standards of Accreditation*, the Commission determined that additional information is needed.

Accordingly, the Commission directs the school to submit the following:

- a. A schedule for all PAC Meetings to be held in 2019;
- b. Written and detailed minutes of all PAC meetings held for all programs in 2019 that include:
 - i. A description of all members in attendance (i.e., titles and affiliations);
 - ii. The date, time, and location of the meeting; and
 - iii. A comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee members in compliance with *Section II (A)(6)(e), Substantive Standards, Standards of Accreditation*;³ and

² Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

- c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's PAC requirements.

Warning Restrictions:

Pursuant to *Section VII (K)(9), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Response Requirements:

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

TIHE must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.⁴ If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

TIHE must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before September 25, 2019**. If a response, the required fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before September 25, 2019**, the Commission will consider further appropriate action.

³ Given the student achievement outcomes finding included in this letter (see Item #1), TIHE should place an emphasis on the review and comment of school's graduation and employment rates and the school's efforts to support and enhance those outcomes.

⁴ ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

⁵ ACCSC assesses a \$500 processing fee to a school placed on Warning.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED] or [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED].

Sincerely,

A handwritten signature in blue ink, appearing to read "Michale S. McComis".

Michale S. McComis, Ed.D.

Executive Director

Encl.: ACCSC Institutional Review Cover Sheet