



Accrediting Commission of Career Schools and Colleges

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June 6, 2019

**ELECTRONIC DELIVERY**

██████████  
President  
Mt. Sierra College  
800 Royal Oaks Drive  
Monrovia, California 91016

*School #M069267  
Probation*

Dear ██████████:

At the May 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Commission’s previous action to continue Mt. Sierra College located in Monrovia, California on Warning. Upon review of the December 4, 2018 Commission letter and the school’s response, the Commission voted to place Mt. Sierra College on **Probation** with a subsequent review scheduled for ACCSC’s **November 2019** meeting. The reasons for the Commission’s decision are set forth below.

**History of Commission Review:**

**November 2012**

The Commission considered its previous decision to defer final action of the school’s Application for Renewal of Accreditation and voted to grant the school accreditation for five (5) years with stipulations, which the school later satisfied. The Commission also placed the school on Heightened Monitoring due to graduation rates for the following programs that fell below ACCSC’s benchmark rates:

- Business Administration (BS)
- Business/e-Business (BS)
- Media Arts & Design (BA)

**September 2014**

Upon review of Mt. Sierra College’s Heightened Monitoring response and supplemental 2013 ACCSC Annual Report graduation and employment information, the Commission voted to place the school on Outcomes Reporting due to below-benchmark graduation rates for the following programs:

- Business Administration (BS)
- Business Entrepreneurship (BS)

**June 2015**

Upon review of Mt. Sierra College’s Outcomes Report and supplemental 2014 ACCSC Annual Report graduation and employment information, the Commission voted to continue the school on Outcomes Reporting due to below-benchmark graduation rates for the following programs:

- Business Administration (BS)
- Business Entrepreneurship (BS)
- Media Arts and Design (BA)

### **August 2016**

The Commission voted to accept Mt. Sierra College's Application for a Change of Location and placed the school on Outcomes Reporting due to below-benchmark graduation and employment rates for the Network Communications (BS) program.

### **November 2016**

The Commission voted to continue Mt. Sierra College on Outcomes Reporting due to below-benchmark graduation and employment rates for the following programs:

- Business (BS) – formerly Business Administration
- Business Entrepreneurship (BS)
- Media Arts and Design (BA)

### **August 2017**

The Commission voted to defer final action on Mt. Sierra College's Application for Renewal of Accreditation, Application of a Change of Ownership, and Outcomes Report. The Commission also directed the school to cease enrollments in the Business (BS) program. The Commission requested additional information related to the school's reported rates of student achievement; employment verification; and institutional assessment and improvement planning.

### **February 2018**

Upon review of the September 14, 2017 Commission deferral letter and the school's response, the Commission voted to place Mt. Sierra College on Warning due to items related to student achievement; employment verification; and institutional assessment and improvement planning.

### **November 2018**

Upon review of the April 12, 2018 Commission letter and the school's response, the Commission voted to continue Mt. Sierra College on Warning due to items related to management; student achievement; and employment verification.

### **May 2019 Review:**

1. Mt. Sierra College must demonstrate that the school has adequate management and administrative capacity in place that includes full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). During the timeframe that the school reported below-benchmark student achievement rates, Mt. Sierra College changed ownership twice and since has had multiple school directors. As part of Mt. Sierra College's response to the April 12, 2018 Commission letter reviewed at the November 2018 meeting, the school acknowledged a correlation of the lack of management continuity to poor successful student achievement. As such, the Commission directed the school to provide information to demonstrate that the current management team possesses the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards.

In response to the December 4, 2018 Commission letter, Mt. Sierra College submitted the school's organizational chart and management retention information for all management and administrative staff

employed at the school between January 1, 2018 and February 28, 2019. In reviewing this chart, the Commission noted that although [REDACTED] is not listed, his Staff Personnel Report (“SPR”) shows that he started the position as President in July 2018. Additionally, the school did not include an initial date of employment for [REDACTED] on the chart and did not submit a professional profile or SPR for [REDACTED]. The Commission also found that [REDACTED], all started at the school recently with the initial dates of employment of July 2018, August 2018, and January 2019 respectively. The Commission noted that Mt. Sierra College has employed all of the aforementioned key members of the school’s management team, including [REDACTED] who started in March 2019, for less than one year. The Commission therefore determined that Mt. Sierra College has yet to demonstrate overall continuity of management and administrative capacity through the reasonable retention of the school’s management and administrative staff.

To encourage staff retention, the school indicated that it conducts “Bi-weekly Coffee Chat celebrations [to] honor employees for their hard work and support as well as build morale among the faculty and staff,” convenes weekly leadership meetings, and holds departmental acknowledgements. The Commission, however, found that the school did not provide an analysis as to how these celebrations and meetings impact overall management and administrative staff retention and did not provide strategies with specific goals and assessments of management retention efforts.

Mt. Sierra College also provided a copy of the school’s Institutional Assessment and Improvement Plan (“IAIP”) for 2017-2022. Although the date on the title of the document extends to 2022, overall, the Commission found that the IAIP does not reflect long-term goals for improvement as most of the timelines noted in the IAIP state “ongoing” rather than specific dates. Instead of stating “ongoing,” the timelines should be long enough to implement action items and for results to take effect and with references to specific dates.

In addition, the Commission found that that the IAIP lacks benchmarking in all areas. For example, the school set a goal to “Improve communication among faculty and staff and address campus-wide concerns as well as improve teaching, instructional methodology, and/or classroom management skills by participating in a well-developed in-service.” While the school listed “Attendance roster of attendees,” “Agenda,” and “In-Service surveys” as the measurable benchmarks, the Commission found that these are not actual benchmarks but rather activities or documentation associated with the goal. Examples of benchmarks for this could be the use of survey results, observations, or other comparative data collected by the school that would help to show actual improvement over time, not just that a task was completed.

Management retention and institutional assessment and improvement activities are crucial to the success of an institution. The Commission is concerned about the school’s long history of reported low student achievement rates and therefore considered the management and administrative capacity of the school and the lack of benchmarking in context of the low rates of successful student achievement for the school’s programs. Given the persistently low rates, the Commission again questioned if the long history of low student achievement rates (as stated in item #2 below) is directly related to the many management and ownership changes at the school and the overall short-term tenure of primary management and staff. Although it appears that the current management team members are qualified for their particular roles with an ability lead and manage a post-secondary educational institution, much of the school’s leadership team is comprised of new staff. As such, the Commission is interested in the

school’s efforts to evaluate the administrative needs of the school and an update regarding the results of those efforts.

Based on the foregoing, the Commission directs Mt. Sierra College to submit the following:

- a. An updated current completed organizational chart listing the school’s management and administrative staff;
- b. Management retention information for all management and administrative staff employed at the school between March 1, 2019 and August 31, 2019 using the following format:

Name	Title	Initial Date of Employment	Tenure of Service		Reason for Leaving / Termination (if applicable)
			Yrs.	Mos.	

- c. A description of the school’s efforts to increase retention for management and administrative staff and a summary of the impact of the strategies employed to ensure greater retention going forward;
- d. Minutes of weekly leadership meetings and evidence of management training activities, if applicable;
- e. An updated copy of the school’s institutional assessment and improvement planning document that demonstrates goal setting, benchmarking, and implementation activities in the areas of management; fiscal condition and budget; administrative policies and practices; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes;
- f. A list of institutional improvement activities that took place between March 1, 2019 and August 31, 2019, documentation that the activities occurred, and the specific staff members involved in each improvement activity; and
- g. 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 requirements regarding continuity of management and administrative capacity and ACCSC’s institutional assessment and improvement activities and planning requirements.

2. Mt. Sierra College must demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the December 4, 2018 Commission letter, the school reported the following student achievement rates using a July 2019 Report Date on Graduation and Employment Charts:

Program (Credential)	Length in Months	Mt. Sierra College Graduation Rate	ACCSC Benchmark Graduation Rate	Mt. Sierra College Employment Rate	ACCSC Benchmark Employment Rate
Business (BS)	48	21%	40%	78%	70%
Information Technology (BS) – Concentrations in: <ul style="list-style-type: none"> <li>• Computer Information Technology</li> <li>• Information Security</li> </ul>	48	32%	40%	70%	70%

Program (Credential)	Length in Months	Mt. Sierra College Graduation Rate	ACCSC Benchmark Graduation Rate	Mt. Sierra College Employment Rate	ACCSC Benchmark Employment Rate
Media Arts and Design (BA) – Concentrations in: <ul style="list-style-type: none"> <li>• Game Art &amp; Design</li> <li>• Visual Design</li> </ul>	48	21%	40%	74%	70%
Network Communications (BS)	48	60%	40%	80%	70%

The Commission found that Mt. Sierra College reported the graduation rates highlighted above that fall below ACCSC’s student achievement benchmark rates.<sup>1</sup> The school also provided Graduation and Employment Charts using an April 2020 Report Date<sup>2</sup> with the following student achievement rates “to demonstrate the projected graduation and employment rates of the cohorts from the next report date:”

Program (Credential)	Length in Months	Mt. Sierra College Graduation Rate	ACCSC Benchmark Graduation Rate	Mt. Sierra College Employment Rate	ACCSC Benchmark Employment Rate
Business (BS)	48	30%	40%	64%	70%
Information Technology (BS) – Concentrations in: <ul style="list-style-type: none"> <li>• Computer Information Technology</li> <li>• Information Security</li> </ul>	48	47%	40%	56%	70%
Media Arts and Design (BA) – Concentrations in: <ul style="list-style-type: none"> <li>• Game Art &amp; Design</li> <li>• Visual Design</li> </ul>	48	26%	40%	63%	70%
Network Communications (BS)	48	73%	40%	67%	70%

With the future report date of April 2020, Mt. Sierra College reported improved graduation rates in all of its programs, although the school continued to report graduation rates for the Business (BS) and Media Arts and Design (BA) programs that fall below ACCSC’s benchmark rates. While the school also reported employment rates for all programs that do not meet ACCSC’s benchmark rates, some students on these Graduation and Employment Charts only recently graduated and the school feels that these “cohorts will rise above benchmark in placement” in the next submission.

The Commission reviewed the school’s materials and appreciated the school’s efforts to show improvement over time. The Commission did question, however, whether the employment of two Business program graduates is directly related to the program from which the individual graduated and aligns with a majority of the educational and training objectives of the program. The school reported student [REDACTED] as a Personal Care Assistant with responsibilities as “Personal assistant, motivational coaching, file management, record keeping, customer service management and scheduling.” In addition, the school reported student [REDACTED] as an Athletic Director who trains student athletes. With seven graduates out of nine graduates available for employment reported as

<sup>1</sup> Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

<sup>2</sup> The Commission acknowledged that the April 2020 Report Date is far in the future and that the school’s purpose in using this date was to capture and report on more recent cohorts of students, which the Commission found to be an acceptable approach.

employed in the Business field, moving these students to the “Graduates – Unrelated Occupations” category on the Graduation and Employment Chart would decrease the employment rate from 78% to 56%.

As part of its response, Mt. Sierra College also provided the following retention data using a September 2018 Report Date on the Retention Chart for all student starts from October 2015 through January 2018:

Program	Overall Retention Rate	Retention Rate – 50% Program Completed	Retention Rate – 25% Program Completed	Retention Rate – 15% Program Completed
Business (BS)	38%	*	*	*
Information Technology (BS)	51%	69%	50%	51%
Media Arts and Design (BA)	49%	42%	38%	49%
Network Communications (BS)	0%	0%	0%	0%

\* This information was not included in the response as this portion of the Retention Chart was cut off.

The school also included the following retention data using a March 2019 Report Date on the Retention Chart for all student starts from April 2016 through July 2018:

Program	Overall Retention Rate	Retention Rate – 50% Program Completed	Retention Rate – 25% Program Completed	Retention Rate – 15% Program Completed
Business (BS)	38%	33%	38%	38%
Information Technology (BS)	43%	38%	42%	43%
Media Arts and Design (BA)	50%	43%	50%	50%
Network Communications (BS)	0%	0%	0%	0%

The Commission found that the retention rates remain stagnant between the two charts and that it appears that the school will have difficulty increasing the graduation rates in these programs, particularly the Business program, to meet ACCSC’s graduation rate benchmark in the future. Mt. Sierra College stated the following regarding the school’s retention rates:

*There are two ways the College can report retention as an institution: by cohort and by quarter. Where the former tracks retention of each specific cohort, the latter tracks retention of the active population in the college each quarter. So, although the College retain, on average, 92.22% of the student body each quarter, our retention charts, which are organized by cohort, show a much lower statistic. This is because, with low enrollment, any one person leaving the college won’t really affect the retention rate of the overall active population but will greatly affect the retention rate of that student’s cohort.*

The Commission noted a flaw in the school’s rationale regarding retention rates. The school’s programs are 48 months in length with students presumably attending classes over 16 quarters. Assuming that nearly 8% of the students withdraw per quarter, over 16 quarters, the school would be unable to demonstrate successful student achievement by maintaining acceptable rates of student graduation as the percentage of students who complete the program would fall below the Commission’s benchmark rate.

In addition, as stated in the December 4, 2018 letter, the Commission noted that in some cases students withdrew or were terminated from the school after attending classes for as long as five years. The Commission was therefore interested in why so many students withdrew after spending four or five

years in the program and directed the school to provide an analysis of the reasons why students withdrew or were terminated. In its response, Mt. Sierra College indicated that the school adheres to “a strict attendance policy mandating that students all classes on campus as scheduled without violating the 14-day policy,” and submitted a drop analysis in which many students were terminated for violating the attendance policy. The school also submitted its attendance policy, described steps taken by faculty and school staff when a student is absent, and submitted daily attendance reports. Mt. Sierra College’s attendance policy includes notice that “[s]tudents who come to a class 10 minutes or more after it starts are considered tardy.” The policy also states that “[p]artial attendance is given to students who arrive late or leave early.” In reviewing the attendance records, the Commission found numerous instances which show students arriving late to class, missing portions of classes after break, and leaving early. With the aforementioned questions regarding the school’s ability to retain students, the Commission is interested in how the school’s attendance policies and procedures impact retention rates. In addition, the policy does not appear to include information as to how tardiness or leaving the class early can affect a student’s satisfactory academic progress.

Mt. Sierra College also submitted Program Advisory Committee (“PAC”) minutes from its December 7, 2018 meeting. The school conducts its meetings by holding a general meeting for all of the Program Advisory Committees together and then having separate break-out sessions by program. Although the minutes of the general session show a review of student achievement rates in that the school indicated that it is working on improving retention rates, provided quarterly retention data, and stated that the employment rates meet benchmark, the minutes do not reflect commentary by the PAC members regarding student graduation and graduate employment. In addition, the break-out minutes for the Business and Media Arts meetings do not show any review or comment of student graduation and graduate employment, and the school only submitted an agenda for the technology programs session. Given the history of the school reporting student achievement rates that fall below ACCSC’s benchmarks, as highlighted below, the Commission is interested in ensuring that Mt. Sierra documents the PAC review and commentary of student achievement rates for all programs. Please note that PAC meeting minutes must include the date, time, and location of the meeting.

Overall, the Commission found that Mt. Sierra College reported graduation rates for the Business (BS) and Media Arts and Design programs over a nearly an eight year period that fell below ACCSC’s benchmark rates<sup>3</sup> as follows:

Program	July 2012 RD	April 2014 RD	May 2015 RD	July 2016 RD	July 2017 RD	Dec 2017 RD	Sept. 2018 RD	July 2019 RD	April 2020 RD
Business <sup>4</sup>	25%	24%	30%	29%	25%	18%	25%	21%	30%
Media Arts & Design	29%	32%	27% <sup>+</sup>	16%	31%	30%	26%	21%	26%

<sup>+</sup> Using a March 2015 Report Date RD=Report Date

In addition, the retention information discussed above does not show a path as to how or when the school will report graduation rates for the Business program to meet ACCSC’s benchmark rates. As such, **the cease enrollment directive for the Business program per the September 14, 2017 ACCSC letter remains intact.** Although the retention data for the Media Arts and Design program has improved, the Commission also remains concerned about the viability of the Media Arts and Design

<sup>3</sup> The established benchmark employment rate increased from 32% to 36% effective for all Graduation and Employment (“G&E”) Charts using a July 2014 Report Date and later. The rate increased to 40% effective for all G&E Charts using a July 2016 Report Date and later.

<sup>4</sup> Formerly Business Administration.

program given the five-year history of the school reporting below-benchmark graduation rates for this program.

Per the history of the Commission review noted at the beginning of this letter, the Commission provided the school with numerous opportunities to identify and assess the factors impacting the rates of student achievement, to further develop its student achievement strategies, and to document the effectiveness of its efforts to improve student achievement in light of the student achievement rates that fall below the Commission's benchmarks. It does not appear that the school has successfully developed such strategies to improve student achievement rates, particularly for the Business and Media Arts and Design programs. In addition, the Commission questioned whether the school's management has conducted an effective assessment in identifying the root cause of student achievement issues or whether the school's management has been able to develop an effective plan of action to improve student success and devoted sufficient resources to the implementation of an effective plan of action.

Based on the forgoing, the Commission directs Mt. Sierra College to provide the following:

- a. A copy of the school's student achievement improvement plan for its programs. Specifically the school should address any modifications or improvements implemented in the following areas:
  - Admissions requirements and process;
  - Curriculum modifications;
  - Student Services;
  - Career services and employer engagement;
  - Management and staff involvement in student achievement assessment and plans for improvement; and
  - Evaluation of current retention trends and employment trends including an assessment as to when student achievement rates are expected to meet ACCSC's benchmark rates.
- b. A copy of the school's attendance policy and evidence that the school adheres to this policy. This should include a description of how tardiness and leaving early impacts student attendance and the student academic progress.
- c. Minutes from all PAC meetings hosted since March 8, 2019. These minutes must include the date, time, and location of each meeting as well as a comprehensive and clear description of the review of and commentary made by each of the school's PAC, and **must emphasize the review and commentary regarding student achievement outcomes**.
- d. Retention Charts for **all programs** using an August 2019 Report Date as follows:
  - i. Updated Retention Charts from those submitted in response to the December 4, 2018 Commission letter for all student starts beginning in April 2016 through July 2018 and
  - ii. New Retention Charts for cohorts who started after July 2018.
- e. Graduation and Employment Charts for **all programs** using an **April 2020 Report Date**.
- f. 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# <sup>5</sup>	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 field<sup>6</sup> (line #14), provide the following information:

Graduate ID#	Program	Start Date	Employer, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification <sup>7</sup> (i.e., graduate or employer)

- iv. Supporting and verifiable documentation or a narrative justification for each graduate in (iii.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.
- v. 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

- vi. From the list in (iii.) 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

- vii. 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

- g. Any additional information, to include contemporaneous retention, graduation, or employment data or rates, that will help to demonstrate acceptable levels of student achievement in the school’s programs 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.

3. Mt. Sierra College must demonstrate that the Commission can place a high level of reliance upon information, data, and statements provided by the school through supplying verifiable records of each graduate initial employment (*Preamble, Introduction, Rules of Process and Procedure; Section VI*

<sup>5</sup> Do not submit Social Security Numbers. If the school uses the student’s Social Security Number as the Student ID, then provide the student’s name in lieu of the student ID number.

<sup>6</sup> See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

<sup>7</sup> *Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation* requires the school to verify the employment classification.

(C)(2), *Substantive Standards, Standards of Accreditation*). The school must also support its reported rates of graduate employment by maintaining verifiable records of initial employment (*Section VI (C)(2) and Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the December 4, 2018 Warning letter, Mt. Sierra College submitted a copy of its revised Career Services Policy Manual, effective January 1, 2019, and blank copies of the employment verification forms. In response to the Commission's request to submit employment verification information for graduates who obtained training-related employment between January 1, 2019 and February 28, 2019, the school indicated that there were no such students during this timeframe. Instead, the school listed nine students expected to graduate in March 2019 and indicated that three of these students already earned employment in the trained field. While Mt. Sierra College stated that the school included completed employment verification forms for the three students, it is unclear that the three verification forms were included as part of the school's submission. Specifically, the school provided employment verification documentation for ten students referenced by name in the December 4, 2018 letter, but the Commission directed the school to provide employment verification information for graduates who obtained training-related employment between January 1, 2019 and February 28, 2019 using only a graduate identification number. However, the graduation dates recorded on the verification forms provided occurred before March 2019, so it appears that the school did not submit employment verification information for the three students.

Furthermore, in reviewing the employment verification documentation for the students referenced in the December 4, 2018 letter, the Commission noted the following:

- The employment verification form for [REDACTED] does not show that the student gained training-related employment. Although the student signed the form attesting to self-employment per ACCSC's *Guidelines for Employment Classification*, the "Projects and Opportunities" portion of the form shows two freelance projects, both as "interview only."
- The employment verification form for [REDACTED] includes a portion asking how much time on the job is spent utilizing the skills taught in the program. The employer or graduate selected the 20-49% option which brings into question whether the employment is directly related to the program from which the individual graduated and aligns with a majority of the educational and training objectives of the program.
- The employment verification form for [REDACTED] shows income received as \$120 for the only project listed. This amount brings into question whether the employment can be considered sustainable.
- The school submitted a letter from Siemens showing that [REDACTED] (as listed on Mt. Sierra College's verification form) started at the company on March 30, 2015. With the employment verification form showing this student as starting at the school in April 2014 and graduating in June 2018, the Commission noted that the career advancement portion of the form was not complete.

While the Commission recognized Mt. Sierra College's efforts in verifying initial employment, the Commission noted that the school did not provide verifiable records of initial employment for recent graduates and found that the school again did not submit verifiable records of initial employment for the aforementioned graduates.

Based on the foregoing, the Commission directs Mt. Sierra College to submit the following:

- a. A description of any updates to the school’s process and procedures for recording and verifying graduate employment, if applicable;
- b. For each graduate that the school has identified as employed in the career field for which the school provided education between March 1, 2019 and July 31, 2019, submit the following information:

Graduate Name	Program	Start Date	Employer, Address, & Phone#	Date of Initial Employ	Descriptive Job Title

- c. The following supplementary information:
  - i. A copy of the school’s completed verification form (as indicated in item a. above) for each graduate employed listed in b. above;
  - ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:
    - The graduate’s name and contact information;
    - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
    - An attestation that the graduate is earning training-related income; and
    - In cases where licensure is required for employment, an attestation that such licensure has been achieved; and
  - iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school; and
- d. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s employment verification requirements.

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**Probation Requirements:**

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of

accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with *Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation*, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school's federal financial aid responsibilities.

In accordance with *Section VII (L)(8), Rules of Process and Procedure, Standards of Accreditation*, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission's website.

#### **Maximum Timeframe To Achieve Compliance:**

Based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and the school's longest program of forty-eight months, the maximum timeframe allowed for Mt. Sierra College to achieve and demonstrate compliance with the *Standards of Accreditation* is two years. Thus, the timeframe to achieve compliance began on April 12, 2018 and ends on April 12, 2020. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

#### **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.

Mt. Sierra College 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.<sup>8</sup> 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.

Mt. Sierra College 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](#).

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<sup>8</sup> 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](http://www.accsc.org).

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 12, 2019**. If a response, the required fee,<sup>9</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before September 12, 2019**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [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 [REDACTED] or [REDACTED]

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director

c: [REDACTED]  
[REDACTED]

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<sup>9</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation. The school will receive an invoice separately.