

September 6, 2018

ELECTRONIC DELIVERY

██████████
Chief Executive Officer
Center for Excellence in Higher Education, Inc.
4021 South 700 East, Suite 400
Salt Lake City, Utah 84107

***System-Wide Review
Probation Order***

Dear ██████████

At the May 2018 meeting and a September 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the renewal of accreditation applications, substantive change applications, and supplemental data to the 2017 Annual Report for nine ACCSC-accredited schools in the Center for Excellence in Higher Education (“CEHE”) system of schools (see Appendix I included as part of this letter for a list of institutions, actions and materials considered).¹ The Commission’s action is effective as of the date of this letter. The institutions covered by the Commission’s action are listed below:

California College San Diego (“CCSD”) – San Diego, California (#M001073/SL460488-National City, California)

- California College San Diego – San Marcos, California (#B072374)

CollegeAmerica (“CA-Denver”) – Denver, Colorado (#M001507)

- CollegeAmerica (“CA-Fort Collins”) – Fort Collins, Colorado (#B070544)
- CollegeAmerica (“CA-Colorado Springs”) – Colorado Springs, Colorado (#B070623)

CollegeAmerica (“CA-Flagstaff”) – Flagstaff, Arizona (#M070742)

- CollegeAmerica (“CA-Phoenix”) – Phoenix, Arizona (#B070743)
- Stevens-Henager College (“SHC-Idaho Falls”) – Idaho (#B072351)

Stevens-Henager College (“SHC-West Haven”) – West Haven, Utah (#M070581)

- Stevens-Henager College (“SHC-Orem”) – Orem, Utah (#B070582)
- Stevens-Henager College (“SHC-Murray”) – Murray, Utah (#B070583)
- Stevens-Henager College (“SHC-Logan”) – Logan, Utah (#B070584)
- Stevens-Henager College (“SHC-Boise”) – Boise, Idaho (#B070764)
- Independence University (“IU-Salt Lake City”) – Salt Lake City, Utah (#B072309)
- Stevens-Henager College (“SHC-St. George”) – St. George, Utah (#B072360)

¹ The Commission is also in receipt of the Request for a Waiver of an Accreditation Standard or Policy submitted by CEHE. Upon review of the request the Commission voted to review and consider that request in conjunction with the school’s response to this letter. In addition the Commission received a number of substantive change applications which will be held in abeyance until the resolution of this Probation.

History of the Commission’s Review:

April 20, 2012 Commission Letter

The Commission considered the school’s notification regarding the Good Neighbor Initiative and determined that additional information is needed to verify the school is operating in compliance with accrediting standards.

July 18, 2012 Commission Letter

At the June 2012 meeting, the Commission considered the school’s response to the April 20, 2012 letter requesting additional information regarding the school’s “Good Neighbor Initiative,” in context of anonymous complaints dated May 2, May 3, May 18, May 20, and May 31, 2012.

August 10, 2012 Commission Letter

ACCSC sent a letter to CollegeAmerica-Denver on August 10, 2012, requesting documentation of compliance with regard to a notice from the Colorado Board of Private Occupational Schools (“CBPOS”) disclosing that CBPOS voted to file a “Notice of Charges” and to proceed with an “administrative hearing seeking revocation of the school’s certificate of approval to operate in the state of Colorado; as well as four other anonymous complaints with overlapping concerns, dated May 18, 2012; May 24, 2012; June 19, 2012; and July 12, 2012.

September 20, 2012 Commission Letter

The Commission considered five complaints against CollegeAmerica Services and voted to defer final action for additional information on the school’s response to anonymous complaints dated May 2, 2012, May 3, May 18, May 20, and May 31, 2012. Specifically, the Commission directed the CollegeAmerica to provide additional information regarding:

- The payment of cash or other consideration to any prospective student as an inducement to enroll;
- The reliability of statements made by CollegeAmerica Services, Inc.;
- The availability of all required courses (e.g., externships);
- The awarding and application of scholarship funds;
- The focus of recruitment efforts; and
- Past records of integrity of the owners, managers, and administrative employees.

March 5, 2013 Commission Letter

As part of the system-wide review of ACCSC-accredited schools owned by CollegeAmerica Services, Inc., the Commission considered the following documentation concerning the ACCSC-accredited schools operated by CollegeAmerica Services, Inc. (CollegeAmerica):

- The Commission’s August 10, 2012 letter and CollegeAmerica’s September 17, 2012 response
- The Commission’s September 20, 2012 letter and CollegeAmerica’s October 24, 2012 response to the Commission
- CollegeAmerica’s January 10, 2013 notification to the Commission regarding the materials subpoenaed by the Colorado AG’s office.

Upon review of the current record on these matters, the Commission voted to defer action and to direct CollegeAmerica to submit additional information to demonstrate the school's compliance with accrediting standards as set forth in the attached letter.

July 12, 2013 ACCSC Show Cause Order

At the May 2013 Commission meeting ACCSC considered to the applications for renewal of accreditation, applications, substantive change applications, complaint notices, and other actions for the ACCSC-accredited schools in the CEHE system of schools. Upon review of the record in these matters, the Commission expressed concern as to whether there are systemic issues with regard to recruitment, admissions, student achievement, advertising, state licensure, and cohort default rates throughout the CEHE schools under consideration and voted to direct the CEHE system of schools to **show cause** as to why accreditation should not be withdrawn.

December 13, 2013 Vacate SW Show Cause Order; Place on SW Advertising Reporting

At the November 2013 meeting, the Commission vacated the system-wide (“SW”) show cause order, but **continued the show cause order for CA-Denver**. In addition, the Commission determined that additional review of CEHE's advertising was warranted to ensure that CEHE continued to adhere to accrediting standards. The Commission voted to place the system of schools on Advertising Reporting, which includes CollegeAmerica in Denver.

May 2, 2014 Commission Letter

CEHE notified ACCSC regarding a complaint filed by the U.S. Department of Justice under the federal False Claims Act relating to recruiting tactics.

December 23, 2014 Commission Letter

At the June 2014 meeting, ACCSC considered the response to the Commission's May 2, 2014 letter submitted by CEHE regarding the complaint filed by the U.S. Department of Justice under the federal False Claims Act against CEHE, its affiliated schools, and Chairman [REDACTED]. Upon review of CEHE's response, the Commission voted to place CEHE on Litigation Reporting.

March 25, 2015 Continued Litigation Reporting Letter

The Commission voted to continue CEHE on Litigation Reporting regarding complaint filed by the U.S. Department of Justice under the federal False Claims Act against CEHE.

October 8, 2015 Commission Letter

At the May 2015 meeting, the Commission voted to continue CEHE on Advertising Reporting given ongoing questions regarding the school's advertising practices.

September 25, 2015 Commission Letter

(At this meeting the complaints from the DOJ and COAG were merged)

The Commission voted to continue CEHE on Litigation Reporting given the open status of the complaint filed by the U.S. Department of Justice under the federal False Claims Act and the complaint filed by the State of Colorado.

May 18, 2016 Letter

(At the February 2016 meeting the actions were merged because of the nature of the advertising and the complaints from the DOJ and CO)

The Commission voted to continue CEHE on Adverting / Litigation Reporting given the open status of the complaint filed by the U.S. Department of Justice under the federal False Claims Act against CEHE, its affiliate schools, and Chairman [REDACTED]

July 14, 2016 Commission Letter

ACCSC was copied on the May 11, 2016 notice from the U.S. Department of Education (“the Department”) to the CEHE located in Salt Lake City, Utah and its affiliated schools. The notice discloses that CEHE’s non-profit status application remains pending and as such, CEHE continues to be subject to all federal student aid requirements applicable to proprietary institutions of higher education. The notice also states that “[a] review of the web pages for some of your institutions suggests that CEHE is not providing the required GE disclosures for its programs, and this must be addressed immediately.” In addition, the notice references a March 15, 2016 letter to CEHE and underlines that it is “imperative that CEHE demonstrate compliance with these conditions and provide the information requested in the March 15, 2016 letter to CEHE from Mr. [REDACTED].”

November 17, 2016

At the November 2016 meeting, ACCSC considered two complaints regarding CEHE and its affiliated schools. Upon review of the complaints, the Commission voted to process the complaints in accordance with *Section VI, Rules of Process and Procedure, Standards of Accreditation*. The Commission received two complaints dated September 15, 2016 and October 13, 2016 alleging that CEHE is aggressively recruiting displaced ITT students in an “unethical” manner. Also, the complaints allege that CEHE’s recruiters are not fully and accurately disclosing CEHE’s accredited status³ and policies and procedures pertaining to CEHE’s transfer of credit practices. In reviewing the complaints, the Commission also reviewed CEHE websites and found that CEHE is in fact actively and explicitly pursuing displaced ITT students as well as other students from schools that have closed precipitously. While the Commission recognizes the importance of assisting students displaced as result of sudden school closures, the Commission cannot overlook that the Commission has expressed in the recent past its own concern and taken significant action with regard to CEHE’s recruitment and advertising tactics and that CEHE is currently engaged in a complaint filed by the Colorado Attorney General’s Office regarding alleged violations of Colorado’s consumer protection laws as well as a Qui Tam lawsuit filed by the U.S. Department of Justice also relating to recruiting tactics. Given those circumstances, the Commission found the recurrence of complaints regarding recruiting and adverting tactics to be of concern once again.

Based on the seriousness of this matter and out of an abundance of caution as it pertains to student protection, the Commission determined that while these complaints are being reviewed by ACCSC, CEHE must cease and desist from any direct recruitment of displaced ITT students or from any other school that may have recently closed. CEHE must immediately remove from its catalogs, promotional materials, and websites any references and/or advertising specifically directed to displaced ITT students or any other students from schools that have recently closed. In addition, given the specific allegations in the complaints regarding the disclosure of the Warning status for the CollegeAmerica schools in Colorado, each CollegeAmerica campus must immediately inform all current of the schools’ Warning status with ACCSC as well as informing on a continuing basis all prospective students

January 26, 2017 Letter

At the November 2016 meeting, the Commission voted to continue CEHE on Litigation and Advertising Report given the open status of the legal matters.

April 7, 2017 Letter

At the February 2017 meeting, the Commission considered the responses submitted by CEHE and its affiliated schools as it pertains to the November 7, 2016 Commission letter requesting an update on the CEHE application for non-profit status with the Department and the Commission's November 17, 2016 letter regarding two anonymous complaints received regarding CEHE's recruitment practices of displaced ITT Technical Institute students. Upon review of the entire record, the Commission voted to accept CEHE's responses. In doing so, the Commission stated its concerns with regard to complaints and the manner of CEHE's advertising and recruiting methods as follows:

...because the complaint and information received by ACCSC staff were anonymous and the school's response provided a conflicting narrative, there is no way for the Commission to discern the truth of the matter. Therefore, the Commission voted to lift the cease and desist directive, although the Commission also believes that CEHE's methods of direct marketing to displaced ITT students created an environment ripe for such allegations to be made. Moreover, the Commission has a significant historical record of complaints lodged against CEHE pertaining to its advertising and recruiting methods, so much so that it has become a familiar process of reviewing yet another allegation against CEHE. Given that history and the number of complaints received and reviewed by ACCSC over the years pertaining to CEHE's advertising and recruiting methods as well as the pending litigation that also relates to such matters, the Commission unequivocally expects that the CEHE and its affiliated schools will take better and special care to ensure that advertising and recruiting methods meet both the spirit and intent of ACCSC's accreditation requirements and do not create ambiguity, misrepresentations, or mislead students before or during the recruitment or enrollment processes. The Commission's tolerance has been worn and the next step will be to institute a system-wide action to monitor CEHE-affiliated schools and the advertising and recruiting methods used. Such action can include placing the system of schools on Warning or

January 4, 2017 Letter

At its December 2016 conference call ACCSC considered the December 12, 2016 request from CEHE that schools within the CEHE system currently on Warning² not be required to disclose that status to students as directed by the Commission on November 17, 2016. The Commission denied this request.

In reaching this decision the Commission determined that counter to CEHE's argument, the primary reason for requiring the disclosure of Warning status to students is to ensure that students are fully informed of a school's status with ACCSC – the timing and reason for the Commission's review in November 2016 are not relevant to the question as to whether students should be informed of a school's Warning status. The Commission disagrees with CEHE's assertion that it is "inappropriate, unfair, and capricious" to require the disclosure of the school's current status to students – the fact of the matter is that there are CEHE-affiliated schools on Warning and the Commission believes that students should be made aware of that fact.

² CollegeAmerica schools located in Denver, Colorado (#M001507); Fort Collins, Colorado (#B070544); Colorado Springs, Colorado (#B070623); and Cheyenne, Wyoming (#B070905).

November 2017

The Commission voted to continue CEHE on Litigation and Advertising Report given the open status of the legal matters.

August 2017

At the August 2017 meeting, the Commission considered the response as it pertains to the April 27, 2017 Warning Order issued to CollegeAmerica located in Denver, Colorado (School M001507) and its branches in Fort Collins (School B070544) and Colorado Springs (B070623). Included as part of the Warning letter, the Commission directed CollegeAmerica in Denver and CollegeAmerica in Fort Collins to undergo a total re-evaluation and directed CollegeAmerica in Denver to cease enrollment and teach out all remaining baccalaureate degree programs. Upon review of the record, the Commission continued the Warning Order due to ongoing non-compliance in the area of student achievement outcomes (refer to letter dated February 12, 2018).

SUMMARY OF THE COMMISSION'S ACTION

As stated in the *Introduction to the Standards of Accreditation*:

...the Commission concerns itself with inputs (the kinds of students in the school and the recruiting, admission, and testing procedures that produce them); resources (instructors, equipment, library, etc.), and processes (how the school actually operates). All of these conditions are evaluated within the context of the school's stated mission and its demonstrated achievements. Two important outcomes that the Commission uses in its assessment process are student graduation rates and graduate employment rates. The Commission is concerned about employer satisfaction, student satisfaction, and student success over time. Accordingly, the Commission is concerned about outcomes related to specific skills, knowledge, competencies, and behaviors achieved by students as a direct result of participation in a training program. The Commission believes that both the inputs and the outcomes are essential factors in institutional and student success and as such expects that schools comply with both the input and outcome standards.

The Commission found that the record shows that the inputs, resources, and processes of CEHE schools are designed and implemented in a manner that is not designed for student success. CEHE's advertising and recruitment tactics coupled with a poorly documented admissions process has fostered the creation of a student population that the schools are ill-prepared to educate. In addition to questions regarding the length and educational objectives of certain programs, the record before ACCSC raises significant questions about the schools' delivery of all of its program offerings. The Commission suspects that the result of the CEHE's focus on recruitment and lack of attention to educational quality is evidenced by the widespread and persistent below-benchmark rates of graduation and employment reported throughout the system of CEHE-affiliated institutions. In addition, the school's practices with regard to transferring students and employment classifications may in fact be preventing the Commission from a more fulsome opportunity to determine whether they are truly an accurate depiction of student success. Overall, the Commission found CEHE's response to be dismissive of the schools' responsibilities to the students and to the accrediting process. Of particular note is the attempt by CA-Flagstaff to blame low rates of student success on the ethnic culture of its students. The character of that response portrays an institutional disregard of the school's responsibility for addressing the needs of the students admitted by the school from the very community the school has elected to serve, which is a fundamental expectation of ACCSC accreditation.

The Commission also found the record to reflect CEHE’s lack of engagement in a meaningful self-assessment process. As stated in the Preamble to the Standards of Accreditation:

By applying for and receiving accreditation, a school accepts the obligation to demonstrate compliance with the Standards of Accreditation. A fundamental component required for this demonstration is self-evaluation. Self-evaluation is an assessment of the complete school, conducted by faculty and students, as well as by the school administration. The process should involve the entire school. The self-evaluation process provides an opportunity for the staff and faculty of the school, whether it is a small, highly specialized school or a large, departmentalized school, to examine itself and to draft findings and recommendations for its own action. Compliance with accrediting standards and improvements within a school should be due primarily to its internal efforts rather than due to an on-site evaluation by an outside team or Commission action. The Commission expects the process of self-evaluation to be a significant and ongoing experience. Schools should incorporate the self-evaluation process as a permanent part of the institution’s operation.

It is not clear that compliance with accrediting standards is due to the schools’ internal efforts. A review of the compliance records for the schools shows repeated actions and system-wide actions related to questionable practices regarding advertising, recruitment, and admissions, and pervasive student achievement outcomes that do not meet ACCSC’s benchmarks. Rather than accepting responsibility for creating systems that drive best practice and compliance with accrediting standards, it appears that CEHE is relying on on-site evaluation teams and Commission actions to drive the system’s compliance.

Overall, it is not clear that CEHE agrees “to support the accreditation process,” or to meet or exceed the *Standards of Accreditation* throughout the application and accreditation period,” as required by the *Standards of Accreditation*. The responses to on-site evaluation team findings routinely consist of attacking the validity of a standard, the application of a standard, and the actions of on-site evaluation team and ACCSC-staff members. The character of the responses portrays an institutional culture of disregard of the school’s responsibility to support the accreditation process and to meet the *Standards of Accreditation*. At this junction, the Commission questions whether the CEHE system of schools is misaligned with ACCSC’s mission and purpose to an irremediable extent. Therefore, the Commission voted to place the CEHE system of schools on Probation with a subsequent review scheduled for the February 2019 meeting. The critical focus of that review and the Commission’s next decision will be CEHE’s ability to demonstrate a commitment to student success and a commitment to supporting ACCSC’s mission and purpose.

COMMISSION FINDINGS

1. CEHE failed to demonstrate that the school accurately represents the rights, responsibilities, and obligations of both the student and the school under the enrollment agreement that appears to be used by several if not all CEHE-affiliated schools (*Section IV (B)(1) and Section IV (C)(2)(c), Substantive Standards, Standards of Accreditation*). At issue is the 90-day “verification period” described in the enrollment agreement. This provision encourages students to re-read, question, and investigate any information received during the admission and financial aid process, and stipulates if the student discovers any misrepresentation upon which they relied on to enroll, they may terminate their enrollment without any liability and obtain a full refund of all monies paid. Once the 90-day “verification period” has expired, the student ostensibly forfeits the ability to take any further action with regard to any misrepresentation, stated as follows:

If you do not bring to our attention any misinformation or misrepresentation in writing by 5:00PM on the last day of the verification period, you forever and completely release and exempt the college from any and all liability as a result of any such representation.

As noted in the TSR for SHC-West Haven, “[f]or a student enrolled in a 20-36 month program, the first 90 calendar days represents a small proportion of the student’s experience with the school and does not seem sufficient to compare the way in which the program and services of the institution were represented to the entirety of the actual experience. For example, during the 90-day initial period, the student will not have had an opportunity to experience the career assistance services, a critical part of how the school is represented.” In response, the schools stated the following:

The college completely disagrees with the Team’s finding. First of all, as ACCSC and the college well know, there is no language that a college can have in its Enrollment Agreement, Catalog, Advertising, or anywhere else that, makes the college “exempt from any liability.” Glaring evidence of this fact is that CollegeAmerica’s campuses in Colorado (which use the exact same Enrollment Agreement as the Flagstaff campus) recently concluded a 5 week trial in Colorado where CollegeAmerica defended itself against allegations from the Colorado Attorney General that the college engaged in misrepresentation. Obviously, the “90-day” language in CollegeAmerica’s Enrollment Agreement did not exempt the college from these allegations, four years of litigation discovery, a five week trial, and millions of dollars of legal expense!! Clearly, no one on this Visit Team was a lawyer or legal expert and their attempt to “interpret” this legal language as some kind of evidence that students cannot make an informed and considered enrollment decision should be summarily rejected. There is nothing in this language that inaccurately describes the school, there is nothing in this statement that is inaccurate, and there is nothing in this statement that prevents a prospective student from making and [sic] informed and considered enrollment decision.

This language in the Enrollment Agreement IS NOT part of the college’s policy to comply with Section IV (A)(8) and the Team’s assumption that this language is somehow tied to the school’s policies and procedures for ensuring personnel do not make exaggerated or misleading statements is wrong. The purpose of this language in the Enrollment Agreement is twofold. First, we want to emphasize to new students that it is critical and important for them to re-read, question, and understand all of the information that they received during the enrollment and financial aid process. And, if the student finds something that was untrue or misrepresented, they can cancel their enrollment and not incur any costs.

The second purpose of this language is to potentially assist the college in a legal defense should the college ever have to defend itself against legal action by a former student who makes up lies, fabrications, or exaggerations about what was said or told to them during the admissions and/or financial aid process.

The Commission found that the school’s explanation and defense of this provision reveals a disregard for the rights of students who invest time and money in pursuing education at CEHE schools. These students must be able to rely on statements made by the schools, in particular the written legal contract which is intended to inform students of their rights. The Commission is not persuaded by CEHE’s argument that because the policy cannot be enforced, the schools should be allowed to continue to use this provision. To the contrary, it is the Commission’s position that to do so would condone the practice of misrepresenting the schools’ obligation to address any issue of misrepresentation, whenever it is raised. By attempting to establish a limitation of 90 days on students’ rights to redress, CEHE appears to be interested primarily in protecting the schools rather than in fulfilling the schools’ obligations to students. The claim that the purpose of the provision is to

both assist students and to “potentially assist the college in a legal defense” seem to serve cross-purposes and as such is not persuasive. CEHE’s response states that the schools purposely impose a policy on students that CEHE **knows** cannot be enforced. CEHE states that the students, like the ACCSC team, are not “lawyer[s] or legal expert[s]” and yet has a practice asking students to sign a documents that they “forever and completely release and exempt the college from any and all liability as a result of any such representation.” Thus, a student who finds misinformation after the 90-day period will likely not know that the provision is unenforceable and so will not come forward. The Commission found that for a school to have a policy that curtails student rights – a policy that the school also knows and admits to being unenforceable – is an unacceptable practice. *Section IV (C)(2)(c), Substantive Standards, Standards of Accreditation* specifically states that each applicant is fully informed of their rights.

Based on the foregoing, the Commission directs CEHE to remove the statement from the enrollment agreement, cease this practice at each campus, and to provide the following:

- a. A copy of the updated enrollment agreement in use at each campus;
 - b. The 10 most recently executed enrollment agreements at each campus for each program to demonstrate that a new enrollment agreement has been implemented; and
 - c. Evidence to demonstrate that all currently enrolled students have been made aware that the above-mentioned policy is no longer in effect.
2. CEHE did not demonstrate that the schools are able to advertise in a truthful and accurate manner and that the schools take care to avoid creating any false, misleading, misrepresenting, or exaggerated impressions on prospective students (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). CEHE’s advertising and recruitment practices have been subject to the Commission’s scrutiny over the last five years, as outlined in the table below.

Commission Meeting	Letter Date	Action
May 2013	July 12, 2013	Advertising is among the reasons for the System-Wide Show Cause Order
November 2013	December 13, 2013	System-Wide Reporting Enclosure
May 2015	October 8, 2015	Continue on Advertising Reporting
February 2016	May 18, 2016	Continue on Advertising Reporting
November 2016	January 26, 2017	Continue on Advertising Reporting
February 2017	April 7, 2017	Complaint Review
November 2017	April 17, 2018	Continue on Litigation and Advertising Reporting

Although CEHE claims to have discontinued or revised advertising identified as non-compliant by the Commission, CEHE has not demonstrated success in independently developing advertising practices that align with ACCSC’s *Standards of Accreditation* on an ongoing basis. By letter dated April 7, 2017, the Commission communicated its position with regard to CEHE’s advertising and recruiting methods, as follows:

...the Commission has a significant historical record of complaints lodged against CEHE pertaining to its advertising and recruiting methods, so much so that it has become a familiar process of reviewing yet another allegation against CEHE. Given that history and the number of complaints received and reviewed by ACCSC over the years pertaining to CEHE’s

advertising and recruiting methods as well as the pending litigation that also relates to such matters, the Commission unequivocally expects that the CEHE and its affiliated schools will take better and special care to ensure that advertising and recruiting methods meet both the spirit and intent of ACCSC's accreditation requirements and do not create ambiguity, misrepresentations, or mislead students before or during the recruitment or enrollment processes. The Commission's tolerance has been worn and the next step will be to institute a system-wide action to monitor CEHE-affiliated schools and the advertising and recruiting methods used.

In context of the stated expectations regarding CEHE's advertising practices, the Commission considers the questions raised in the Team Summary Reports ("TSRs") at this juncture to be a serious matter. The Commission found that the responses to concerns cited across the system of schools show that CEHE has not yet taken responsibility to demonstrate compliance with accrediting standards. This finding serves to deepen the gravity of the matter as it raises the question about CEHE's ability or intent to manage the schools in compliance with accrediting standards and focused on student success.

CCSD (#M001073)

The February 16, 2018 TSR raised questions about the following phrases in advertising that CCSD was unable to substantiate through documentation:

- "IT jobs are booming with no sign of slowing down!"
- "Curriculum designed and taught by industry experts."
- "Your fast track to becoming a professional healthcare hero."
- On a flyer for programs at CCSD, the following statement is included: "Pursue a career in one of these high-demand fields: Graphic Arts through Independence University." It is unclear why the school is advertising IU-Salt Lake City alongside CCSD's programs.
- On another flyer for the IT program, it states "At California College San Diego, you can build that high-tech career base with a Bachelor's degree or prepare for managerial responsibility with a Master's degree." CCSD does not offer master's degrees.
- A newspaper ad states, "Train for a career in Medical Assisting." However, CCSD does not offer Medical Assisting. This newspaper ad also states, "Train for a career in Health info management" with a footnote in fine print indicating it is offered "fully online through our affiliated institution, Independence University."
- Another newspaper ad states, "Train for a career in Graphic Arts" with a footnote in fine print indicating it is "offered by our affiliated institution, IU-Salt Lake City."
- On most advertisements, there is a statement that CCSD's classes are offered days, evenings, and online with a footnote in fine print that indicates online courses are through IU-Salt Lake City.
- The school uses the phrase, "biggest RT program in the country." In review of this statement, the team found that the school is approved for the largest capacity of potential enrollments at 160 students. However, CCSD has never filled the program to capacity so this statement may be misleading.
- In all electronic advertising, the following address is displayed at the bottom of the screen: California College-San Diego Admissions, 4021 S. 700 East, Suite 400, Salt Lake City, UT

84107. This is not an accurate depiction of the school's address, and in fact, is the address of the affiliated school that provides distance education delivery, IU-Salt Lake City.

According to the school's response,

Unfortunately, the Team Summary Report does not provide any copies of the advertisements that are being questioned which further limits the college's ability to respond to the allegations or to present revised advertisements to address these concerns... the college does not agree that any of the issues cited above are in conflict with Section IV (B)(1) of the Standards. But without seeing the complete and actual advertisements that raised these concerns, the college cannot respond further and cannot provide revised advertisements.

As set forth in *Section III (K)(2) of the Rules of Process and Procedure, Standards of Accreditation*, schools are afforded an opportunity to respond to the Team Summary Report and to submit any information and documentation that the school may wish to place before the Commission in order to demonstrate compliance with accreditation standards. CCSD had the opportunity to provide a comprehensive set of advertising that would demonstrate current compliance with standards and chose instead to shift blame upon the on-site evaluation team and chose not to take the steps necessary to demonstrate compliance to the Commission (irrespective of whether the school(s) agreed with the team or not). Moreover, if the schools were truly lost and unable to understand the issue cited in the Team Summary Report, the report makes clear that the school can contact ACCSC staff for assistance with any questions.

In addition, the February 16, 2018 TSR raises questions about the following phrases that appear to emphasize employment over education (*Section IV (B)(2) Substantive Standards, Standards of Accreditation*),

- Designed for employment
- Turn your compassion into a rewarding career
- As a healthcare professional you'll enjoy the satisfaction that comes from a career helping others
- You could improve your salary and job security with a higher degree
- You've taken the first and most important step toward a better career, a bigger paycheck, and a more secure future
- Want a fulfilling career in a rewarding job field?
- Our career-focused degrees are designed for employment in some of today's very fulfilling jobs
- Still wondering how to start your real career?
- A degree is your best option for a better career, a bigger paycheck, and achieve your goals of a more rewarding life
- Prepare to launch your career
- Launch your new career TODAY
- Pursue a career in one of these high-demand fields

In response, CCSD stated:

Unfortunately, the Team Summary Report does not provide any copies of the advertisements that are being questioned which further limits the college's ability to respond to the allegations or to present revised advertisements to address these concerns. Notwithstanding the foregoing, the college will respond to the ridiculous allegation that these statements imply a guarantee of employment...

The school's response to each item consists of stating "[t]his contains no promise or guaranty... there is nothing in this statement that makes a promise or guaranty of employment... there is no promise or guarantee in this statement... this is obviously a question and not a promise or guaranty of employment... no promise or guaranty in this statement." The Commission was not persuaded by these assertions. The Commission found that the phrases in question do focus on employment/careers and in particular, the enhancement of earning potential and other benefits that will accrue as a result of employment/career. While the Commission agrees that the statements may not necessarily "guarantee" employment, the statements do appear to focus on employment rather than education, which the Commission found can be construed as misleading particularly given the school's lack of demonstrated successful student achievement. The response does not address *Section IV (B)(2) Substantive Standards, Standards of Accreditation* which states "[a]ll advertising and promotional materials **clearly** indicate that education, and not employment, is being offered."

CA-Flagstaff (#M070742)

The February 16, 2018 TSR raises questions regarding advertising programs that are not offered at the school. In response, CA-Flagstaff stated,

Advertising brochures are often created for the entire CollegeAmerica group of schools which includes the CollegeAmerica campuses in Colorado and Phoenix, AZ. Within that group of schools, campuses offer different programs depending on location. Within the group of schools, all programs listed were available."

The school provided a scanned image of a direct mail postcard, showing a list of programs offered, with a disclaimer that not all programs are offered at all campuses. The mailing piece indicates that prospective students must contact the school for a list of programs that are available. The Commission is not convinced, given the concerns articulated to CEHE on more than one occasion regarding misleading advertising, that the tactic of providing a slate of all programs offered within a geographic area and requiring a telephone call to find out if the program is available fulfills each school's obligation to provide prospective students with accurate information regarding available programs. The Commission is concerned that this form of advertising may create an opportunity for a CEHE recruiter to apply undue pressure to enroll in a program other than that in which the prospective student has expressed an original interest. In addition, the Commission noted, the TSR cites the school's website advertising; however, the response does not address how programmatic offerings are represented on the school's website.

SHC-Idaho Falls (#B072351)

The February 16, 2018 TSR raises questions regarding advertising programs that are not offered at the school. In response, SHC-Idaho Falls, stated the following:

Some of the printed advertisements for the Idaho Falls campus are part of larger ad campaigns that include information for all of the Stevens-Henager College locations. All of the advertisements that include multiple locations have clear language and identifiers that programs vary by campus. Like our catalog, all locations are represented and there is clear

information within the advertisement to indicate which programs are offered at which campus. This is the case for the nursing and Master’s degree programs which are offered at other Stevens-Henager locations.

The Computer Science BS (information technology) program was offered at the Idaho Falls campus up until 8/16/2016. The direct mail piece questioned by the visit Team was inadvertently sent out to previous responders in the Idaho Falls area. This was an error by CEHE’s Marketing department. A Data Letter published by CEHE’s Compliance Department, lists which programs are approved at each campus. This Data Letter is now updated each time there is a change to any campus programs and the Data Letter is distributed to all Campus Directors, all Advertising personnel, and all Senior Executives by CEHE’s CEO.

The response includes a copy of the 10-page Data Letter used to inform CEHE’s own employees of the programs offered at each location; however, the Commission found that the schools have not shown how prospective students are informed of what programs are offered at which locations.

SHC-Logan (#B070584)

The February 16, 2018 TSR raises a question with regard to an advertisement claiming that certain careers were in high demand. The advertisement includes a disclosure stating the information came from the Bureau of Labor Statistics and U.S. News websites. However, the websites provided do not support the rapid growth of the career fields mentioned in the advertisement or the jobs for which the school’s programs prepares students. In response, the school stated,

The advertisement claiming that that certain careers were in high demand was an advertisement that the College had been using for more than 12 months. During that time, the reference, a study published in the U.S. News, was updated and the numbers changed. The marketing department has implemented a new policy that requires a review of each reference each time the ad is run to ensure that the data from the reference site has not changed.

Although the response refers to a new practice to help ensure that advertising is accurate, the school did not include current advertising to show that the school has achieved compliance with accrediting standards in this regard.

In addition, the February 16, 2018 TSR raised questions regarding a corporate admissions script containing the phrase “most of our students increase their income” and the school did not produce documentation to support the accuracy of this claim. In response, SHC-Logan stated,

The college notes that this item and issue was not discussed or brought up during the visit Team’s exit meeting with the campus leadership.³ The campus has no idea what the Team is referring to in this finding and therefore cannot comment directly or provide supporting documentation to evidence compliance with the Standards. We have reviewed the Team Summary Report and we cannot find any example or documentation to respond to.

The Commission found that the TSR reasonably described the questioned material as a “corporate admissions script,” and the phrase in question as “most of our students increase their income.” More importantly, the Commission found this response to contribute to the picture of CEHE schools as unable or unwilling to accept the responsibility to engage in self-assessment, relying instead on Commission action. SCH-Logan had the opportunity to simply provide the admissions scripts used by

³ As is read at the beginning of the Exit Interview Preface, nothing stated in the exit interview is final nor should the school rely on statements made in the exit interview. The on-site evaluation report is the final expression of the team’s findings.

the school to demonstrate current compliance. Instead chose to take the stance of “having no idea” as a reason to not respond sufficiently.

Due to the ongoing nature of questioned advertising practices, it is of paramount importance that CEHE demonstrate that the system of ACCSC-accredited schools is capable of advertising in a manner that complies with accrediting standards on an ongoing basis. Therefore, in addition to scrutinizing the content of all advertising and promotional materials for CEHE-affiliated schools, the Commission intends to examine the processes that go into the creation and approval of advertising, as well as the oversight mechanisms used to ensure compliance to ascertain the likelihood that CEHE has the ability to comply with accrediting standards in this area due to the schools’ own efforts, rather than as a result of Commission action.

Accordingly, the Commission directs CEHE to submit the following:

- a. An explanation of the locus of responsibility for the content of the schools’ advertising and promotional materials and any oversight mechanisms in place to ensure that advertising and promotional materials comply with accrediting standards;
 - b. A description of how CEHE ensures that advertising is designed to attract students who are qualified and likely to complete and benefit from the education and training provided by the school and not simply to obtain enrollments;
 - c. A description of the school’s mechanisms to safeguard prospective students from forming misleading or exaggerated impressions with regard to the school; and
 - d. Copies of all advertising and promotional materials in current use by each CEHE-affiliated school, including - but not limited to - Internet advertising, the URL for the school’s websites, radio or television (scripts are acceptable), flyers, direct mail, surveys, newsprint, and Yellow Pages.
3. CEHE did not demonstrate that the schools avoid using scholarships and tuition discounts as inducements to enroll (*Section I (D)(2), Substantive Standards, Standards of Accreditation*). The Commission’s review of how CEHE-accredited schools use scholarships in advertising has been an ongoing matter. In 2012, a series of anonymous complaints filed with the Commission raised questions with regard to the advertising and awarding of scholarships. As set forth in the System-Wide Show Cause Order dated July 12, 2013, the Commission specifically questioned whether CEHE’s scholarship awards represent bona fide grants-in-aid, whether CEHE issues scholarships for recognized and acceptable purposes that include specified criteria, and whether advertising accurately represents the amount of scholarship funding available. At the May 2015 meeting, the Commission reviewed CEHE’s system-wide Advertising Report and found that advertising of scholarships appear to imply eligibility prior to determining the recipient meets all admissions requirements and that advertising for scholarships does not, in all instances, include an eligibility phrase. At the February 2016 meeting, the Commission noted that CEHE appeared to have changed and/or removed advertising that did not comply with accrediting standards; however, given the history of this matter, the Commission determined that ongoing monitoring of this areas was warranted. By letter dated January 26, 2017, the Commission noted the following with regard to the review of the Advertising Report at the November 2016 meeting:

With regard to the Advertising Report, CEHE submitted copies of advertising materials developed as a result of the schools’ compliance analysis along with CEHE’s advertising

material review and approval process. The Commission noted that CEHE appears to have changed and/or removed advertising that the Commission had questioned in recent past. However, given the history of this matter, as well [sic] the open status of the aforementioned legal matters, the Commission determined that additional monitoring is warranted.

The results of the current review show that despite the Commission's ongoing efforts to monitor and support compliance in this area, CEHE-affiliated schools have been unable or unwilling to make lasting changes to policies and practices to demonstrate ongoing compliance with accrediting standards. In reviewing the current record, the Commission found that advertising emphasizes the plentiful availability of scholarships from the schools and the ease of receiving such funds to such an extent that it calls into question whether this practice can be considered a financial inducement to enroll.

CCSD (#M001073)

The February 16, 2018 TSR raised questions regarding a direct mailer that includes a preliminary scholarship application linking the recipient to a personal webpage to complete a scholarship application. The mailer and the personal webpage do not disclose any information regarding the programs currently offered by the school. From this, it would appear that CEHE is advertising the availability of scholarships, rather than education. In addition, CCSD awards \$3,000 to students who complete GEDs through CEHE's program and subsequently enroll in degree program at any CEHE school. Similarly, CCSD awards students \$5,000 who complete an associate's degree and subsequently enroll in a bachelor's degree at the school. In response, CEHE stated:

The college disagrees with this finding. First of all, the college does not "award money" to students that matriculate into another program. Both of these programs are tuition discounts or scholarships that are available to students. There is no money that changes hands with these awards. Virtually every college in America offers a discount program for alumni who want to pursue additional education or training with a college. These two programs are no different. We are simply offering a discount to alumni that complete the colleges GED prep program and alumni that have already completed one of the colleges associate degree programs. These are alumni benefit programs and not inducements to enroll. These programs are offered to all eligible alumni and since they are available to EVERY SINGLE alumni, they are not an inducement to enroll.

The Commission was not persuaded by the CEHE's argument that scholarships and tuition discounts are not the same as awarding "money." The promise of a reduction in financial obligation creates a perceived financial incentive. The Commission recognizes that scholarships are widely used by postsecondary institutions to support the pursuit of education; however, the Commission questions the inordinate focus of CEHE's advertising on the availability of scholarships, to the exclusion of other attributes of the school – including education, which is the stated as the schools' primary focus in its mission statement.

In addition, the February 16, 2018 TSR raised questions about whether advertising of scholarships includes an eligibility phrase that clearly communicates scholarships are available for those who qualify. In response, the school stated:

The size of the print and the location of the eligibility phrase is irrelevant to compliance with the Standards. All of the advertisements that mention scholarships include the eligibility

phrase and the Team has not presented a single advertisements [sic] that does not have the required eligibility phrase.

The Commission disagrees with the statement that the print and location of the eligibility phrase are irrelevant. It is possible that the design and presentation of the advertising may render the eligibility phrase completely ineffective in communicating the required disclosure. In response to similar findings at other schools, CEHE responded as follows:

The advertisement in question was an envelope that was a part of a direct mail piece that included an envelope and several documents inside. The documents included a letter and brochure. Both the letter and brochure had all the required disclaimers regarding scholarships. Since the packet was meant to be viewed as a whole, it was thought that the envelope would not be evaluated by itself and therefore a disclaimer on the envelope was not necessary. When the visiting team brought this to the college's attention, the marketing department was notified and a change was made to ensure that even the envelope would include the disclaimer if scholarships were mentioned. Attached is a sample envelope of the current direct mail.

The sample envelope states that “SCHOLARSHIP FUNDS ARE AVAILABLE*”; however, the asterisked text is printed upside down in a much smaller font size. It is not clear that when the envelope is folded, the asterisked text appears on the same side of the envelope with the availability statement. The Commission found that this presentation does not meet the requirement to make prospective students aware that there are qualifications to receiving scholarship funds.

CA-Flagstaff (#M070742)

The February 16, 2018 TSR indicates that of the 73 current students at the time of the on-site evaluation, 52 (71%) received institutionally-funded financial awards, of which 42 have received a scholarship and 10 received a CEHE family grant. CA-Flagstaff's response does not provide further information regarding the extent to which the school funds scholarships to reduce the cost of tuition. The Commission is interested in reviewing the schools' practices regarding tuition discounting as well as the nature and extent of institutionally-funded scholarships and grants – and the source and allocation of such money – for each school in the CEHE system.

Based on the foregoing, it is not clear that CEHE's practices around the scholarships and tuition discounts comply with accrediting standards. CEHE's ongoing disregard for clarity in advertising and issues like the “size and location of disclaimers” troubles the Commission as it establishes a tone that CEHE does not place sufficient emphasis on ensuring that advertising accurately represents the school and avoids misleading impressions. Accordingly, the Commission directs the school to submit the following:

- a. An explanation as to whether there is one set of policies and procedures regarding scholarships and tuition discounts designed to be implemented at all CEHE schools, or if each campus is responsible for designing and implementing scholarships and tuition discounts;
- b. An explanation as to how scholarships and/or tuition discounts are designed, advertised, and awarded in a manner that supports the successful achievement of students, rather than serving as an inducement to enroll;

- c. A description of the locus of responsibility for the scholarship and tuition discount programs, including developing criteria, reviewing applications, and managing funds;
 - d. A list of the scholarship programs and tuition discount programs offered at each CEHE-affiliated school. The list must identify which programs are scholarships and which programs are tuition discounts;
 - e. The eligibility criteria for each scholarship and tuition discount listed above and a description of the type of documentation collected to demonstrate that each recipient met the eligibility criteria; and
 - f. A list of current students at each CEHE-affiliated institution and the type and amount of monetary award received by each.
4. CEHE did not demonstrate successful student achievement, including acceptable rates of student graduation and graduate employment (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*), at each of the schools, as follows below.

CCSD (School M001073)

The Commission noted the following with regard to the scope of the student achievement issues at CCSD. The school is currently approved to offer 11 programs, of which 9 have been operational long enough to be reportable via the Graduation and Employment Chart formula, including 7 that are delivered 100% at the satellite location and therefore reported separately. Of those programs, the school is reporting below-benchmark student achievement for 50% (8 of 16) of the reportable programs. Below is a summary of the performance of the individual programs:

CCSD (#M001073)					
Report Date July 2017					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Computer Programming (AAS) – Main School	20	36%	43%	33%	70%
Computer Technology & Networking (AAS) – Main School	20	37%	43%	70%	70%
Respiratory Therapy (AS) – Main school	20	45%	43%	47%	70%
Business Administration (BS) – Main School	36	41%	40%	67%	70%
Healthcare Administration (BS) – Main School	36	62%	40%	29%	70%
Respiratory Therapy (BS) – Main School	36	68%	40%	33%	70%
Computer Programming (AAS) – Satellite Location	20	0%	43%	0%	70%
Healthcare Administration (BS) – Satellite Location	36	33%	40%	100%	70%

Business Administration

With regard to the Business Administration (BS) program at the CCSD main school, the below-benchmark employment rate was reported with the 2017 Annual Report and CCSD has not yet had an opportunity to provide additional information. Therefore, the Commission will direct the school to provide updated student achievement rates for this program.

Computer Programming (AAS)

In addition to the below-benchmark rates reported for the Computer Programming (AAS) program shown above, the Commission noted the history of poor student achievement rates for this program as follows:

Computer Programming (AAS) Main School			Computer Programming (AAS) Satellite Location		
Annual Report	Graduation	Employment	Annual Report	Graduation	Employment
2017	36%	33%	2017	0%	0%
2016	0%	0%	2016	No Report	
2015	0%	0%	2014	N/A	N/A

According to the school’s response, “[t]he College believes that the small cohort was a major factor in keeping the program from reaching the graduation benchmark. The College limited enrollment in this program between 2011-2013 due to a lack of qualified faculty. This cohort reported was small since it included a portion of the time the College limited enrollments.” The Commission noted that there were a total of 22 starts reported in the 2015, 2016, and 2017 Annual Reports, of which 4 graduated, and 1 was employed in field. Despite the number of enrollments, the Commission found that a graduation rate of 18% over three years does not show the program’s success. Moreover, the Commission was not persuaded by the school’s claim that lower enrollment was to blame for poor program performance when the lack of qualified faculty drove school’s strategic initiative to limit enrollment in the first place.

CCSD indicated that the school has created a new position, the Dean of Teaching and Learning Excellence, to focus on training and professional development for instructors. The new Dean has “focused on faculty training, new faculty orientation, faculty observations and evaluations, faculty report cards, and coaching for improvements of faculty.” The school’s response posits that this strategy appears to have been effective, as the “campus graduation rate” for this program for the “2018 cohort” is 65%, which exceeds ACCSC’s benchmark of 43% for programs of comparable length. The school also attributed the low employment rate to the small cohort size and the response indicates that the school has been focusing on third-party certifications to make graduates more competitive in the marketplace. The school reported that for 2017 year-to-date, 104 students passed certifications, compared to just 6 who passed the year before. The school anticipates an employment rate of 80% for the 2018 cohort, based on 4 employed graduates of 5 graduates available for employment.

Computer Technology & Networking (AAS) program

In addition to the below-benchmark rates reported for the Computer Technology (AAS) program, the Commission noted the history of below-benchmark student achievement rates for this program as follows:

Computer Technology & Networking (AAS) - Main School		
Annual Report	Graduation	Employment
2017	37%	70%
2016	55%	64%
2015	39%	71%

Computer Technology & Networking (AAS) - Satellite Location		
Annual Report	Graduation	Employment
2017	54%	71%
2016	27%	75%
2015	25%	100%

According to CCSD’s response, “...the College has made the decision to no longer enroll in the Computer Technology and Networking program at the main campus and to concentrate all of its efforts on making the AAS Computer Technology & Networking program successful at the satellite campus.” The response does not provide any information with regard to how long students will continue to be enrolled in the Computer Technology & Networking program at the main school, therefore the Commission intends to obtain additional information in order monitor the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out at the main school. In addition, in noting the history of below-benchmark graduation rates at the satellite location, the Commission is interested in monitoring this program to ensure that the strategies implemented to improve graduation rates continue to be effective.

In addition to the below-benchmark rates reported for the Healthcare Administration (BS) program, the Commission noted the history of below-benchmark student achievement rates for this program as follows:

Healthcare Administration (BS) - Main School		
Annual Report	Graduation	Employment
2017	37%	70%
2016	55%	64%
2015	39%	71%

Healthcare Administration (BS) - Satellite Location		
Annual Report	Graduation	Employment
2017	54%	71%
2016	27%	75%
2015	25%	100%

According to the school’s response, the Healthcare Administration (BS) program is in teach-out. The Commission confirmed that the school has filed a Programmatic Teach-Out Approval Form as required, and the last students are scheduled to graduate in July 2019. Therefore, the Commission will continue to monitor the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

Respiratory Therapy (AS)

In addition to the below-benchmark rates reported for the Respiratory Therapy (AS) program, the Commission noted the history of below-benchmark student achievement rates for this program as follows:

Respiratory Therapy (AS) - Main School		
Annual Report	Graduation	Employment
2017	45%	47%
2016	52%	56%
2015	68%	70%

According to CCSD’s response, “[t]he factors that kept the AS Respiratory Therapy (ASRT) program from making bench[mark] were graduates that had not passed the national board exams and state licensing requirements in order to be eligible to work.” The school explained that the recent changes to the California state requirements for employment, as well as the lengthy process and high cost of national board exams and California state licensing, are factors impacting the program’s employment rate. CCSD indicated that the school has implemented the following strategies to improve the employment rates in the Respiratory Therapy (AS) program: tutoring reviews for national board exams; paying for the exam fees; a six-week review program for national board exams and state licensure; encouraging graduates to seek opportunities outside the state of California; and enhanced contact with graduates. The school indicated that of 37 graduates in 2017 year-to-date 22 are licensed and employed as Respiratory Therapists, as an indicator that the strategies have been effective. The Commission is interested in reviewing student achievement data reported via the Graduation and Employment Chart formula to ensure that the employment rates are now above-benchmark.

Respiratory Therapy (BS)

In addition to the below-benchmark rates reported for the Respiratory Therapy (BS) program, the Commission noted the history of below-benchmark student achievement rates for this program as follows:

Respiratory Therapy (BS) – Main School		
Annual Report	Graduation	Employment
2017	68%	33%
2016	62%	56%
2015	55%	77%

In response, the school stated that:

To be employed in field as a respiratory therapist, the Bachelor of Science in Respiratory Therapy (BSRT) degree program requires the same national board exams and state licensing requirements, as the associates degree described above. The students in this bachelors’ cohort were active in the program between 10/2011 – 9/2012; this was before the College required students to complete their associate degree as an entrance requirement for the bachelors. Many of these BSRT graduates went straight into the bachelor’s degree from the associate degree before taking the national board exams, this could ultimately delay the graduate taking the exam for two years from their eligibility date. The College made a change to the requirements of the BSRT program in 2014, now an Associate’s degree from a CoARC approved college is required for entrance to the BS degree program. This policy change will solve the problem of graduates not having the necessary credentials and licensing to work in the field of respiratory therapy.

From the school’s explanation, it is not clear if applicants for admissions to the Respiratory Therapy (BS) program are required to have completed an associate’s degree only or if they are also required to have passed the national board exams and obtained state licensure. Therefore, the Commission is interested in additional information regarding the employment opportunities for graduates of the baccalaureate degree program, and how the school supports students in achieving those employment outcomes.

IU-Salt Lake City (#B072309)

The Commission noted the following with regard to the scope of the student achievement issues at IU-Salt Lake City:

- The school is currently approved to offer 20 programs, of which 13 have been operational long enough to be reportable via the Graduation and Employment Chart formula. Of those programs, the school reported below-benchmark student achievement outcomes for 61% (8 of 13) as outlined in the table below.
- The programs with the highest enrollments are below benchmark; thereby affecting the largest number of students.
- The Commission reviewed the Program Enrollment Summaries that IU-Salt Lake City provided to ACCSC on Annual Reports for the seven programs that have not been operational long enough to have reportable student achievement data. The number of graduations and withdrawal/terminations reported are indicative of below-benchmark rates of student graduation.
- In addition to being unable to demonstrate current compliance with student achievement standards in 61% of the active, reportable programs, the Commission noted the following history of poor student achievement rates:
 - The school has reported below-benchmark student achievement rates for the entire reporting history of the Business Management and Accounting (AAS), Graphic Arts (AAS), and Medical Specialties (AOS) programs.
 - Healthcare Administration-DE (MS) and Master of Business Administration-DE (MBA) programs have reported below-benchmark rates on the two most recent Annual Reports.
 - The Respiratory Therapy-DE (AS) program has reported below-benchmark rates of employment for four of the last five reporting years.

IU-Salt Lake City (#B072309)					
Report Date January 2018					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Business Management and Accounting – DE (AAS)	20	17%	43%	47%	70%
Graphic Arts – DE (AAS)	20	19%	43%	23%	70%
Healthcare Administration – DE (MS)	15	76%	50%	52%	70%
Information Systems – DE (MS)	15	45%	50%	44%	70%
Master of Business Administration - DE (MS)	15	56%	50%	45%	70%
Medical Specialties – DE (AOS)	22	17%	43%	27%	70%
Public Health – DE (MPH)	16	72%	50%	50%	70%
Respiratory Therapy – DE (AS)	26	54%	40%	51%	70%

As directed, for each program for which the reported rates of student graduation and graduate employment do not meet the ACCSC benchmark, the school provided an updated assessment of the factors impacting the rates of student graduation (e.g., admissions requirements and student support) and graduate employment (e.g., economic conditions), how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies.

According to the school's response, the "factors impacting the graduation rate" are in the areas of: life issues, course scheduling, time management, technology issues, and student engagement. IU-Salt Lake City described its strategies to improve student achievement as follows:

- The school is in the process of creating diploma programs for students who experience intervening "life events" that prevent them from completing a degree.
- The school is contemplating moving to scheduling students for a single five-credit course per four-week module. (According to the response, the issue around course scheduling is that students must be enrolled in two courses in a four-week module. The response does not make clear why this constitutes a problem and the school did not explain how this course schedule is preventing student achievement. Therefore, it is unclear how the new scheduling approach will be more successful.)
- The school found that students who earn a C grade in the first course subsequently dropped in their first year of study. To address this situation, the school has implemented "the School Café," an augmented support system for the students who earn a C grade in the first course.
- The school now provides tablets to students before they begin the program and provides laptops to students who make it through the first three modules. (The school indicated it had discovered that its assessment of students' technology resources was not an accurate predictor of whether those students have access to adequate technology.)
- The school hired a new person dedicated to providing loaners and making repairs as a means to address the delayed turnaround time to assist students experience hardware problems.
- The school has created an IT Support Help Desk for students with six full-time staff and two interns (the interns had been doing both tutoring and support but were relieved from tutoring responsibilities so that they could focus exclusively on IT support help).
- The school has created Faculty Program Advisors (FPAs) in order to address the need for more effective student engagement. These advisors are qualified faculty members who are assigned to serve as the primary academic point of contact for a specific population of between 60 and 130 active students. FPAs reach out to new students in the first module of instruction and work with the student to reaffirm their commitment to education and academic progress.
- The school launched a weekly communication to all active students titled "IU Student News" in order to keep students informed and increase their level of engagement.
- The school has instituted a series of regional open houses for active students and graduates to "bring the campus to the students." So far, five open houses have been held in Charlotte, North Carolina; Macon, Georgia; Kissimmee, Florida; Houston, Texas; and Arlington, Texas. Ten additional events are scheduled for 2018/2019.
- The school is launching a new software system that accesses the information from the school's computer systems and "will provide significant efficiencies and near real time data on student progress, at-risk factors, compiled communications, interaction tracking, and alerts. (The school

identified a need for better tracking, communicating, and coordinating its efforts with students, and especially at-risk students.). The software also includes predictive analytics, segmentation of at-risk students, custom cohorts, SMS text messaging, and an interactive calendaring system.”

- The school reorganized the student services department. Students are paired with individual Student Advisors in addition to the Faculty Program Advisors. The student advisory team has been doubled to 44 members. (The response does not explain how many students are assigned to each advisor.)
- The school plans to revise the Business Management and Accounting-DE program as it has too many courses in accounting. (The Commission noted that this program has low graduation and employment rates. While it may be true that there are too many accounting courses, the response does not explain how this strategy is designed to improve graduation and/or employment rates.)
- The school has implemented a portfolio preparation process with the Faculty Program Advisor to prepare students for the completion of the capstone course for the Graphic Design program. In addition, students are provided with individual websites for use in posting portfolio work.
- The school switched to a new simulation software and began testing a certification program for the Medical Specialties programs. In addition, the school has invested in a full production of the learning objectives in a multimedia format.
- The school made a change to the advisor for the Information Systems-DE (MS) program the small numbers of enrollments in the program poses a challenge to student success. (The response does not explain why low enrollment poses a challenge to student success nor how this change will help overcome such challenge.)

According to the school’s response, the “factors impacting the employment rate” are in the areas of: staffing size and structure, early engagement of career services, responsiveness of students, accurate documentation, graduate expectations and levels of preparedness, and development of employment opportunities. IU-Salt Lake City described its strategies to improve student achievement as follows:

- The school promoted a new director of career services in April 2017, reorganized the structure of the department, and hired additional career services representatives.
- The school reported having 22 Career Services Advisors and three assistant directors of Career Services, with plans to add an additional 10 advisors in the second and third quarters of 2018.
- The school implemented early engagement of career services advisors with students. Beginning in January 2018, the school indicated that each student in the first module of a program is assigned a designated Career Services Advisor.
- The school expanded its communication efforts to include text and e-mail, rather than relying solely on telephone calls.
- The school focuses on professional development of students in terms of soft skills, resume creation, job search and interview skills.
- The school has implemented a multi-level internal review process to ensure the accuracy of documentation.

IU-Salt Lake City’s assessment of the effectiveness of the school’s strategies to improve both graduation rates and employment rates is that there has been a positive effect on employment rates. The Commission, however, found little empirical evidence to support this assessment and given the

low rates reported by the school it is unclear as to whether the improvements will result in graduation and employment rates that minimally meet ACCSC student achievement benchmark rates.

In addition, IU-Salt Lake City did not demonstrate successful student achievement by maintaining acceptable pass rates on licensure/certification exams where required by government entities to work in a particular career field. As noted in the TSR, with the 2016 Annual Report, the school reported that licensure is required for employment in the Respiratory Therapy (AS) program. The school, however, did not provide licensure information for this program. In response, the school acknowledged the oversight and provided screen shots of Graduation and Employment Charts with completed pass rate information for the Respiratory Therapy (AS) program for the 2016 and 2017 Annual Report. Upon review of the information submitted, the Commission found the following

- On the 2017 Annual Report, the school reported a 58% pass rate on licensure/certification exams for the Respiratory Therapy (AS) program, which falls below ACCSC’s minimum benchmark of 70%.
- On the 2017 Annual Report, the school reported that licensure/certification is required by government entities to work in the Respiratory Therapy (AS) field and responded that licensure/certification is not required to work in the Respiratory Care (BS) field. It is not clear why licensure is required for employment of the graduates of the associate’s degree and not for graduates of the baccalaureate degree.
- On the 2017 Annual Report, the school reported that licensure is not required to work in the field for the Nursing-DE program. The Commission is interested in documentation confirming the accuracy of that report, as it appears to be common practice for licensure to be required in order to be employed in the field of nursing.

CA-Flagstaff (#M070742)

The Commission noted the following with regard to the scope of the student achievement issues at CA-Flagstaff. With the 2017 Annual Report and the response to the TSR, CA-Flagstaff reported below-benchmark rates of student achievement for four of the school’s five approved programs, as outlined in the table below.

CA-Flagstaff (#M070742)					
Report Date January 2018					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Medical Specialties (AOS)	20	46%	43%	71%	70%
Business Management and Accounting (AAS)	20	33%	43%	75%	70%
Computer Technology & Networking (AAS) *	20	39%	43%	50%	70%
Computer Science (BS)	36	67%	40%	0%	70%
Healthcare Administration (BS)	36	23%	40%	50%	70%

* Graduation and Employment data drawn from the 2017 Annual Report.

Business Management and Accounting (AAS)

With regard to the Business Management and Accounting (AAS) program, the Commission noted the following history of below-benchmark student achievement rates:

Business Management and Accounting (AAS)		
Report Date	Graduation	Employment
January 2018	33%	75%
July 2017	20%	100%
July 2016	32%	100%

According to the school’s response,

The Flagstaff campus serves a unique demographic and unique geographic market that the Commission must take into consideration when evaluating and understanding the colleges’ outcomes. The Flagstaff campus of CollegeAmerica serves a geographic area that covers almost one-quarter of the state of Arizona. This is primarily the result of the Indian American reservation footprint and distribution. Due to this massive geographic area, student travel time to the campus can be from 45 minutes to 3 hours – ONE WAY.

CollegeAmerica Flagstaff’s student populations are unique. The population is 65% Native American, 25% White, 5% Hispanic, and 5% African American. Almost two-thirds of our students are Native American. Due to this population mix, CollegeAmerica Flagstaff is faced with several unique and challenging cultural factors that must be considered and/or addressed when serving this population.

- Lack of direct eye contact is a sign of respect in American Indian culture. This hinders students from engaging in class with instructors.*
- American Indians [sic] culture teaches that people should not speak out or speak up unless absolutely necessary. This makes student engagement in course content difficult.*
- American Indian culture shuns individual recognition. The culture teaches that it is the group that is to be recognized. Praise is accepted, but it must be in a one on one situation.*
- American Indian culture focuses upon “living in the present as each day comes.” This has a significant impact upon goal-setting and future planning.*
- American Indian culture teaches that time is flowing – and the flow will always be there. Clocks are not watched. Schedules are fluid and not valued. This makes deadlines and schedules difficult for our students to understand and appreciate.*
- Religious times & celebrations are extremely valued, highly important, and lengthy in duration. Example: Family funeral observances can take up to one week; Students cannot come to class if there has been a family death. During seasonal changes, they celebrate for a couple of weeks at a time. It is common during Spring Equinox or Winter Solstice for a student to miss classes due to scheduled ceremonies. There are cultural rituals of many types for many life happenings the campus must adapt to respect the culture of the students.*

The Commission found that a series of over-generalized statements regarding “American Indians” and “American Indian Culture” shows a profound lack of sensitivity to the students the school serves.

That the school labels the cultural values of its students as “challenges to be addressed,” contributes to the impression of a lack of respect for its students’ closely-held cultural values and that the school is ill-equipped to meet the needs of its students. The Commission was astounded to see the school generalize cultural characteristics of its students and to then blame the school’s poor performance indicators on those characteristics and the students. The school’s response essentially posits that American Indians cannot be as successful as other students due to their culture, which the Commission found to be in no way acceptable as a mitigating factor for the school’s low graduation rates.

Moreover, although CA-Flagstaff stated that the school must “address” the factors listed above, the school’s response appears to only describe strategies to address factors such as academics, admissions process, geographic obstacles, online courses, campus-to-student communication, and small cohorts as demonstrated by the strategies listed below drawn from the school’s response.

- Establishing internship opportunities and professional mentors;
- A multi-departmental retention team that meets monthly to review at-risk students and take pre-emptive actions;
- A “Missing in Action” email report of students that have been missing 5 or more days;
- Instructors provide a “Monitor List” of potential at-risk students;
- Instructors establish more consistent office hours;
- The Student Services Advisor position was expanded from part-time to full-time;
- Facilitating the re-enrollment of previously dropped students;
- Improved faculty interaction with students taking a fully online course through IU-Salt Lake City;
- All staff and faculty members are available to students via Google text;
- More efficient scheduling to reduce the number of online courses students have to take;
- Enhanced communication among faculty and staff, including weekly staff meetings, the creation of specialized “campaign teams in areas such as Student Satisfaction, Retention, Internal Customer Service, Alumni, and Outreach; and
- To increase the size of cohorts and expand student engagement, the campus has moved from monthly to quarterly starts.

Although the school’s response indicates that these strategies appear to be having some positive impacts on student achievement rates, the Commission noted the persistence of low graduation rates over the last three years and is concerned that the school may not be adequately supporting the needs of its specific student population.

Computer Science (BS)

With regard to the Computer Science (BS) program, the Commission noted the following history of below-benchmark student achievement rates:

Computer Science (BS)		
Report Date	Graduation	Employment
January 2018	67%	0%
July 2017	40%	33%

July 2016	0%	N/A
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According to the school’s response, “[s]ince the primary factor impacting graduation rate was small enrollment, the college decided to cease enrolling new students into this program and teach it out.” The Commission confirmed that the school has filed a Programmatic Teach-Out Plan Approval Form as required and the last students are scheduled to graduate in October 2020. Therefore, the Commission will continue to monitor the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

Computer Technology & Networking (AAS)

The below-benchmark graduation and employment rate for the Computer Technology & Networking (AAS) program was reported with the 2017 Annual Report and CA Flagstaff has not yet had an opportunity to provide additional information. Therefore, the Commission will afford the school such opportunity in response to this letter.

Healthcare Administration (BS)

With regard to the Healthcare Administration (BS) program, the program is in teach-out and the last student is scheduled to graduate in September 2019. The Commission is interested in following up with the status of the teach-out and the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

SHC-Idaho Falls (#B072351)

The Commission noted the following with regard to the scope of the student achievement issues at SHC- Idaho Falls. With the 2017 Annual Report and the response to the TSR, SHC- Idaho Falls reported below-benchmark rates of student achievement for five of the school’s six approved programs, as outlined in the table below.

SHC-Idaho Falls (#B072351)					
Report Date January 2018					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Accounting (BS)	36	60%	40%	33%	70%
Business Administration (BS)	36	8%	40%	100%	70%
Business Management and Accounting (AAS)	20	29%	43%	50%	70%
Computer Science (BS)* †	36	17%	40%	100%	70%
Healthcare Administration (BS)	36	36%		25%	70%
Medical Specialties (AOS)*	20	44%	43%	72%	70%

* Graduation and Employment data drawn from the 2017 Annual Report.

† This program is in teach-out.

Accounting (BS)

The Accounting (BS) program had been operational long enough to be reportable via the Graduation and Employment Chart formula for the first time with the 2017 Annual Report. In this report, the school reported a below-benchmark graduation rate of 0%. The school provided an updated Graduation and Employment Chart, prepared using a Report Date of January 2018, to supplement the Annual Report submission. With that Graduation and Employment Chart, the school reported an above-benchmark graduation rate of 60%; however, the reported employment rate is below benchmark at 33%.

The school’s response indicates that graduates are electing to continue employment in positions that cannot be classified as in-field positions. To counteract this issue, the school has decided to “set employment expectations earlier in the student lifecycle.” Prospective students are asked more career-oriented questions during the admissions interview process, and the career services course has been moved up – from the end of the students’ program, to the first 6-8 months. In addition, the school has undertaken an initiative to assist underemployed graduates to obtain a promotion or advancement in the field. It appears that the new strategies have not yet been in place long enough to show definitive success. The Commission questions, however, whether it is the performance of the school and the Accounting program curriculum/instruction that is leading graduates to out-of-field employment.

Business Administration (BS)

The Commission noted that the Business Administration (BS) program had been operational long enough to be reportable via the Graduation and Employment Chart formula for the first time with the 2017 Annual Report, and the school reported a below-benchmark graduation rate of 33%. The school provided an updated Graduation and Employment Chart, prepared using a Report Date of January 2018, to supplement the Annual Report submission. With that Graduation and Employment Chart, the school reported a graduation rate of 8%, which represents a significant decline in the graduation rate.

Business Management and Accounting (AAS)

With regard to the Business Management and Accounting (AAS) program, the Commission noted the following history of below-benchmark student achievement rates since the program first became reportable via ACCSC’s Graduation and Employment Chart formula:

Business Management and Accounting (AAS)		
Report Date	Graduation	Employment
January 2018	29%	50%
July 2017	33%	100%
July 2016	33%	100%
July 2015	50%	100%

According to the school’s response, the factors impacting the graduation rates are small cohorts and students’ personal issues. To address the need for more one-on-one interaction, each staff member has been assigned specific students to mentor. In addition, the school has hired an on-campus accounting tutor and promoted the Director of Student Services into the Associate Dean of Business position, to provide more focused oversight. The school’s initial assessment indicates that these measures will be effective in improving the graduation rate.

With regard to the factors impacting employment rates, the school again cited small cohort size and personal issues; however, the school also reported that graduates are electing to continue employment in positions that cannot be classified as in-field positions. To counteract this issue, the school has decided to “set employment expectations earlier in the student lifecycle.” Prospective students are asked more career-oriented questions during the admissions interview process, and the career services course has been moved up – from the end of the students’ program, to the first 6-8 months. It appears that the new strategies have not yet been in place long enough to show definitive success.

Computer Science (BS)

The Commission noted that the Computer Science (BS) program had been operational long enough to be reportable via the Graduation and Employment Chart formula for the first time with the 2017 Annual Report, and reported a below-benchmark graduation rate of 17%. The Commission also took note that the program is in teach-out, with the last students expected to graduate in October 2018. The Commission confirmed that the school has filed a Programmatic Teach-Out Plan Approval Form as required, and the last students are scheduled to graduate in October 2020. Therefore, the Commission will continue to monitor the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

Healthcare Administration (BS)

The Commission noted that the Healthcare Administration (BS) program had been operational long enough to be reportable via the Graduation and Employment Chart formula for the first time with the 2017 Annual Report, and reported a below-benchmark rate of 33%. The school was given the opportunity to provide an updated Graduation and Employment Chart, prepared using a Report Date of January 2018; however, it appears that the school did not include the chart in the response to ACCSC. The narrative response refers to the updated rates as 36% graduation and 25% employment. According to the school’s response:

Based on feedback given during our Re-Accreditation visit in March 2017, the college conducted a review of the Healthcare Administration program and did a thorough comparison to other Healthcare Administration programs. The college then made the decision to alter the content of the program to include additional administrative courses and remove lower division clinical courses. A program modification application was submitted to ACCSC for approval and once it is approved, the catalog will be updated to reflect these changes. Until the program changes are approved, the campus has ceased enrollment in the program.

The Commission agrees with the school’s decision to cease enrollment in the Healthcare Administration program until such time as the program objectives, length, and content can be re-evaluated. Although the school provided a copy of the Program Modification application, the Commission is interested in an explanation with regard to the proposed revisions and how the program is designed to achieve the stated objective.

SHC-West Haven (#M070581)

The Commission noted the following with regard to the scope of the student achievement issues at SHC-West Haven. In the 2017 Annual Report and the response to the TSR, SHC-West Haven reported below-benchmark rates of student achievement for five of the school’s nine approved programs that have reportable student achievement outcomes, as outlined in the table below.

SHC-West Haven (#M070581)					
Report Date January 2018					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Accounting (BS)*	36	55%	40%	100%	70%
Business Administration (BS)	36	44%	40%	80%	70%
Business Management and Accounting (AAS) †	20	0%	43%	N/A	70%
Computer Science (BS) †	36	21%	40%	75%	70%
Healthcare Administration (BS)	36	20%	40%	33%	70%
Healthcare Information Management (BS)	36	No starts reported on the Graduation and Employment Chart submitted with the 2017 Annual Report			
Medical Specialties (AOS)	20	23%	43%	75%	70%
Nursing Education (AD)*	20	77%	43%	84%	70%
Surgical Technologist (AOS)*	20	57%	43%	92%	70%
Web Design and Development (BS) †	36	13%	40%	50%	70%

* Graduation and Employment data drawn from the 2017 Annual Report.

† This program is in teach-out.

Business Management and Accounting (AAS)

The Commission noted that the school has reported below-benchmark graduation rates for the Business Management and Accounting (AAS) program with every Annual Report over the school's most recent term of accreditation (2013-2017). The school has made the decision to discontinue the program, with the last students expected to graduate in April 2019. The Commission confirmed that the school filed a Programmatic Teach-Out Plan Approval Form as required. According to the response, "[t]he college is committed to providing all services necessary for students to graduate, as the courses in the Business Management & Accounting AAS program are also offered in the existing Business Administration BS program. Additionally, student and career services will continue to be available to all students and graduates through the Career Services Director." Therefore, the Commission will continue to monitor the school's attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

Computer Science (BS)

The school's response with regard to the Computer Science (BS) program provides a description of strategies implemented to improve rates of student graduation. The school installed a new Academic Dean, who has previous experience working with and motivating youth and providing professional development to instructors in the area of course outcomes and objectives. In addition, the school put a new Associate Dean into place. In addition to these educational administrative changes, the school has implemented closer monitoring of student attendance and failed courses. Students are surveyed monthly, which is showing improved satisfaction with instruction. All education leadership, student services, campus president, and career services personnel participate in a monthly meeting to discuss graduation and employment rates. The Director of Student Services works with dropped students for

the first 90 days after dropping to re-enter them once their difficulties have been resolved, and the admissions department is also focusing on restarting dropped students. SHC-West Haven indicated that the school’s initial assessment shows that these efforts have been effective; however, the school provided no empirical evidence to support this assertion. The Commission will continue to monitor student achievement in this program to ensure the measures are effective in producing above-benchmark student achievement rates.

Healthcare Administration (BS)

In addition to the below-benchmark rates reported above for the Healthcare Administration (BS) program, the Commission noted the history of below-benchmark student achievement rates as follows:

Healthcare Administration (BS)		
Report Date	Graduation	Employment
January 2018	20%	33%
July 2017	33%	0%
July 2016	47%	0%
July 2015	41%	75%
July 2014	33%	50%
July 2013	35%	100%

The school indicated that it examined the reasons for the lack of student achievement for the cohort that enrolled from April 2012 to March 2013. The school’s response indicates that the Dean of Allied Health’s “attention to student academics and their challenges was deficient.” The school replaced the Dean, and promoted an instructor into the position of Associate Dean. The school indicated that the new Associate Dean has improved student retention in the 2017 calendar year, as only 3 students dropped as compared to the 16 that dropped during the “2011/2012 interim cohort” period. Although these initial results appear positive, without graduation or retention rates, it is difficult to gauge the comparability of the two figures. In addition, the Commission is concerned about the historical nature of poor student achievement rates in this program and is interested in whether the new personnel will be able to effect lasting improvements to graduation rates.

With regard to employment rates, the response states that “[o]ne of the key issues for the Healthcare Administration program is the industry’s preference for prior work experience in order for applicants to compete for Healthcare Administrator positions.” The school’s first strategy to address this issue is “encouraging students to take the Gerontology emphasis of this program, which enforces a capstone experience and facilitates the graduates being placed in field. In the state of Utah, there are more administration opportunities in Skilled Nursing facilities with gerontology education.” The response does not explain how much prior work experience is necessary to be considered for Healthcare Administrator positions and how the capstone experience provides this experience.

In addition, the school has submitted a program modification application to increase the opportunities for graduate employment in the Healthcare Administration BS program by adding more administrative content and removing the clinical content in the previous version of the program. Although the school provided a copy of the Program Modification application, the Commission is interested in understanding the context and purpose of the proposed revisions (e.g., the school’s proposed modification to remove clinical content in the face of what the school claimed to be the

industry’s preference for prior work experience). Given the history of poor performance in the area of graduation and employment rates, the Commission found that a deeper analysis is warranted to explain the need and viability of the educational program using external validation (e.g., local demand for training, local employment outlook, earning potential of graduates, other factors that might affect the continued success of the program, etc.). Also given the extent of the questions regarding the efficacy of the program in preparing students for the workplace, the Commission directs the school to **cease enrolling new students in the Healthcare Administration program (BS) program** until the Commission is satisfied that continued enrollment is in the best interest of future potential students.

Medical Specialties (AOS)

In addition to the below-benchmark rates reported above for the Medical Specialties (AOS) program, the Commission noted the history of below-benchmark student achievement rates as follows:

Medical Specialties (AOS)		
Report Date	Graduation	Employment
January 2018	23%	75%
July 2017	22%	71%
July 2016	47%	72%
July 2015	43%	71%
July 2014	42%	67%

The school’s response includes the same description of strategies to improve graduation as those described for the Computer Science (BS) program above. The Commission noted the sharp drop in graduation rates between the 2016 and 2017 Annual Report.

Web Design and Development (BS)

The Web Design and Development (BS) program had been operational long enough to be reportable via the Graduation and Employment Chart formula for the first time with the 2017 Annual Report, and reported below-benchmark rates of graduation (13%) and employment (50%). The Commission took note that the program is in teach-out, with the last students expected to graduate in August 2020. Therefore, the Commission will continue to monitor the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

SHC-Orem (#B070582)

The Commission noted the following with regard to the scope of the student achievement issues at SHC-Orem. With the 2017 Annual Report and the response to the TSR, SHC-Orem reported below-benchmark rates of student achievement for five of the school’s eleven approved programs that have reportable student achievement outcomes, as outlined in the table below.

SHC-Orem (#M070582)					
Report Date December 2017					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Accounting (BS)* †	36	58%	40%	83%	70%

SHC-Orem (#M070582)					
Report Date December 2017					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Business Administration (BS)*	36	58%	40%	71%	70%
Business Management and Accounting (AAS)*	20	46%	43%	89%	70%
Computer Programming (AAS)*	20	100%	43%	N/A**	70%
Computer Science (BS)	36	30%	40%	78%	70%
Computer Technology and Networking (AAS)*	20	44%	43%	75%	70%
Graphic Arts (AAS) †	20	19%	43%	100%	70%
Graphic Arts (BS)	36	29%	40%	75%	70%
Healthcare Administration (BS)	36	37%	40%	23%	70%
Medical Specialties (AOS)	20	60%	43%	63%	70%
Web Design and Development (BS)*	36	30%	40%	100%	70%

* Graduation and Employment data drawn from the 2017 Annual Report.

† This program is in teach-out.

Computer Science (BS)

In addition to the below-benchmark rates reported above, for the Computer Science (BS) program the Commission noted the history of below-benchmark student achievement rates as follows:

Computer Science (BS)		
Report Date	Graduation	Employment
December 2017	30%	78%
July 2017	32%	92%
July 2016	30%	77%
July 2015	28%	76%
July 2014	34%	70%

According to the school’s response,

During the period of time for this cohort, the local market has seen a significant surge in growth and employment in the IT and computer fields. In fact, the local Provo, Utah area has become known as the “Silicone Slopes.” As a result of this explosive growth, the area has seen a shortage of qualified IT employees. As a result of the employee shortage, a number of companies instituted programs where they would hire relatively inexperienced individuals (who had an interest in the computer field) and then the companies would providing [sic] direct education and on-the-job training. A number of the college’s students have taken advantage of these opportunities and chose to move directly into entry-level jobs in the IT field without the time and expense of completing a degree. A final factor identified by the college in late 2016 was the competency of the Associate Dean overseeing the Computer Science BS degree program. The college determined that the Associate Dean was not

effectively engaging with students, troubleshooting student challenges, and helping to drive better retention.

The response describes the school’s strategies being implemented to address these factors. The school indicated it is attempting to help students recognize the value of completing their degrees by providing students with “periodic successes and validations” through earning outside certifications. In addition, the response describes the “Smart Progress Plan” and the “Career Excellence Program.” The school state that these programs are designed to encourage the “better assimilation of the student to the school, and support for the student throughout their particular program timeline.” The response also indicates that the individual hired to replace the Associate Dean has been working with the Director of Career Services and employers to find part-time work for students while in school.

Although the school indicated that the strategies will be successful in improving graduation rates for the 2018 and 2019 cohorts, the school provided no empirical evidence to support these assertions and the Commission questions whether these strategies will be successful when the problem has been identified as a shift in the employment industry. The response also indicates that a baccalaureate degree is no longer required for achieving the employment outcomes. As such, the Commission found that a program viability study is warranted to allow the school to re-align the program length and content with the changed needs of the employers. In context of the reporting history of this program and the yet unresolved issues, be aware that the Commission is will find any failure to conduct an effective assessment and improvement plan for student success in this program to be unacceptable.

Graphic Arts (AAS)

With regard to the Graphic Arts (AAS) program, the school’s response states “[o]f significance has been a decrease in demand for an associates level graphic arts degree by local employers.” The response also states

...it is believed that the Graphic Arts AAS program is not adequately meeting the goal to help prepare students and graduates for entry level graphic arts positions. As a result, the college has determined that it will present the recommendation that the Graphic Arts AAS program be taught out to the Graphic Arts Program Advisory Committee (PAC) at its next meeting on 4/13/18.

Subsequent to the Commission’s review, the school submitted a Programmatic Teach-Out Plan Approval Form, indicating that the last student will graduate in September 2018. The Commission will continue to monitor the school’s attentiveness to fulfilling obligations to its students at the conclusion of the teach-out.

Graphic Arts (BS)

In addition to the below-benchmark rates reported above, for the Graphic Arts (BS) program the Commission noted the history of below-benchmark student achievement rates as follows:

Graphic Arts (BS)		
Report Date	Graduation	Employment
December 2017	29%	75%
July 2017	33%	75%
July 2016	29%	75%
July 2015	47%	75%

Graphic Arts (BS)		
Report Date	Graduation	Employment
July 2014	32%	68%

According to the school's response,

Multiple factors have been identified as contributing to the reduced graduation rates. The college has seen several instances of students leaving school prior to graduation and becoming self-employed using their graphic arts skills. This factor has contributed to smaller cohort sizes result which have had a disproportional impact on the overall graduation rate of the program.

The response describes the strategies that the school has implemented to motivate students to complete the program. These strategies are the same as those described for the Computer Science (BS) program including encouraging students to “earn outside certifications,” and implementation of the Smart Progress Plan and Career Excellence Program. The Commission recognized the value of such student retention issues; however, it does not appear that the school has addressed the underlying factor identified in the response – expressly that students are able to become self-employed without completing the program warrants a program viability study to determine the content and length are aligned with the program objectives. Given that the graduation rates have been below benchmark for three of the four most recent annual reports to ACCSC, it does not appear that the school has adequately identified and addressed the factors impacting the rate of student graduation.

Healthcare Administration (BS)

In addition to the below-benchmark rates reported above, for the Healthcare Administration (BS) program the Commission noted the history of below-benchmark student achievement rates as follows:

Healthcare Administration (BS)		
Report Date	Graduation	Employment
December 2017	37%	23%
July 2017	40%	18%
July 2016	37%	56%
July 2015	31%	56%
July 2014	36%	67%

According to the school's response,

Several factors are at play with the employment rate reported for Healthcare Administration graduates. First, within the healthcare industry, many titles and job descriptions have specific connotations. In a healthcare setting, the job title of director or administrator is generally reserved for individual with multiple years of experience. An individual graduating with an undergraduate degree in healthcare administration is expected to take entry level positions in a healthcare organization or department, and grow and advance within the organizational structure. Healthcare organizations in the state expect individuals interested in becoming administrators to advance from within the company. As a result, while many of the graduates of the Healthcare Administration program work within the healthcare industry, they were not employed as directors and administrators, but were employed in entry level

positions. As a result, ACCSC's Standards would not allow the college to classify these graduates as adequately employed for the purposes of the ACCSC report.

It appears, from the school's analysis, that the Healthcare Administration (BS) program is insufficient to prepare graduates for positions as directors or administrators, as work experience is also required in order to be eligible for these positions. Therefore, it is not clear that the program objectives are reasonable and supported by the program content and length. The school indicated that the Director of Career Services meets with students early to obtain employment in the healthcare industry that accommodates the students' hours so they can begin accumulating work experience while completing their degrees.

In addition, the school has submitted a program modification application to increase the potential for employment in the Healthcare Administration BS program. Although the school provided a copy of the Program Modification application, the Commission is interested in understanding the context and purpose of the proposed revisions. Given the history of poor performance of this program, particularly with regard to employment rates, the Commission found that a deeper analysis is warranted to explain the need and viability of the educational program using external validation (e.g., local demand for training, local employment outlook, earning potential of graduates, other factors that might affect the continued success of the program, etc.). Also given the extent of the questions regarding the efficacy of the program in preparing students for the workplace, the Commission directs the school to **cease enrolling new students in the Healthcare Administration program (BS) program** until such time as the Commission is satisfied that continued enrollment is in the best interest of future potential students.

Medical Specialties (AOS)

With regard to the Medical Specialties program, the school indicated the following:

Two factors were identified as impacting the employment results for this cohort. First, there have been a number of local-market building projects underway that have affected the healthcare industry. These building projects include a local regional medical center and a major expansions [sic] to two of the large multispecialty practice groups in the area. All three of these projects have experienced significant delays in completion - which resulted in a staffing delays. As these facilities have finally opened, more employment opportunities have become available to medical specialties graduates. As a result, the 2017 Medical Specialties cohort exceeds the ACCSC Employment Benchmark at 73%.

Although the response refers to two factors, the only factor described is the reduced employment opportunities resulting from delayed building projects. As that temporary situation may have been resolved, the school indicated that the 2017 cohort of students exceeds ACCSC's benchmark. The Commission noted that the school reported an employment rate of 66% with the 2016 Annual Report, 73% with the 2017 Annual Report, and 63% with the response (on a Graduation and Employment Chart prepared using a December 2017 Report Date). The Commission found that the school has not made a compelling case that the factors impacting the Medical Specialties (AOS) program have been adequately identified and addressed.

Web Design and Development (BS)

The Web Design and Development (BS) had been operational long enough to be reportable via the Graduation and Employment Chart formula for the first time with the 2017 Annual Report, and reported a below-benchmark graduation rate of 30%. SHC-Orem has not yet had an opportunity to

provide additional information. Therefore, the Commission will direct the school to provide updated student achievement rates for this program.

SHC-Murray (#B070583)

The Commission noted the following with regard to the scope of the student achievement issues at SHC-Murray. With the 2017 Annual Report and the response to the TSR, SHC-Murray reported below-benchmark rates of student achievement for **five** of the school’s **thirteen** approved programs that have reportable student achievement outcomes, as outlined in the table below.

SHC-Murray (#M070583)					
Report Date January 2018					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Accounting (BS)*	36	61%	40%	82%	70%
Business Administration (BS)	36	30%	40%	75%	70%
Business Management and Accounting (AAS)	20	39%	43%	60%	70%
Computer Science (BS)* †	36	52%	40%	75%	70%
Computer Science-DE (BS)	36	12%	40%	27%	70%
Computer Technology and Networking (AAS)	20	61%	43%	79%	70%
Healthcare Administration (BS) †	36	52%	40%	57%	70%
Healthcare Administration (MS)	15	85%	50%	0%	70%
Information Systems (MS)*	15	No Starts During the Reporting Period of the 2017 Annual Report			
Master of Business Administration (MBA)*	15	80%	50%	100%	70%
Medical Specialties (AOS)*	20	45%	43%	76%	70%
Respiratory Therapy (AS)*	21	61%	43%	73%	70%
Web Design and Development (BS) *	36	0%	40%	N/A	70%

* Graduation and Employment data drawn from the 2017 Annual Report.

† This program is in teach-out.

Business Administration (BS) and Business Management and Accounting (AAS)

According to the school’s response, based on the analysis of data by the Dean of the School of Business, the issues, resources, and solutions are the same for both the Business Administration (BS) and Business Management and Accounting (AAS) programs. The reasons listed for students dropping out are students with medical issues who do not provide documentation, academics, conflicts with work schedules, and family issues. The response describes the strategies the school is using to address the factors listed above. The school holds monthly campus-wide retention meetings to discuss students who appear to be at-risk of dropping out. The Director of Student Services calls all students at different times to check in with their progress. For students who inform the school that they are

dropping due to medical reasons, the school has implemented a new procedure whereby the student has to meet with the Registrar to see if a schedule adjustment will allow the student to stay enrolled. Also, the school is re-emphasizing the importance of collecting documentation with regard to the medical condition.

To address the academic factors, the Dean of the School of Business meets with all new and returning students in the first two weeks of class to build stronger relationships. Also, the Dean’s office was moved to a more central and easily accessible location. The school indicated that students are strongly encouraged to meet with their academic leaders on a regular basis. Grades and attendance are monitored and students that appear to be “at-risk” are contacted for advising. The school has chosen the “most dynamic, engaging, and motivational instructor” to teach the first course that students take: Psychology of Motivation (CSS 101). The second course, which is a Computer Fundamentals course, has been revised to include more real-world situations and assignments, and to incorporate more outside resources.

With regard to the issue of work schedules, the school indicated that the Career Services and Student Services personnel assist in finding temporary work for students that is suitable to their school schedules. In addition, the school stated that it encourages employers and Program Advisory Committee members to hire students in part-time positions that allow them to gain experience while completing their programs. For family issues, the school indicated that the Student Services Department attempts to assist with finding community resources. In cases where a student is not able to attend the on-ground campus due to relocation, “the student is made aware of our affiliated institution, IU-Salt Lake City which offers fully-online programs; allowing program completion regardless of location.”

Based on an assessment of the success of the strategies outlined above, the school concluded that both the Business Administration and Business Management and Accounting (AAS) will continue to show improved rates of student graduation. The Commission noted the history of below-benchmark student achievement rates reported for the two programs, as outlined in the tables below. It is not clear that the school has conducted an effective analysis of the underlying factors or that the strategies implemented will support lasting improvements in student achievement rates.

Business Administration (BS)		
Report Date	Graduation	Employment
January 2018	30%	75%
July 2017	35%	17%
July 2016	19%	100%
July 2015	36%	80%
July 2014	24%	100%

Business Management and Accounting (AAS)		
Report Date	Graduation	Employment
January 2018	39%	60%
July 2017	49%	72%
July 2016	41%	71%
July 2015	36%	85%
July 2014	42%	83%

Computer Science-DE (BS)

With regard to the Computer Science-DE (BS) program, the school’s response states that “[t]he college has determined that the Computer Science and the Healthcare Administration programs are not viable at this time and have chosen to teach them out.” The Commission confirmed that the school submitted a Programmatic Teach-Out Plan Approval Form, indicating that the last student will graduate in March 2020. The Commission will continue to monitor the school’s attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

Healthcare Administration (BS)

With regard to the Healthcare Administration (BS) degree program, the school's response states that "[t]he college has determined that the Computer Science and the Healthcare Administration programs are not viable at this time and have chosen to teach them out." The Commission confirmed that the school submitted a Programmatic Teach-Out Plan Approval Form, indicating that the last student will graduate in October 2020. The Commission will continue to monitor the school's attentiveness to fulfilling obligations to its students throughout the conclusion of the teach-out.

Healthcare Administration (MS)

The school's response identifies two factors affecting the employment rate in the Healthcare Administration (MS) program. First is the predominance of international students:

The Healthcare Administration MS program enrolls mostly international students here in the U.S on Student Visas. They are not eligible to work permanently in this country. Of the students in the 2017 cohort there were a total of twelve students with nine being ineligible to work. Of the three remaining, one was employed in field. This scenario is typical of this program where the eligible graduates are such a small cohort that there is an all or nothing scenario. For the Interim Report there were 11 graduates but 10 were ineligible, leaving ONE graduate available to work. She is currently underemployed but the campus is working with her to gain a promotion. For the 2018 cohort there are 14 graduates but 13 were ineligible, leaving ONE graduate available to work.

The Commission is concerned that because of the way in which the school reported international students, the rates of student achievement do not include the results for a majority of the students. Although international students may be accurately reported as "unavailable for employment" in accordance with the instructions to the Graduation and Employment Chart, if the school has proper documentation demonstrating that the graduate is employed in field, it is a better reflection of the success of the student in achieving the objectives of the program to report that graduate "Employed in Field." In absence of employment information for a majority of the school's graduates, it is difficult to determine that the nature of the program is vocational, is appropriately included within the school's scope of ACCSC accreditation, and is demonstrating successful student achievement. Therefore, the Commission will request additional information with regard to international graduates and their employment status.

The school's response also states that the school has:

...determined that without experience in the medical field prior to graduation is a major hurdle. The research through Job Pulse suggests the positions for a Master's in Healthcare Administration require anywhere from 3 to 7 years' experience in the field. Therefore the campus has implemented an admissions requirement of 5 years prior experience in the healthcare field to enroll in this program.

The Commission recognized the school's effort to admit only those students capable of benefitting from the training; however, from the catalog excerpt it appears that the new admissions requirement is for "domestic" students only. This deepens the Commission's question with regard to the purpose of this program for the international students, if it is not intended to prepare them for positions as Healthcare Administrators. Therefore, the Commission found that additional information with regard to this program is required.

Web Design and Development (BS)

The Web Design and Development (BS) program had been operational long enough to be reportable for the first time with the 2017 Annual Report, and reported a below-benchmark graduation rate of 0%. The Commission noted that the school has yet to provide supplementary information and therefore, will afford the school the opportunity to do so before taking further action.

SHC-Logan (#B070584)

The Commission noted the following with regard to the scope of the student achievement issues at SHC-Logan. With the 2017 Annual Report and the response to the TSR, SHC-Logan reported below-benchmark rates of student achievement for one of the school’s seven approved programs that have reportable student achievement outcomes, as outlined in the table below.

SHC-Logan (#M070584)					
Report Date January 2018					
Program (Credential)	Length in Months	Reported Graduation Rate	ACCSC Benchmark Graduation Rate	Reported Employment Rate	ACCSC Benchmark Employment Rate
Accounting (BS)*	36	75%	40%	71%	70%
Business Administration (BS)	36	42%	40%	80%	70%
Business Management and Accounting (AAS) †	20	40%	43%	0%	70%
Computer Science (BS)*	36	45%	40%	80%	70%
Graphic Arts (AAS)	20	75%	43%	100%	70%
Medical Specialties (AOS)*	20	54%	43%	82%	70%
Web Design and Development (BS) †	36	50%	40%	100%	70%

* Graduation and Employment data drawn from the 2017 Annual Report.

† This program is in teach-out.

Business Management and Accounting (AAS) is the only program for which the school is reporting below benchmark rates of student achievement. According to the school’s response, “because of the small enrollment, the campus has decided to teach out this program. The Commission confirmed that the school submitted the Programmatic Teach-Out Approval Form, and the last student was scheduled to graduate as of June 24, 2018. Therefore, no additional information is required.

Based on the foregoing, the Commission noted that the school’s strategies have not been successful to this point, and advises the school that in absence of a demonstration of improving student graduation and graduate employment rates, the schools cannot demonstrate that appropriate action has been taken to improve student success.

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

- a. An analysis of student achievement outcomes for CEHE-affiliated schools that explains the breadth of student achievement outcomes issues across the entire system of schools, as well as the

history of reporting below-benchmark rates of student achievement. The analysis should identify the issues that are system-wide and those factors that are unique to each school.

- b. An explanation as to how CEHE is addressing the factors identified in above.
- c. For programs that have lower enrollments (e.g., fewer than 10 students a year), explain how the school is able to continue to devote ongoing resources to the smaller programs, and why the school continues to offer programs that in the school’s assessment cannot provide consistent results due to the low enrollments.⁴
- d. A Graduation and Employment Chart for the programs identified as reporting below benchmark rates for each school listed above, using a **July 2018 Report Date**. Please use the most recent Graduation and Employment Chart available from the Commission’s website at www.accsc.org.
- e. Summary tables of the graduation rates and employment rates for the July 2018 Report Date as compared to the last two Annual Reports using the following format:

School Name/Location

Program Title (Credential)	Length Mos.	Grad Rate			Grad Benchmark	Employment Rate			Employment Benchmark
		2016	2017	2018		2016	2017	2018	

- f. For each Graduation and Employment Chart submitted, provide supporting summary information for the graduation and employment data organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
 - i. For each student reported provide the following information:

Student Name	Program	Start Date	Graduation Date	Withdrawal/ Termination Date

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

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

- iii. For each graduate reported, provide the following information:

Graduate Name	Program	Start Date	Employer Name, Address, & Ph.#	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title	Other Status (Unemployed, Further Ed., Unknown, Etc.)

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

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

⁴ The Commission was not persuaded that simply having fewer students in a program is a mitigating factor for poor graduation rates.

- g. For each program the schools have discontinued and are still active, provide a description of the status of the programmatic teach-out and how the school is remaining attentive to student needs, particularly in the area of career services.
- h. For each active program for which the reported rates of student graduation and graduate employment do not meet the ACCSC benchmark, the school must provide a justification for offering the program on an ongoing basis. This justification must include an updated assessment of the factors impacting the rates of student graduation (e.g., admissions requirements and student support) and graduate employment (e.g., economic conditions), how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies.
- i. For each program where the reported rates of student graduation and/or graduate employment do not meet the ACCSC benchmark, the school may consider providing more contemporaneous data.
 - For programs that report below-benchmark rates of student graduation, the school may complete an **ACCSC Retention Chart** to show more recent data with regard to retention.
 - For programs that report below-below benchmark rates of graduate employment, the school may provide a list of graduates from that program for the last six months and employment information, in the following format:

Graduate Name	Program	Start Date	Employer Name, Address, & Phone #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title	Other Status (Unemployed, Further Ed., Unknown, Etc.)

- 5. CEHE did not demonstrate that prior to enrollment the school secures documentation to demonstrate that each applicant meets all admissions requirements (*Section V (A)(4)(b), Substantive Standards, Standards of Accreditation*). The issues in question are related to whether CEHE schools secure admissions documentation to enrollment and to the fair treatment of prospective students in the admissions process.

SHC-West Haven (#M070581)

The February 16, 2018 TSR raises a question regarding the timing of when admissions documentation is secured and when the school makes the official admissions decision, signified by the school’s official’s signature on the enrollment agreement. As stated in the TSR, the on-site evaluation team found at SHC-West Haven that:

According to the policy stated in the catalog, admission to the Nursing Education program requires CPR certification, immunizations, an approved health history, and proof of health insurance. In contrast school personnel indicated that a student can be admitted without these items as long as they secure both before starting a clinical, or one month prior to core course start. An applicant is not denied admission when documentation of the aforementioned items is not secured prior to enrollment. The school provided a catalog addendum revising the timing of meeting these conditions prior to starting clinical courses; however, it is not clear how the school is determining an applicant’s ability to complete the program in absence of evaluating these conditions prior to admission.

In response, the school indicated that it has revised the catalog to require that all CPR certification, immunizations, an approved health history, and proof of health insurance be received prior to starting

the program. The school now collects and evaluates all the above documents prior to a students' first day of class. The Commission noted, however, that ACCSC requires that all admissions documentation is secured prior to enrollment, signified by the college official's signature on the enrollment agreement (see *Appendix V, Standards of Accreditation*). As stated in the Appendix, the Commission has interpreted that "prior to enrollment" in the context of *Section V (A)(4)(a-b)* means prior to the acceptance of the student through the full execution of the enrollment agreement (e.g., signed by the accepting school official) and before allowing a student to start classes. As a practical matter, the Commission concluded that a student may sign an enrollment agreement and a school may communicate conditional or provisional acceptance of a student prior to receipt of documentation that admissions criteria have been met. However, a school may not consider a student fully enrolled and may not allow a student to start classes without the requisite documentation. Thus, each school must have a policy and procedure for ensuring that admission documentation is secured prior to fully executing the enrollment agreement and allowing the student to start class. The Commission also concluded that this interpretation applies equally to "conditional" or "trial" periods of enrollment. Therefore, the stated policy of securing documentation before the students' first day of class is insufficient to determine the schools are in compliance with accrediting standards, without other information.

The school's response includes a copy of the catalog page describing the required documentation, including high school graduation or equivalent, HESI A2 admissions examination, Michigan language score of at least 80%, SLE exam score of at least 22, negative drug screen, criminal background check, proctored essay, personal interview with the dean of nursing, and two letters of recommendation. As noted in the TSR, the catalog indicates that prior to starting clinicals, students must become certified in CPR, have a battery of immunizations, student health insurance, and completed healthy history and current physical. Since these requirements are not evaluated prior to enrollment, it is not clear how the failure to secure these items affects the students' ability to complete the program as promised. For four students, the school provided documentation that the student meets the aforementioned admissions requirements; however, it is not clear that the school is collecting the required documentation prior to enrollment.

SHC-Orem (#M070581), SHC-Idaho Falls (#B072351), and SHC-Logan (#B070584)

The TSRs for SHC-Orem, SHC-Idaho Falls, and SHC-Logan indicate that the schools do not consistently secure documentation of the Computer Literacy Assessment ("CLA") used to assess whether students have the skills, competencies, and access to technology necessary to succeed in a distance education environment (*Section V (A)(4)(b) and Section IX (E), Substantive Standards, Standards of Accreditation*). In the responses, the schools indicated that many students will take distance education courses via consortium agreements with IU-Salt Lake City, CEHE's online education provider. With the addition of the courses delivered by the schools via a hybrid delivery, the schools decided that every applicant has the potential to become a distance education student and that it would be more efficient to incorporate the readiness assessment as part of the admissions requirements. The schools implemented this new process in January 2017. As documentation that the new process has been successfully implemented, Stevens-Henager-Orem provided a list of 69 students admitted since the on-site evaluation in April 2017 and listed a date, presumably the date the student took the CLA. Although the response indicates certificates are included in the response, there are no certificates or other documentation to support the validity of the data provided in the list. SHC-Logan indicated that one student identified in the finding did not take the CLA assessment; however, the school accepted the students' achievement of a B+ in a Computer Fundamentals class as evidence that the student would do well in a distance education environment. The response does not include

any information with regard to the course and how it was determined that understanding the fundamentals of a computer translates into readiness for and success in the distance education environment. SHC- Idaho Falls provided copies of certificates for 74 students, and SHC-Logan provided copies of certificates for 13 students. Although the certificates indicate the date of the examination and the score achieved, the response does not provide the students' start dates to show the assessment occurred prior to enrollment. In addition, the Commission is interested in reviewing copies of the completed CLAs, rather than certificates of completion.

SHC-Logan (#B070584)

The February 16, 2018 TSR raises a question with regard to the documentation of the denial of admissions. As stated in the TSR, the on-site evaluation team found that:

As evidence of denied admissions, the school first provided copies of the Career Questionnaire form with informal notes from the school director and director of admissions explaining why students could not be admitted into the school. SHC-Logan explained that those notes were “informal” and subsequently provided records from Velocify - a salesforce software the school uses to generate phone calls to interested applicants – as evidence of the denial of admissions procedure. The Velocify documentation also included notes from staff indicating the school had reached out to the students after their interview and according to the school, the student never followed up/further pursued an education. In these cases, SHC-Logan explained that the school did not consider these students to have been denied admission. That notwithstanding, since the school provided this information when the team requested the denied admissions file, the team reviewed the information as the denied admissions documentation and found that the information does not clearly show that the school maintains documentation explaining the basis for any denial of admission.

In response, the school indicated that there was some confusion regarding what was meant by a “denied applicant,” and as a result during the on-site evaluation, SHC-Logan inadvertently supplied documentation for prospective students who never officially applied, and therefore could not be considered officially denied admission.

The Logan campus admissions team was not clear on this process and agrees with this finding. Upon review, when the Honored Guest Questionnaires were originally put in the campuses “Denied Binder” there was confusion on the definition of a denied applicant. The specific students outlined in the finding did not ever apply for admissions or sign enrollment agreements; therefore they were never technically denied admissions to the college. The admission team is now fully trained on what constitutes “denied admission” and the appropriate documentation procedures moving forward.

The response includes copies of the “Career Questionnaires” completed by 22 prospective students that were denied admissions. Although SHC-Logan represents these “Career Questionnaires” as the “Denied Admissions Binder Updated,” it is not clear from the response whether the Career Questionnaires constitute the official application to the school. The questionnaires were dated mostly from the years 2012 and 2013, with one from May 2014 and one from March 2015. The words “needs her GED,” “denied-GED,” “needs GED,” “GED first” “denied-needs GED” are written on the questionnaires. The response does not explain whether the Velocify software is currently in use as part of the school’s recordkeeping. The Commission found that SHC-Logan’s response does not provide sufficient information with regard to the school’s current practices around denial of

admissions and is therefore interested in reviewing stated policies and procedures in conjunction with the most recent records.

In addition, the February 16, 2018 TSR raised questions with regard to whether SHC-Logan neither denies admission nor discriminates against students enrolled at the school on the basis of race, religion, color, gender, sexual orientation, genetic information, age, disability, or national origin. The TSR states the notes on the Career Questionnaire and the notes from Velocify appear to indicate that the school denied students admission for reasons other than those outlined in the school's admissions requirements. In several cases, the notes included commentary with regard to conditions that are not admissions requirements, including perceived disabilities, U.S. citizenship, English-speaking proficiency, and criminal backgrounds. The following were recorded as examples of the school's notes in the TSR:

- "Very hard to understand. Trying to get citizenship. Has an appointment June 2nd. Needs to work on his English [sic]."
- "Referred her to the English Language Learning Center. Medical Specialties. Quiet, emotional."
- "Very nice. She is not a citizen." Applicant checked "yes" to having a greencard."
- "Appointment showed, CD/DOA Interview. Students doesn't know why he scheduled an appointment. After spending over an hours it's my determination that there is a mental disability with this student."
- "Very hard to understand."
- The school indicated that he had a "mental block." The Velocify record stated, "DO NOT LET HIM MAKE ANOTHER APPOINTMENT. Thanks"
- Applicant checked "yes" to having a green card. School noted "non citizen"
- The school noted, "not all there."
- The school wrote, "denied criminal background, not employable."
- Applicant checked "yes" to having a green card. School noted "not a citizen."

SHC-Logan did not provide a separate response to the issue of denying applicants based on attributes that do not appear to pertain to admissions requirements. The Commission noted, in reviewing the Career Questionnaires – referred to as "Honest Guest Questionnaires" in the response - the following notes about prospective students that do not appear to pertain to admissions criteria: "denied-no GED/citizenship," "denied no GED equiv or citizenship," and "not too nice." The Commission found the comments noted in the TSR and the response to be off topic at best and otherwise disparaging and indicative of potential discriminatory practices.

The Commission understands and expects that schools will establish admissions criteria that serve as indicia of an applicant's level of preparation for and likelihood of success in an educational program. Taking all of the CEHE issues into account, however, the Commission has several questions regarding the connections between marketing, recruitment, admissions, and student outcomes. The school appears to market to low income students stressing the availability of financial aid and scholarships, turns some of those students away for reasons that may not be clearly articulated in admissions criteria, and claims that the reasons for its low graduation outcomes are the characteristics of the students that it has chosen to recruit and admit by establishing a campus in those communities. In the Commission's eyes, this is a paradox that the school has yet to adequately explain or justify and likely serves as a primary predicate for many of the issues articulated through this letter.

Based on the foregoing, the Commission found that CEHE has not demonstrated that the schools adhere to stated criteria in making admissions decisions and secure documentation to show the basis of admissions decisions prior to enrollment. In addition, the Commission seeks further information with regard to comments made by school employees that may be indicative of discriminatory practices occurring at CEHE schools. Accordingly, the Commission directs CEHE to submit the following:

- a. An explanation as to whether there is one set of admissions policies and procedures designed to be implemented at all CEHE schools, or if each campus is responsible for designing and implementing admissions criteria;
- b. An explanation of the admissions process, including the purpose of the “Career Questionnaire” in the admissions process and the document that is considered to be the official application for admission;
- c. An explanation regarding the comments on Career Questionnaires at SHC-Logan, including which staff members are making the comments and how those comments are used in the admissions process;
- d. A list of the ten most recent applicants to each CEHE-affiliated school, in the following format:

School Name (School Number)				
Student ID	Program	Date of Application	Admissions Decision (Admit or Deny)	Start Date, if applicable

- e. Copies of completed Career Questionnaires (and official admissions applications, if different), Computer Literacy Assessments, admissions documentation, and enrollment agreements for the applicants listed above; and
 - f. A description of how CEHE ensures that students are adequately prepared to take classes via distance education, and the accommodations made if the assessment indicates the student will not do well in that learning environment.
6. CEHE did not demonstrate than an applicant requesting cancellation more than three days after signing an enrollment agreement and making an initial payment, but prior to entering the school, is entitled to a refund of all monies paid minus a registration fee of up to \$150. (*Section I (D)(4)(b), Substantive Standards, Standards of Accreditation*). The February 16, 2018 TSR for SHC-West Haven raised a question with regard to the school’s policy to collect a \$3,500 non-refundable fee for international students who have been accepted in the school unless the student is denied a student visa. While SHC-West Haven appears to have indicated to the team that the school does not currently enroll international students, the school indicated future plans to pursue international student enrollment, and the policy, as written, would preclude an international student from requesting cancellation and receiving an appropriate refund in accordance with the standard. SHC-West Haven responded as follows:

The campus did not have an international program at the time of the visit and did not accept international students as it was in the process of being accepted by SEVIS. This policy did not apply to this campus. At the time of the visit, this policy only applied to the Stevens-Henager Murray campus and the visiting team for the Murray campus did not see this as a finding. Notwithstanding the aforementioned, the College updated its refund policy related to

international student enrollment and corrected the student catalog and the enrollment agreement. The school collects a refundable fee of \$3,500 for international students who have been accepted into the school. If an international student cancels their enrollment prior to attending classes, a full refund is made within 30 days of the notice of cancellation. This updated policy meets the standards found in Section I (D)(4)(b), Substantive Standards, Standards of Accreditation.

The response includes a copy of a blank enrollment agreement for international students. The blank enrollment agreements shows the cancellation policy has been revised to indicate that all monies paid will be refunded if cancellation occurs within three business days of signing the enrollment agreement, or for students who have not visited the campus, within three business days following a tour of the college facilities and inspection of equipment. The blank form does not show how the \$3,500 fee is disclosed on the enrollment agreement. The response also includes an excerpt from the catalog that identifies the \$3,500 application fee; however, it does not show the revised cancellation policy. In addition to ensuring the application fee and cancellation policies are clearly disclosed, the Commission is interested in reviewing documentation that the policy has been implemented.

Based on the foregoing, the Commission directs CEHE to submit the following:

- a. A complete copy of each school's catalog, cross-referenced to the *ACCSC Catalog Checklist*;
 - b. A list of schools in the CEHE system that accept "international" students and specify the programs into which international students may enroll;
 - c. A list of the international students currently enrolled at each of the schools listed above;
 - d. Copies of completed enrollment agreements executed for the international students listed above, showing how charges are disclosed;
 - e. Copies of student account records for the international students listed above, showing how tuition and fees are charged; and
 - f. A comparison of the application fees charged to US residents with those charged to international students and the basis for the school's determination that a \$3,500 application fee is appropriate for international students.
7. CEHE did not demonstrate the validity of student achievement outcomes reported to the Commission (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In examining the Graduation and Employment ("G&E") Charts provided by the schools as part of the responses and outcomes reports as well as Annual Reports, the Commission noted a disparity between the numbers of students reported as "Transfers to Another Program,"⁵ and the numbers of students reported as "Transfers from Another Program."⁶ Because the "transfer-out" category removes a student from the graduation rate calculation it is particularly important to clearly account for these students as "transfers-in" on the G&E Chart of the program where the student transferred. Without a clear accounting for the students' transfer into other program(s) at the same school, the transfer-out classification is not verifiable.

⁵ Defined as "[t]he total number of students who transferred out of this program and into another ACCSC-approved program at the school."

⁶ Defined as "[t]he total number of students who transferred into this program from another ACCSC-approved program at the school, and whose progress in the program is concurrent with the students in this class start date."

The Commission understood that various factors might prevent the number of transfers out to other programs from matching the transfers into other programs exactly and therefore looked at the Graduation and Employment Charts submitted with the 2013 through 2017 Annual Reports for all the programs that are currently active at the nine schools under review. Of the 23,063 reported starts, 2080 were reported to have *transferred out* of the original program to another program at the school; however, only 207 were reported to have *transferred in* from another program. This appears to leave 1,873 students unaccounted for on Graduation and Employment Charts over the last five years. Again, this is important because the ‘transfer out’ category removes a student from the graduation rate calculation for one program and the ‘transfer in’ category adds a student to the graduation rate calculation. The loss of or mis-categorization of 1,873 student would have an impact on the graduation rates reported.

The following tables provide a breakdown of the results for the individual schools and for the programs for which the school reported the largest disparity between transfers out and transfers in.

CCSD (#M001073)				
	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
Total	5805	811	51	760

IU-Salt Lake City (#B072309)				
	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
Total	5607	162	49	113

SHC-West Haven (#M070581)				
	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
Total	2074	224	26	198

SHC-Orem (#B070582)				
	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
Total	2052	377	39	338

SHC-Murray (#B070583)				
	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
Total	3607	353	21	332

SHC-Logan (#B070584)				
	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
Total	912	80	5	75

The following three schools reported discrepancies between transfers out and transfers in to a lesser magnitude than the six listed above:

School	Starts	Transfers Out to Other Programs	Transfers In from Other Programs	Difference
CA-Flagstaff (#M070742)	1081	27	4	23
CA-Phoenix (#B070743)	1638	33	8	21
SHC-Idaho Falls (#B072351)	287	13	4	9

CEHE’s responses indicate that the school has used the new starts column on the G&E charts to capture and report both new starts, and transfer-ins from other programs on campus. For example in the CCSD response the school stated that when the on-site evaluation team pointed this out as a concern, the “CEHE Compliance Department immediately began a review of the campuses 2016 G&E charts. Following the review, the campus demonstrated to the Team that all ‘transfer-outs’ were appropriately accounted for in the new start numbers in 2016.” CEHE also stated the schools added a new process for the 2017 Annual Report that included an individual review of each transfer out to determine which cohort to report the transfer-in. This process was completed prior to submission of the 2017 Annual Report and the schools provided corrected 2016 G&E charts and a copy 2017 G&E charts.

The Commission noted that the response does not include documentation to demonstrate that those students from the 2016 Annual Report classified as transfers-out, were in fact captured in the new starts category on another program’s chart as claimed above. Furthermore, the response does not include any supporting documentation to align with the 2017 data to demonstrate that the school is now accurately reporting transfers out and transfers in.

Overall, the Commission acknowledges the school’s above assertions but given the lack of documentation, found that the disparity between the numbers of students reported to have transferred out to other programs within the schools and the numbers that transferred into programs within the schools raises the question as to whether the schools are accurately accounting for all students on the G&E Charts. Given the lack of documentation and the numbers of students affected, it is critical that CEHE examine the schools’ policies and procedures for reporting transfers to ensure the schools are providing an accurate picture of student success.

Based on the foregoing, the Commission directs CEHE to submit the following:

- a. A copy of each school’s policies and procedures for reporting “Transfers to Another Program” and “Transfers from Another Program”;
- b. A copy of the Graduation and Employment Charts for all schools from the 2016 Annual Report as submitted through the ACCSC portal;
- c. To show that student starts from the 2016 Annual Report classified as transfers-out, were in fact captured in the new starts category on a subsequent chart in the following format, for each campus provide the following:

Campus Name/Location/Number Annual Report Date 2016

Program Name	Total Starts	Transfers Out to Other Programs	Transfers In from Other Programs

Student ID	Program Name/Cohort Start Date	Date Transferred Out	Program Name Transferred Into as New Start	Cohort Start Date in Program Transferred Into	Other Subsequent Transfer Information

- d. A copy of the Graduation and Employment Charts for all schools from the 2017 Annual Report as submitted through the ACCSC portal;
- e. To show that student starts from the 2017 Annual Report classified as transfers-out, were in fact captured in the new starts category on a subsequent chart in the following format, for each campus provide the following:

Campus Name/Location/Number Annual Report Date 2017

Program Name	Total Starts	Transfers Out to Other Programs	Transfers In from Other Programs

Student ID	Program Name/Cohort Start Date	Date Transferred Out	Program Name Transferred Into as New Start	Cohort Start Date in Program Transferred Into	Other Subsequent Transfer Information

- f. For the 2018 Graduation and Employment Charts required as part of the response to this letter, submit the following:

Campus Name/Location/Number – July 2018 Report Date

Program Name	Total Starts	Transfers Out to Other Programs	Transfers In from Other Programs

Student ID	Program Name/Cohort Start Date	Date Transferred Out	Program Name Transferred Into as New Start	Cohort Start Date in Program Transferred Into	Other Subsequent Transfer Information

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 student achievement outcomes requirements
8. CEHE must demonstrate that students are achieving the objectives of the programs, specifically with regard to employment in the field for which training is provided (*Section VII, Statement of Purpose, Standards of Accreditation*). In examining the Graduation and Employment Charts for the schools under review, the Commission noted the extent to which graduates are going on to further their education rather than obtaining employment in the field for which trained. The Commission looked at

the Graduation and Employment Charts submitted with the 2013-2017 Annual Reports for all the programs that are currently active at the nine schools under review, as outlined in the tables below. As noted previously, the Commission used the five most recent Annual Reports, to avoid overlapping reporting periods.

First, the Commission looked at the distribution of graduates excluded from the employment rate calculations due to further education classifications by program area and level. Based on the data outlined in the table below, it appears that in some cases, significant portions of the graduate population are not achieving the vocational outcomes of the program. Although further education in the form of at least half-time enrollment at an accredited institution is considered an acceptable exemption from the employment rate calculation, the extent to which the schools are using this category raises questions with regard to the school’s ability to demonstrate successful student achievement. For example, the Computer Technology & Networking (AAS) program which has the largest percentage of graduates in this category, has excluded nearly one-third of the graduates from the employment rate calculations. The Commission also noted the number of graduates from the Healthcare Administration (BS) program that were reported to be furthering their education, an outcome that does not necessarily appear to be congruent with the completion of a baccalaureate degree program. Therefore, the Commission is interested in the school’s analysis of these programs in context of the number of graduates that seek further education rather than go on to vocational objectives.

Aggregated by Program				
Program	Credential	Graduates	Graduates- Further Education	Percentage
Computer Technology & Networking	AAS	367	101	28%
Business Management and Accounting	AAS	791	57	20%
Graphic Arts	AAS	202	33	16%
Healthcare Administration	BS	436	56	13%
Respiratory Therapy	AS	1973	239	12%
Medical Specialties	AOS	3026	347	11%
Business Administration	BS	302	20	7%
Computer Science	BS	341	22	6%

Second, the Commission reviewed the aggregated data by school and noted that the further education category is used more often at CCSD and its satellite location (SL460448), as well as CA-Flagstaff and CA-Phoenix. The Commission is interested in the school’s analysis as to why these four locations have a higher number of graduates that go on to further education.

Aggregated Data by School				
School	ACCSC Number	Graduates	Graduates- Further Education	Percentage
CCSD	M001073	2362	496	21%
CCSD-Satellite Location	SL460448	233	73	31%
CA-Flagstaff	M070742	494	84	17%
CA-Phoenix	B070743	749	105	14%
IU-Salt Lake City	B072309	2221	149	7%
SHC-Logan	B070584	333	22	7%

Aggregated Data by School				
School	ACCSC Number	Graduates	Graduates-Further Education	Percentage
SHC-Orem	B070582	812	52	6%
SHC-Idaho Falls	B072351	111	6	5%
SHC-Murray	B070583	1174	63	5%
SHC-West Haven	M070581	864	35	4%

Based on the foregoing, the Commission directs CEHE to submit the following:

- a. An analysis of the Business Management & Accounting (AAS), Computer Technology & Networking (AAS), Graphic Arts (AAS), Healthcare Administration (BS), Respiratory Therapy (AS), and Medical Specialties (AOS) programs in context of the number of graduates that seek further education rather than go on to vocational objectives;
 - b. An analysis of the why CCSD and its satellite location (SL460448), CA-Flagstaff, and CA-Phoenix report higher numbers of graduates excluded from the employment rate calculation due to further education than CEHE’s other locations; and
 - 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 student achievement outcomes requirements
9. CEHE did not demonstrate that the schools are able to justify the classification of each graduate as employed in a training related field (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation, Appendix VII-Guidelines for Employment Classification*). The TSRs for CCSD, SHC-Orem, SHC-Murray, and SHC-Idaho Falls raise questions about whether employment classifications for graduates reported as employed in field meet the tests set forth in *Appendix VII-Guidelines for Employment Classification*, particularly by being appropriate and reasonable based on the educational objectives of the program, CEHE did not demonstrate that the school’s policies and procedures for determining a classification of career advancement ensures that the graduate is **already employed in the field of study** at the time of graduation. The career advancement provision is only for graduates **employed in the field** prior to graduation – not eligible for obtaining an in-field job eventually. The specific questions and responses are outlined below.

CCSD (#M001073)

Respiratory Therapy (BS)

The TSR raises questions with regard to 4 of 24 graduates classified as employed in field. According to the school’s response, “██████████ was employed as a CNA prior to graduation, but documentation from the employer indicates that with a BS in Respiratory Therapy, she is qualified for career advancement.” The document supplied with the response is a copy of the school’s Graduate Employment Record. There is a typewritten “x” in the blank next to the phrase “Supported my ability to eligible or qualified for advancement.” The form is not signed by the graduate or by the employer. In fact, in the space titled “Supervisor Name,” the form is completed with a typewritten “N/A.” The lack of appropriate documentation of career advancement notwithstanding, the Commission does not agree that employment as a Certified Nursing Assistant can be considered “already employed **in the field of study** at the time of graduation” for a graduate from a **baccalaureate degree** program in

Respiratory Therapy. The career advancement provision is only for graduates **employed in the field** prior to graduation – not eligible for an in-field job eventually.

With regard to the remaining three Respiratory Therapy (BS) graduates in question, the school's response indicates the following

██ were employed by the College to perform Respiratory Therapy duties. A majority of the Respiratory Therapy Bachelor's program is clinical in nature, and the job duties of these positions required that they demonstrate and operate the equipment in the lab, performing all of the functions of a Respiratory Therapist, including using and maintaining respiratory equipment and performing hands-on competency tests with students that required the extensive knowledge of proper technique, respiratory equipment usage and other hands-on course objectives that could only be performed by certified Respiratory Therapist.

Although the response includes a job description and skill by skill analysis, the Commission determined that being employed by the school to demonstrate the functions of respiratory therapy equipment in an instructional environment does not constitute employment in the field and the successful attainment of the vocational objectives of the program.

Medical Specialties (AOS)

The February 16, 2018 TSR raises questions with regard to 10 of 30 graduates classified as employed in field, but employed as Certified Nursing Assistants, Home Health Aids, and a Skilled Personal Assistant. According to the school's response,

These objectives and career outcomes have been part of this program for many years and ACCSC has reviewed these objectives and career outcomes for at least the past decade without ever raising concerns or findings. As a result of these numerous and repeated reviews and the absence of any findings or concerns, the college has, in good faith, listed these titles in its documentation After this visit, and the surprisingly "new" interpretation from ACCSC, the program objectives and career outcomes have been reviewed and a Program Map developed that aligns the skills in each career outcome with the skills taught in each course. The career outcomes for the program have been adjusted to match the job titles that represent a majority of the skills in the program. The three career outcomes are Medical Assistant, Medical Biller/Coder, and Pharmacy Technician. Additionally, any title, other than the three listed, requires a skill-by-skill analysis between the program map and the job skills to confirm a majority of the skills taught are being used on the job. The catalog has been updated, training with the Career Services departments was conducted and new audit criteria was implemented in the Compliance department for the quarterly audits to ensure only the new criteria are used for employment going forward.

The school supported this response with the following documentation: a program map, Career Services Training, an e-mail communicating the change in career outcomes, and an excerpt from a revised catalog with updated career outcomes. The Commission remains unpersuaded with regard to the vocational outcomes of the positions pharmacy technician and medical biller/coder. Please refer to the Commission's requirements regarding the review of the Medical Specialties (AOS) program as described below.

Healthcare Administration (BS)

The February 16, 2018 TSR questions whether the employment outcomes of 18 of the 20 students classified as employed in-field hold positions that align with the program objectives or the program name, Healthcare Administration. Examples provided in the TSR include an administrator whose job duties are to answer phones, create patient records, and cover the front desk; a Medical Support Assistant; a Director of Education; an Associate Dean of Healthcare at CCSD, and an Office Manager. In response, the school explained that the program was designed to be a combination of clinical and administrative skills in the healthcare field; however, the response also states that the purpose of the program is intended to be training for medical staff to become managers. In context of that purpose, the clinical courses do not appear to be germane to the vocational outcome of the program. In addition, the Commission is not persuaded that an administrative position with clerical responsibilities, or an educational administrative position at the school can be considered aligned with the program objectives. The school explained that the “office manager position in a healthcare organization is a perfect fit for healthcare administration.” In absence of details regarding the job responsibilities of an office manager, it is not clear how that employment outcome aligns with the program’s purpose to train medical staff to become managers. A description of graduate [REDACTED] responsibilities – issuing payments, bills, and creating patient records – appears to be more clerical than managerial in nature. The school’s response also indicates that the “Advanced Medical Support Assistant” positions are specific to the Veterans Administration, with significant responsibility for supervision of staff. Again, without a specific job description it is not clear how that position aligns with the objectives of the program. Ultimately, the Commission noted that the school has decided to teach-out the Healthcare Administration (BS) program and conduct of subsequent review of the viability of this program. The Commission confirmed that the school has filed a Programmatic Teach-Out Approval Form as required, and the last students are scheduled to graduate in July 2020. Therefore, the Commission will continue to monitor the school’s attentiveness to ensuring graduates achieve the objectives of the current program throughout the conclusion of the teach-out.

SHC-Orem (#B070582)

The February 16, 2018 TSR raises a question specifically in regards to the following three graduates of the Medical Specialties program that were employed as Certified Nursing Assistants: [REDACTED], [REDACTED], and [REDACTED]. The response provided by the school is verbatim the response provided by California College San Diego (see above). As previously indicated, the Commission remains unpersuaded with regard to the vocational outcomes of pharmacy technician and medical biller/coder. Please refer to the Commission’s requirements regarding the review of the Medical Specialties (AOS) program as set forth below.

SHC-Logan (#B070584)

The February 16, 2018 TSR raised questions with regard to two graduates of the Business Management & Accounting (AAS) program reported as “Employed in Field”: one employed at SHC-Logan as an event planner and one employed at a Hampton Inn as a Night Auditor. In response, the school stated:

The objectives for this program include building a strong foundation in accounting, marketing, insurance, finance, management and professional success providing the student with an integrated understanding of good business and economic concepts, the development of planning, decision making and other management functions.

The Commission noted that the catalog states that “[g]raduates are employed in entry-level positions as bookkeepers, clerical assistants, and personal property professionals. The response specifically addresses the alignment of the two positions in question:

The majority of the courses offered are accounting related. For these reasons, the college determined that [REDACTED] position as a Night Auditor was an in-field position. Additionally, the Event Planning and Management emphasis includes objectives centered on working with clients to establish goals, select appropriate sites, prepare publicity and marketing, manage food and beverage selections, produce a budget and negotiate contracts with employed graduates working as event planners for a variety of different types of organizations. For these reasons, and the rationale that providing assistance teaching business principals would be in line with the program objectives, the college determined that [REDACTED] role as an Event Coordinator/Business Teaching Assistant was an in field position. However, [REDACTED] has now obtained new employment, since leaving her previous position that we can document as a placement if that would be acceptable.

The response does not include a description of [REDACTED] responsibilities as a Night Auditor and how they align with a majority of the educational and training objectives of the program. With regard to [REDACTED] it is the Commission’s position that employment at the school “providing assistance teaching business principles” as a teaching assistant does not constitute employment in the field and the successful attainment of the vocational objectives of the program.

The school provided a new Graduate Employment Record for [REDACTED], which indicates she is employed as an accounting assistant. Although the job title appears to align more closely with the educational objectives of the Business Management & Accounting (AAS) program, the response did not include a description of the responsibilities of her position that would show how they align with a majority of the educational and training objectives of the program.

The February 16, 2018 TSR raised a question with regard to a graduate of the Business Administration (BS) reported as “Employed in Field” as a Cracker Packaging Operator at Pepperidge Farm. In response, the school stated:

The objectives for this program include the preparation of graduates for a variety of responsible managerial positions in both domestic and international firms, providing a foundation in accounting, sales and marketing, HR management, banking, finance and operations management. Pairing these objectives with the college’s understanding of the ACCSC standard for career advancement at the time of the submission of the 2016 employment documents, this graduate’s employment was determined to be in field because the employer required all of their employees that were interested in advancement into managerial positions to acquire a BS degree. Additionally, the college had also received the signed career advancement attestation by the employer on the Graduate Employment Record (GER). Since the time of submission of these documentation the guidance provided to the college has been reviewed and updated so that potentially unclear employment documentation situations such as this will not occur by providing training regarding Career Advancement...

The response does not describe the school’s policies and procedures for determining a classification of career advancement ensures that the graduate is already employed **in the field of study** at the time

of graduation. The career advancement provision is only for graduates **employed in the field** prior to graduation – not eligible for an in-field job eventually.

The TSR raised questions about five graduates of the Medical Specialties (AOS) program that were employed as Certified Nursing Assistants (3), Night Staff, and a Donor Processor. The school provided the same response already excerpted from the CCSD response. As previously indicated, the Commission remains unpersuaded with regard to the vocational outcomes of pharmacy technician and medical biller/coder. Please refer to the Commission’s requirements regarding the review of the Medical Specialties (AOS) program as explained in Item #14 of this letter.

SHC-Idaho Falls (#M072351)

The February 16, 2018 TSR raises a question with regard to two graduates of the Medical Specialties (AOS) programs that were reported as “Employed in Field” in positions that do not appear to align with the majority of the educational and training objectives of the program: one as a Medical Receptionist/Assistant, and one in Home Health Care. The school provided the same response already excerpted from the CCSD response. As previously indicated, the Commission remains unpersuaded with regard to the vocational outcomes of pharmacy technician and medical biller/coder. Please refer to the Commission’s requirements regarding the review of the Medical Specialties (AOS) program as explained in Item #14 of this letter.

Overall, the Commission found that the schools have not shown that in all cases there is an effective process for making determinations regarding employment classifications that ensure that the school is able to justify the classification of each graduate as “Employed in Field,” using these guidelines:

- The employment classification is appropriate and reasonable based on the educational objectives of the program.
- The employment is for a reasonable period of time, is based on program objectives, and can be considered sustainable (e.g., not a single day of employment).
- The employment is directly related to the program from which the individual graduated, aligns with a majority of the educational and training objectives of the program, and is a paid position.

Based on the foregoing, the Commission directs the school to submit the following:

- a. A copy of the school’s policies and protocols in regard to the guidelines, including the school’s definition of reasonable time period, sustainability, and relatedness;
- b. For each program, a copy of the rubric used by the school to determine that an employment classification is appropriate and reasonable based on the educational objectives of the program;
- c. As part of the school’s response to Item #15 below, the Commission will review employment documentation that will show the extent to which the schools adhere to the policies and procedures regarding employment classification; and
- d. 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.

10. CEHE did not demonstrate that employment classifications are verified by the school through documentation that complies with the guidelines set forth in *Appendix VII of the Substantive Standards, Standards of Accreditation*.

CCSD (#M001073)

The February 16, 2018 TSR raises a question with regard to whether the school documented diligent efforts to obtain written documentation, and whether verbal verification was conducted with *both* the graduate and the employer as required. In response, the school indicated that “[a]s of December 2016, the campus established an internal policy to disallow verbal verifications completely.” The response includes a blank copy of the school’s form (Graduation Employment Record) showing that the information regarding verbal verification has been removed. The blank form does not, however, show implementation of the new policy and therefore the school must provide a sample of employment records for recent graduates to show that the school in fact secures written documentation in accordance with the school’s policy and accrediting standards.

In addition, the February 16, 2018 TSR indicates that the school did not document that in all cases employment classifications are supported as “career advancement” (as defined by ACCSC for the purposes of reporting employment rates) for students that were employed prior to entering the program or obtained employment prior to graduating. The school acknowledged that there is insufficient documentation to support the employment classification of ██████████ as “career advancement,” but asserted that ██████████ “signature on an exit interview form confirms that she was employed in field while in school, and that her degree qualified her for employment growth within her organization.” The school also explained that ██████████ signed Graduate Employment Record indicates that his degree (although the degree earned was not identified) not only allowed him to maintain his current employment, but would also allow him further advancement opportunities at his place of employment. The response, however, does not include copies of the Graduation Employment Records for either ██████████ or ██████████ to demonstrate the accuracy of the school’s statements.

The Commission took note of the following statement from the school’s response, “[t]he college does not understand why having a job in field and continuing your education to increase opportunities is a problem especially in a degree program.” The Commission finds it important to emphasize that continuing education while employed is not “an issue” as evidenced by the mere fact that ACCSC has an allowance for this very classification in its student achievement reporting scheme. Career advancement is a fundamental and recognized aspect of ACCSC’s assessment regarding to what a school meets its mission (*Section I (B)(1)(d), Rules of Process and Procedure, Standards of Accreditation*). At issue for the Commission is not whether career advancement is an acceptable outcome. Rather it is the school’s lack of documentation justifying the classification of graduates as employed **in the field** as set forth in the *Guidelines for Employment Classification* – especially in a degree program which requires more time and money – under the career advancement definition. The response indicates that the school has conducted training on how to document career advancement, and provided notes from the Career Services Weekly Call on July 28, 2016. The Commission noted that the school requires “[t]he graduate MUST initial one of the two career advancement boxes and the GER has to be signed or career advancement must be verified through email.” The Commission is interested in ensuring that the school adheres to this process.

CA-Flagstaff (#M070742)

The February 16, 2018 TSR raises a question with regard to whether the school is documenting that employment positions fulfilled the career advancement objective for students that were employed prior to entering the program or obtained employment prior to graduating. The February 16, 2018 TSR notes that of the 32 students classified as employed in-field on the Graduation and Employment Chart for the Medical Specialties (AOS) program, 2 students obtained their position prior to starting the program and 15 obtained their position significantly prior to graduation. The February 16, 2018 TSR notes that the school's employment verification form includes a preprinted statement indicating that the employment allowed graduates to maintain their position or supported their ability to be eligible for advancement; however, the information provided in the record raised questions as to whether current position demonstrates that the student is already employed **in the field of study** at the time of graduation. The career advancement provision is only for graduates **employed in the field** prior to graduation – not eligible for an in-field job eventually.

In response, the school included a copy of *Appendix VII* of the *Standards of Accreditation*, and states that “[t]he Standard does not provide any details or require additional documentation to demonstrate **how** the training supported a student's ability to be eligible for advancement.” The Commission recognizes that the requirement to document career advancement does not require an explanation of how the training support the student's ability to be eligible for advancement; however, the requirement to ***justify*** each employment classification would require that the school show how the **current** employment aligns with the program objectives, not the job the graduate is eligible for. The response, however, does not include employment records for graduates classified as “employed in field” through career advancement to show that the school's records comply with the requirements set forth in *Appendix VII*.

CA-Phoenix (#M070743)

The February 16, 2018 TSR raises a question with regard to whether the school documents that employment positions classified as “career advancement” fulfill ACCSC's definition in this regard. The school's employment verification form includes a preprinted statement indicating that the employment allowed graduates to maintain their position or supported their ability to be eligible for advancement. However, the information provided in the record does not make clear the connection between the training and fulfillment of the career advancement objective. In response, the school included a copy of *Appendix VII* of the *Standards of Accreditation*, and states that “[t]he Standard does not provide any details or require additional documentation to demonstrate **how** the training supported a student's ability to be eligible for advancement.” The response does not include employment records for graduates classified as “employed in field” through career advancement to show that the school's records comply with the requirements set forth in *Appendix VII*. In absence of documentation, the school has not shown that the school maintains verifiable records of initial employment.

SHC-Orem (#B070582)

The TSR raises a question with regard to documentation of cases where the school relied on verbal verification of employment classifications. The school did not provide sufficient documentation that diligent efforts had first been made to secure written documentation. In addition, the school only provided verbal verification from the graduate ***or*** the employer, rather than ***both*** the graduate and the employer as required. In response, the school indicated that “[t]he campus has also determined that

they will no longer allow verbal verifications.” The response states, “[a]s proof, the college has provided 2017 annual report placement information for Healthcare Administration BS, Business Management & Accounting AAS and Medical Specialties AOS programs showing the type of documentation gathered for those placements...” Although the school provided a description of documentation for each graduate, the Commission is interested in reviewing a sample of employment records for recent graduates to determine that the school is securing written documentation in accordance with the school’s policy and accrediting standards.

In addition, the TSR noted the number of graduates who were employed in-field prior to graduation and in some cases, prior to entering the program: of the 90 graduates classified as employed in field, 26 either secured a job prior to entering the school or prior to graduating from the program. Although the school has students check a box on the employment verification form indicating that the employment allowed them to maintain their position or supported their ability to be eligible for advancement, it was not clear the graduates are working in the field prior to graduation. The career advancement provision is only for graduates employed in the field prior to graduation – not eligible for obtaining an in-field job eventually..

In response, the school includes a copy of *Appendix VII* of the *Standards of Accreditation*, and states that “[t]he Standard does not provide any details or require additional documentation to demonstrate how the training supported a student’s ability to be eligible for advancement.” The Commission recognizes that the requirement to document career advancement does not require an explanation of how the training support the student’s ability to be eligible for advancement; however, the requirement to *justify* each employment classification would require that the school show how the employment aligns with the program objectives. The response does not include employment records for graduates classified as “employed in field” through career advancement to show that the graduates are working in the field. The career advancement provision is only for graduates employed in the field prior to graduation – not eligible for obtaining an in-field job eventually.

SHC-Logan (#B070584)

The TSR raises questions with regard to verbal verification of employment records and documentation of self-employment. In response, SHC-Logan stated “[t]he documentation reviewed and discussed during the visit was gathered prior to 2016. The campuses [*sic*] understanding of verbal verification and diligent efforts to secure written documentation at that time was in error.” The school subsequently corrected the error and

[s]ince that time, the college has minimized the use of verbal verifications, obtaining most verifications in writing (including email) from the graduate directly, through either DocuSign or using a paper Graduate Employment Record. As proof of this, the college has documented all placements that have been reported in the largest program, Medical Specialties AOS and listed the type of documentation gathered for those placements...

Although the school provided a description of documentation for each graduate, the Commission is interested in reviewing a sample of employment records for recent graduates to determine that the school is securing written documentation in accordance with the school’s policy and accrediting standards.

In addition, the TSR noted two graduates of the Medical Specialties program who were employed as Certified Nursing Assistants more than a year prior to graduating and were classified as “employed in field” due to fulfillment of career advancement objectives. Although the school has students check a

box on the employment verification form indicating that the employment allowed them to maintain their position or supported their ability to be eligible for advancement, a Certified Nursing Assistant position is not considered employment in the field for the Medical Specialties degree program. The career advancement provision is only for graduates **employed in the field** prior to graduation – not eligible for obtaining an in-field job eventually.

In response, the school includes a copy of *Appendix VII* of the *Standards of Accreditation*, and states that “[t]he Standard does not provide any details or require additional documentation to demonstrate **how** the training supported a student’s ability to be eligible for advancement.” The Commission recognizes that the requirement to document career advancement does not require an explanation of how the training support the student’s ability to be eligible for advancement; however, the requirement to **justify** each employment classification would require that the school show how the employment aligns with the program objectives. The response does not include employment records for graduates classified as “employed in field” through career advancement to show that the school’s records comply with the requirements set forth in *Appendix VII*.

SHC-Idaho Falls (#B072351)

The TSR raises questions about whether the school demonstrated diligent efforts to obtain written documentation from graduates and employers, and whether the school was documenting verbal verification with both the graduate and the employer. In response, the school “...agrees that its diligent efforts to secure written documentation were insufficient for the three placements in question. Prior to 2016, the college was not clear on the requirements to appropriately document diligent efforts.” As a result of this training, SHC-Idaho Falls campus leadership implemented a “no verbal verification” policy regarding employment verifications. Since that time, all employment verifications are obtained in writing (including email) from the graduate or employer directly. As evidence of this change in process, below are all placements reported in the 2017 Annual Report in the largest program, Medical Specialties AOS...” Although the school provided a description of documentation for each graduate, the Commission is interested in reviewing a sample of employment records for recent graduates to determine that the school is securing written documentation in accordance with the school’s policy and accrediting standards.

The Commission took note that the responses for CA-Flagstaff, CA-Phoenix, SHC-Orem, and SHC-Logan refer to the July 22, 2016 ACCSC Webinar. The responses state, “[a]dditionally, during the webinar it was stated that third party verification is done “to assess whether the school’s documentation is reliable.” Third party verification did not find the documentation unclear on these records, as submitted in the SER.” The Commission advises CEHE that the purpose of the third-party verifier is to confirm the accuracy of the employment data, and not to make a judgement regarding whether the employment classification fulfills the educational objective of the program.

Overall, the Commission found that the schools’ responses did not provide sufficient information regarding the process of documenting employment information to show compliance with accrediting standards. Accordingly, the Commission directs CEHE to submit the following:

- a. A narrative regarding the policies and procedures for maintaining employment records for CEHE schools. The response should answer the following:

- i. Is there one standard policy implemented at all schools or does each campus implement a unique policy?
 - ii. What is the process for reviewing and updating policies and procedures for each campus?
 - iii. Who are the individuals responsible for developing the policies and procedures?
 - iv. Has every ACCSC-accredited school in the CEHE system adopted a policy of not accepting verbal verifications?
- b. A copy of the policies and procedures described above (if there is one policy for all schools, submit one copy of the policy or if any of the schools under review implement unique policies, submit those policies and procedures separately);
- c. A list of the ten most recent graduates from each school in the CEHE system that were classified as employed in field using the following format:

Name Of School (ACCSC School Number)		
Graduate Name	Program	Graduation Date

- d. The employment record for each graduate listed above; and
- e. 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.
11. CEHE did not demonstrate that the schools adhere to the requirements set forth in *Section II (A)(11), Substantive Standards, Standards of Accreditation*, with regard to transfers of credit. The responses regarding official transcripts for formerly enrolled students raised questions about how the schools are documenting transfers of credit among CEHE-affiliated institutions. The following statement is from CCSD’s response to the February 16, 2018 TSR:

One of the benefits to our students is the flexibility they have to move from one program to another without losing credits or having to fill out transfer of credit paperwork... Students feel free to make these changes because the campus makes it easy to do. This is a benefit, not a problem.

As a group of schools, the college is used to having all the information shared on the transcript, and it makes sense that with a consortium agreement that allows students the flexibility to move from one location to another and seamlessly move credits without the time and cost of having them evaluated, transcripts contain the information for all programs and location in one place.

CA-Phoenix provided a similar response with regard to transfers of credits among affiliated schools:

Because the college has an appropriate consortium agreement with the colleges owned and operated by CEHE students are afforded the freedom and the flexibility to move from one CEHE college location to another relatively seamlessly. This is a BENEFIT to our students and allows them to transfer credits without the time and cost of having them evaluated. Accordingly, CEHE’s student information system has the ability to track any transfers into or out of the campus from other CEHE colleges.

The Commission noted that both schools referred to a consortium agreement, and therefore reviewed the information provided in each school's Self-Evaluation Report ("SER"), dated January 30, 2017. CCSD's response to Section II (A)(9)(a) of the SER is as follows:

The College has a consortium with our affiliated schools: California College San Diego, CollegeAmerica, Stevens-Henager College, and Independence University to accept credits from their associated training programs. Additionally, students enrolled residentially at a campus who wish to complete a course within their program online may do so through Independence University, based on course availability. This Consortium agreement has been approved by ACCSC.

CA-Phoenix provided a consistent response to Section II (A)(9)(a) of the SER as follows:

The College has a consortium with our affiliated schools: California College San Diego, CollegeAmerica, Stevens-Henager College, and Independence University to accept credits from their associated training programs. Additionally, students enrolled residentially at a campus who wish to complete a course within their program online may do so through Independence University, based on course availability. This Consortium agreement has been approved by ACCSC.

In each case, the SER includes a copy of a consortium agreement signed and dated by CEHE personnel on April 25, 2014; however, the ACCSC approval letter included in the SER is dated nearly ten years prior, on August 11, 2004. The approval letter indicates that it is in regard to "Consortium Agreement for Online Instruction between SHC-Murray (#B070583) and other ACCSCT-accredited institutions." It appears that ACCSC's approval of a consortium agreement is limited to online instruction offered by the designated campus. It is not clear that ACCSC has approved a consortium agreement for residential instruction among the entire group of CEHE schools.

Regardless of whether students are completing educational units at affiliated schools via consortia agreements, or transfers of credit, the Commission expects the process to be documented. As the school implies, this may not require additional "paperwork" on the part of the student, but the school's records must document how educational units are accumulated and credentials conferred. The schools' responses do not provide sufficient information and documentation showing that there are formal policies and procedures in place and followed.

Based on the foregoing, the Commission directs CEHE to submit the following:

- a. Documentation of the current consortia agreements among the entire system of CEHE-affiliated schools;
- b. A description of how the schools document transfers of credits among the affiliated schools;
- c. A copy of the schools' established appropriate criteria (in areas such as comparability, applicability, source, and age of the previously earned credit; academic preparedness of the student at the time of credit transfer; grade earned for the credit to be transferred; etc.) for determining whether to accept credit earned at other institutions for transfer;
- d. For each CEHE affiliated school, a list of the five most recently enrolled students for whom the school transferred in credit, from either another institution or an affiliated institution;
- e. For each CEHE-affiliated school, documentation to show how the school applied the established criteria for the students listed in (d.) above; and

- f. A current transcript for each student listed in (d.) above showing how transfers of credit are represented on each student's permanent educational record.
12. CEHE did not demonstrate that the schools maintain an accurate transcript for all students (*Section VI (B)(2), Substantive Standards, Standards of Accreditation*). At issue is whether the each school maintains an official transcript for each formerly enrolled student that accurately represents the educational process.

CA-Phoenix (#B070743)

According to the February 16, 2018 TSR, it appears that each individual school is able to access a student's record at all CEHE schools and compile the data into a transcript document. At issue is the way in which that transcript represents the student's educational process. The transcript does not differentiate the locations at which credits were awarded, making it appear that a student attended one location for an entire program, which does not provide an accurate depiction of transfers between campuses. As a result, transcripts make it appear that students attended programs that the individual school is not approved to offer. The TSR lists the following examples:

- Student [REDACTED] (CA-Phoenix): This student's transcript indicates that the student enrolled in the Medical Specialties (AOS) program, graduated, and enrolled in the Business Administration with an Emphasis in Human Resources (BS) program, which is not offered at CA-Phoenix.
- Student [REDACTED] (CA-Phoenix): This student's transcript indicates that the student graduated the Medical Specialties (AOS) program and later entered a Health Science (BS) program, which is not available at CA-Phoenix.
- Student [REDACTED] (CA-Phoenix): This student's three-page transcript indicates that the student enrolled in a Business Management & Accounting (AS) program, transferred to a Computer Technology & Networking (AS) program, and transferred back into a Business Management & Accounting (AS) program. At the top of page one, the school is identified as Stevens Henager College Online. Page two of the transcript lists courses taken as part of the Business Management & Accounting (AS) program, then a transfer to a Graphic Arts (AS) program and another transfer to the Business Management & Accounting (AS) program. At the top of page two, the school is identified as CollegeAmerica Phoenix Campus; however, this location does not have a Graphic Arts program. The last page of the student's transcript shows the student completed the Business (AS) program and the school is identified as IU-Salt Lake City at the top of the page.

According to the school's response,

The student's transcripts contains the information for all programs and locations in one place. Had the visiting team asked for a transcript for a student's specific program - the college could have easily provided this document. When printing transcripts, the CampusVue student database allows the user to select either a specific enrollment for a student or, by default, a transcript that includes all programs and all enrollments that the student had. During the time of the visit, our Registrar inadvertently printed transcripts that included all enrollments for each student.

As an initial matter, the Commission pointed to the school's own response to illustrate the issue at hand. The school appears to blame the on-site evaluation team for not requesting a different kind of

transcript when the school admits that it was the registrar that “inadvertently” printed the wrong transcript. The issue being, it is not clear from the explanation provided, that the school has defined an official transcript, as apparently records maybe printed in various forms and as such there is confusion regarding student transcripts. The purpose of a transcript is to serve as the official record of each student’s education and must accurately reflect how and where the educational units were completed – regardless of whether students completed courses at the issuing institution, through other institutions via a consortium agreement, or were transferred in from other schools, including affiliated schools. With the response, the school supplied two transcripts for “only Phoenix campus enrollments.” The Commission found that a sample of two transcripts for students that appear to have completed the entirety of the program at one institution does not address the issue of how transcripts for transfer students accurately reflect the educational process and the school’s administrative support for that process.

CCSD (#M001073)

According to the February 16, 2018 TSR, it appears that an individual school is able to access a student’s record for all CEHE schools and compile it into one transcript document labeled with that school’s name, which does not accurately reflect the student’s educational experience. According to the school’s response,

During the time of the visit, our Registrar inadvertently printed transcripts that included all enrollments for each student. The College was not aware that the visiting team had an issue (finding) with the way student transcripts were printed. As a group of schools, the college is used to having all the information shared on the transcript, and it makes sense that with a consortium agreement that allows students the flexibility to move from one location to another and seamlessly move credits without the time and cost of having them evaluated, transcripts contain the information for all programs and location in one place. Had the visiting team asked for a transcript specific to a program the college could have easily provided this document.

As an initial matter, the Commission pointed to the school’s own response to illustrate the issue at hand. The school appears to blame the on-site evaluation team for not requesting a different kind of transcript when the school admits that it was the registrar that “inadvertently” printed the wrong transcript. The issue being, it is not clear from the explanation provided, that the school has defined an official transcript, as apparently records maybe printed in various forms and as such there is confusion regarding student transcripts. The purpose of a transcript is to serve as the official record of each student’s education and must accurately reflect how and where the educational units were completed – regardless of whether students completed courses at the issuing institution, through other institutions via a consortium agreement, or were transferred in from other schools, including affiliated schools. With the response, the school supplied two transcripts for “only Phoenix campus enrollments.” The Commission found that a sample of two transcripts for students that appear to have completed the entirety of the program at one institution does not address the issue of how transcripts for transfer students accurately reflect the educational process and the school’s administrative support for that process. The response includes transcripts submitted in response to Team Finding #5 of the February 16, 2018 TSR, so the Commission reviewed these transcripts for compliance with accrediting standards. The following are the Commission’s findings with regards to the transcripts submitted by CCSD, CA-Flagstaff, CA-Phoenix, and SHC-Logan.

Student ID: [REDACTED]

- The first page of the transcript indicates that the student started in the Respiratory Therapy (BS) program on September 1, 2008. The current status is identified as “Transfer to Another Program,” and the “LDA” is listed as October 21, 2010. Appearing first on the transcript is a list of 30 credits identified as “associated courses.” Although the transcript (page 1 of 5) does not identify the origin of those credits, the Commission found those courses appear as earned credits at the school on subsequent pages of the transcript. For example, Clinical Experience III, one of the associated credits listed on page 1, is listed on page 3 of 5 as earned two years later, during the October 2010 term. With the October 2010 term, it is listed twice with grades of F and A, respectively. Five of the courses were completed 28 months later during the January 2011 term. Therefore, it appears the “associated courses” were acquired at the school and it is unclear why those courses are listed as “associated courses” on the transcript before being listed as earned.
- After the list of “associated courses,” is a list of 12 credits identified as having been transferred in from Grossmont College in El Cajon, California, all general education courses, one upper level. The transcript also lists one 4-credit course transferred in from San Diego Community College.
- At the bottom of page 2 of 5, the program is listed as Respiratory Therapy (AS) program, starting October 25, 2010, so it appears the student transferred out of the baccalaureate degree and into the associate degree. The current status is listed as “Graduate,” with an LDA of December 17, 2010. The first listing in this section is a list of 92 credits identified as “associated courses.” Although the transcript (page 3 of 5) does not identify the origin of those credits, the Commission noted that these courses are listed as “earned” during the September 2008, January 2009, April 2009, and September 2009 terms on pages 1-2.
- At the bottom of page 3 of 5, the program is listed as Respiratory Therapy (BS) starting January 3, 2011, so it appears that the student went back into the baccalaureate degree program after graduating from the Respiratory Therapy (AS) program. The status for this program is listed as “Graduate” with an LDA of July 15, 2011. This section of the transcript starts with a list of the 30 courses identified as “associated courses.” Although the transcript (page 4 of 5) does not identify the origin of those credits, the Commission found those courses appear on previous pages of the transcript. The Commission noted that these courses are listed as “earned” during the September 2008, January 2009, April 2009, and September 2009 terms on pages 1-2.

Overall, the Commission found that the transcripts do not demonstrate the sequential movement through the programs. There is no definition of “associated courses,” or clarity as to when courses are taken within the established five-month terms, as courses may be listed as having been awarded an “F” and an “A” in the same term. Courses appear on the transcripts multiple times and it is unclear that courses were completed in the sequence as required.

Based on the foregoing, CEHE has not demonstrated that each school maintains an official transcript for all formerly enrolled students that accurately represents the educational process. Accordingly, the Commission directs CEHE to submit the following:

- a. A description of each school’s official transcript and how it is produced;
- b. A copy of the policies and procedures for issuing official transcripts to formerly enrolled students;
- c. A list of the five most recent graduates from each campus;

- d. A list of the five most recent withdrawals or transfers to other institutions (including students that transfer to other CEHE-affiliated institutions);
 - e. A copy of the official transcript for each formerly enrolled student listed above; and
 - f. A copy of the school’s catalog showing the scope and sequence of the programs.
13. CEHE did not demonstrate that the number of credit hours attempted in each 16-week term conforms with standard academic practice and support achievement of program objectives (*Section II (A)(3)(e)(ii) and Appendix III, Substantive Standards, Standards of Accreditation*). In review of the transcripts submitted in the responses for CCSD, CA-Flagstaff, CA-Phoenix, and SHC-Logan, the Commission noted students attempting a number of credits per 16-week term that does not appear to align with generally accepted practices regarding academic load. Attempting 21 quarter credits in a 16-week term is a minimum of 200 didactic hours and 400 hours of outside work, meaning that students are engaged in schoolwork a minimum of 37.5 hours per week. However, there are several students who appear to have an excessive academic load far exceeding that number of credit hours. The Commission noted the following examples from transcripts to be representative of excessive academic loads.

Student ID#	Quarter Credits Attempted	Quarter Credits Earned
██████████	30.5 28	30.5 28
██████████	23.5 22 26.5 29.5 24	15.5 3 23 21.5 24
██████████	23.5 31 24.5	19.5 27 20.5
██████████	22.5 26.5 23 23	22.5 26.5 19 19
██████████	22.5 32 40	22.5 32 40
██████████	27.5 27 28.5 28	27.5 27 25.5 28
██████████	32 22	32 22

The Commission noted that attempting 30 quarter credits in a 16-week term requires the student to engage in schoolwork a minimum of 54 hours a week, and attempting 40 quarter credits in a 16-week term requires the student to engage in a minimum of 75 hours of schoolwork each week. The Commission is not persuaded that these extraordinary requirements of student engagement over the course of a 16-week term is feasible. Given the number of students engaged in these excessive loads and in the context of the student achievement challenges that students face as described by the school,

the Commission questions how so many students can accomplish this feat particularly or why it is allowed.

Based on the foregoing, the Commission found that the school's delivery of credit hours does not appear to align with standard academic practice, nor does it appear to provide a basis for student success. Accordingly, the school is directed to submit the following:

- a. An explanation of the school's reasoning for the extraordinary academic loads noted above;
 - b. An assessment of how the school's approach to scheduling credit hours impacts student graduation rates;
 - c. A description of any changes the school intends to make in order to provide for more reasonable academic loads; and
 - d. 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.
14. CEHE did not demonstrate that the Medical Specialties (AOS) program is an appropriate program with regard to length and objectives (*Section II (A)(3)(c)(iii), Substantive Standards, Standards of Accreditation*). The February 16, 2018 TSRs for CCSD, CA-Flagstaff, CA-Phoenix, SHC-West Haven, SHC-Murray, and SHC-Logan all raised questions with regard to the Medical Specialties (AOS) program as follows:

CCSD (#M001073)

As stated in the TSR:

According to the occupation specialist for the Medical Specialties (AOS), the program combines many areas that a student could complete by going through much shorter, singular programs, such as Phlebotomy or Medical Assisting. The occupation specialist also questioned why the program costs in excess of \$42,000 and students do not obtain certifications. The catalog indicates that "objectives of the program include preparing students for possible certification or licensing in various medical specialties; however, students should be aware that in most cases additional training, cost and/or clinical experience may be required to sit for certain certification or licensure exams." In review of the graduate employment documentation, it appears that the majority of students are employed as Medical Assistants; CNA's, and Home Health Aids. Because these outcomes can generally be met in a much shorter timeframe, it is not clear that the program length aligns with the program objectives. It is further unclear if the program can be referred to as "Medical Specialties" when graduates of the program do not specialize in any specific area and instead, appear to have general knowledge in a variety of low-level medical fields.

In response, the school claimed that the advantage of the Medical Specialties degree over the shorter, singular programs is that it makes the graduate "more marketable." The response does not contain any evidence or documentation to support this assertion. The Commission noted that, while employment rates meet ACCSC's benchmarks, those rates are below the average (mean) aggregated employment data collected in ACCSC's Annual Report or 78%. The employment rate reported for the Medical Specialties (AOS) program is 70% with the 2017 Annual Report, 62% for 2016, 68% for 2015, and 68% for 2014. Given the Commission's concerns below pertaining to the employment classifications for Medical Specialties graduates and because the reported employment rates have been below average and only at or below benchmark the response does not support a claim that this degree makes

graduates “more marketable.” The response includes excerpted comments from Program Advisory Committee members who appear to support the graduates learning a variety of skills. However, the Commission noted that the comments do not imply that acquiring a multiplicity of skills is required for the vocational outcomes of the program. The members did comment that the externship of 160 hours might not provide sufficient practical application of skills in an occupational environment.

The Commission took note of the statement in the catalog which indicates that “in most cases additional training, cost and/or clinical experience may be required to sit for certain certification or licensure exams.” The Commission noted that the catalog does not disclose how much and what type of additional training, cost, and/or clinical experience may be required, and whether those certification or licensure examinations are required to fulfill the educational objectives of the program.

According to the response, the career outcomes for the program have been adjusted to match the job titles that represent a majority of the skills of the program. The career outcomes are Medical Assistant, Medical Biller/Coder, and Pharmacy Technician. Additionally, any title, other than the three listed, requires a skill-by-skill analysis between the program map and the job skills to confirm a majority of the skills taught are being used on the job. The response does not include samples of recent employment records to show that the new criteria have been implemented.

CA-Flagstaff (#M070742)

As stated in the TSR:

It appears that the Medical Specialties program combines many skill areas that a student could acquire by completing much shorter programs in the individual skill areas, such as Phlebotomy or Medical Assisting. In review of the graduate employment documentation, many students are employed as Caregivers; Phlebotomists; Medical Assistants; and Residential Home Managers. Because each of these vocational outcomes can be achieved in a much shorter timeframe - and in some cases without any post-secondary education - it is not clear that the program length aligns with the program objectives.

According to the response, the career outcomes for the program have been adjusted to match the job titles that represent a majority of the skills of the program. The career outcomes are Medical Assistant, Medical Biller/Coder, and Pharmacy Technician. Additionally, any title, other than the three listed, requires a skill-by-skill analysis between the program map and the job skills to confirm a majority of the skills taught are being used on the job. The response does not include samples of recent employment records to show that the new criteria have been implemented.

The Commission took note of the statement in the catalog that indicates that “in most cases additional training, cost and/or clinical experience may be required to sit for certain certification or licensure exams.” The Commission noted that the catalog does not disclose how much and what type of additional training, cost, and/or clinical experience may be required, and whether those certification or licensure examinations are required to fulfill the educational objectives of the program.

CA-Phoenix (#B070743)

As stated in the TSR:

It appears that the Medical Specialties program combines many skill areas that a student could acquire by completing much shorter programs in the individual skill areas, such as Phlebotomy or Medical Assisting. In review of the graduate employment documentation, many students are employed as Caregivers; Phlebotomists; Medical Assistants; CNA's, and Home Health Aids. Because each of these outcomes can be achieved in a much shorter timeframe, it is not clear that the program length aligns with the program objectives.

The school's response to this finding is the same as the response to the CA-Flagstaff response, and the Commission's findings in this regard are the same as noted above.

SHC-West Haven (#M070581)

As stated in the TSR:

The on-site evaluation team noted graduates reported as "employed in field" on Graduation & Employment Charts submitted with the 2016 Annual Report were reported to be employed in positions such as Patient Service Representative, Phlebotomy Technician, and Certified Nursing Assistant. The school did not demonstrate how those vocational outcomes are appropriate and reasonable for graduates of an associate's degree program. Even if the published objectives of the Medical Specialties (AOS) program are accurate in that an individual with a "specialties" associate degree would be able to perform the generalized responsibilities of nursing assistants, the team questions if those objectives are appropriate in that the objectives align with the title, length, or credential of the Medical Specialties (AOS) program.

The school's response to this finding is the same as the response to the CA-Flagstaff response, and the Commission's findings in this regard are the same as noted above.

SHC-Murray (#B070583)

As stated in the TSR:

The on-site evaluation team noted that 8 of the 58 graduates reported as "employed in field" on Graduation & Employment Charts submitted with the 2016 Annual Report were reported to be employed in positions such as Patient Service Representative, Phlebotomy Technician, and Certified Nursing Assistant. The school did not demonstrate how those employment classifications are appropriate and reasonable outcomes for graduates of an associate's degree program. Even if the published objectives of the Medical Specialties (AOS) program are accurate in that an individual with a "specialties" associate degree would be able to perform the generalized responsibilities of nursing assistants, the team questions if those objectives are appropriate in that the objectives align with the title, length, or credential of the Medical Specialties (AOS) program.

The school's response to this finding is the same as the response to the CA-Flagstaff response, and the Commission's findings in this regard are the same as noted above.

SHC-Logan (#B070584)

As stated in the TSR:

The Medical Specialties program objectives refer to many areas that a student could complete by going through much shorter, individual programs, such as a Medical Assisting or Certified Nursing Assistant program. Based on the employment records from the 2016 Annual report where several graduates were classified as employed-in-field as Certified Nursing Assistants well before graduation, it is unclear to the team that completing a two year degree is appropriate to meet objectives that could be attained through programs that are significantly shorter in length.

The school's response to this finding is the same as the response to the CA-Flagstaff response, and the Commission's findings in this regard are the same as noted above.

Based on the foregoing, the Commission found that CEHE has yet to show that the Medical Specialties (AOS) program is of the appropriate length and level to achieve the stated program outcomes. As noted in the TSRs, the program combines different skill areas that a student could acquire by completing shorter, singularly-focused programs, and yet the catalog indicates that "in most cases" students will have to complete additional training or get additional clinical experience to sit for certification or licensure exams. In addition, it appears that Medical Specialties is a misnomer, since the emphasis appears to be on acquiring a multiplicity of skills, rather than a specialization. Due to the extent of the questions regarding the this program, the Commission directs all CEHE schools to **cease enrollment in the Medical Specialties program** until such time as the school is able to convincingly demonstrate that this program has been redesigned with appropriate curriculum that aligns to the educational and employment objectives and provides reliable and justifiable pathways for student success. Absent such evidence, the Commission will discontinue the approve of the Medical Specialties program for all CEHE-affiliated institutions.

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

- a. A list of the campuses in the CEHE system that are currently offering the Medical Specialties (AOS) program and
- b. An attestation from the highest-ranking official at each campus as to the effective date that the campus ceased enrolling new students in the Medical Specialties (AOS) program.

If any of the schools listed in (a.) above intend to redesign this program, then in addition to the appropriate substantive change report, those campuses will need to submit the following:

- a. A detailed description of the program redesign;
- b. A justification with detailed external evidence and market-level support for why the school should be allowed to offer this program, the length of, and the program's objectives;
- c. An evidence-based independent third-party that study that shows how specifically the multiplicity of skills and the degree make graduates more marketable and successful in related fields (i.e., not in low level fields that would otherwise not require an associate-level degree – e.g., CNA and Phlebotomy Technician);
- d. An explanation as to the statement in the catalog "in most cases additional training, cost and/or clinical experience may be required to sit for certain certification or licensure exams," including a description of how much additional training, cost and/or clinical experience is required to sit for

each certification or licensure exam, and whether that certification/licensure is required for employment;

- e. A list of the five most recent graduates from the Medical Specialties (AOS) program that have been categorized as “employed in field” from each school and corresponding employment documentation for each; and
- f. 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.

If any of the school’s listed in (a.) above intend to discontinue offering the Medical Specialties program, please submit a Programmatic Teach-out Form.

15. CCSD did not demonstrate that the program name accurately aligns with program objectives for the Healthcare Administration (BS) Program (*Section II (A)(3)(c)(i), Substantive Standards, Standards of Accreditation*). The February 16, 2018 TSRs for CCSD (#M001073), CA-Phoenix (#B070743), and SHC-Idaho Falls (#B072351) raised questions with regard to the alignment of the curriculum for the Healthcare Administration (BS) program with the objectives the program name suggests. In response, California College of San Diego (#M001073) indicated that the campus has ceased enrollment in the program and is reviewing the modified version to determine if it is appropriate to start offering the program again. CA-Phoenix (#B070743) and SHC-Idaho Falls (#B072351) stated “[t]he college has ceased enrollment in this program until the program modification has been approved.” The Commission recognizes the school’s caution in ensuring the program modifications will be successful, and directs the other schools in the system with the Healthcare Administration (BS) program to adopt the same approach.

Based on the foregoing, the Commission directs CEHE to **cease enrolling students in the Healthcare Administration (BS) program**, until a further review of the efficacy of the revised program can be conducted, and to submit the following:

- a. A list of the campuses in the CEHE system that are currently offering the Healthcare Administration (BS) program; and
- b. An attestation from the highest-ranking official at each campus as to the effective date that the campus ceased enrolling new students in the Healthcare Administration (BS) program;

If any of the schools listed in (a.) above intend to redesign this program, then in addition to the appropriate substantive change report, those campuses will need to submit the following:

- a. A detailed description of the program redesign;
- b. A justification with detailed external evidence and market-level support for why the school should be allowed to offer this program, the length of, and the program’s objectives;
- c. A copy of the current assessment of the modifications made to the Healthcare Administration (BS) program and how the school has ensured that the program name accurately aligns with program objectives, including any external validation that the revised program as to local demand for training, local employment outlook, earning potential of graduates, and other factors that might affect the success of the program;
- d. 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.

If any of the school's listed in (a.) above intend to discontinue offering the Healthcare Administration (BS) program, please submit a Programmatic Teach-out Form.

16. CEHE did not demonstrate that instructional materials and equipment are sufficiently comprehensive and reflect current occupational knowledge and practice (*Section II (A)(5)(a), Substantive Standards, Standards of Accreditation*).

According to the February 16, 2018 TSR for CCSD, the Occupation Specialist for the Computer Technology and Networking; Computer Programming; and Computer Science programs found that the school does not have the current equipment necessary for training. Specifically, the school appears to be operating with equipment that is more than 15 years old, which is not considered current for the technology field. According to the response,

The College disagrees with this assessment. The College does have current equipment along with older equipment. The College does teach and use Windows 10. The College does teach Cisco 10S and does include instruction on CAT 6/6A/7 and fiber optics.

The College believes that the Occupational Specialist saw the hardware lab that contained lots of old equipment used for demonstration and assumed that was the only equipment the students used. When in fact the College offers all of the above mentioned equipment and software.

The response indicates that students are provided a laptop for the duration of the program and describes the specifications of the laptops, as well as the software that is included with each laptop. In addition, the response describes "Test Out" software that is used by CCSD as "supplemental course material." Apparently students use this software for study material, certification test prep, and a virtualized lab environment. With regard to the operating systems, the school stated that Windows 10 is one of the operating systems covered in the virtualized lab environments. In addition, the response indicates that Cisco IOS 12s is "presented extensively in the IT simulation environment" and that

Additional hands-on is provided using the equipment in classroom. The physical hardware provided in the classroom is to support the Test-Out online virtualized labs utilized by CCSD. Hardware older than what is used in the Test-Out virtualized labs is used in classroom strictly for exhibit and demonstration purposes.

With regard to the inclusion of fiber optics, the response stated

...fiber optics is reviewed in detail through course material, as well, but is not terminated in class, as it is not a requirement to terminate fiber optics, only to identify fiber optic cable and the connectors on current industry standard CompTIA Network+ N10-006 certification

The Commission found that although the school's response indicates how the curriculum incorporates Windows 10, Cisco IOS 12, and fiber optics, the response does not make clear how the school's equipment is sufficient to support the subject matter. Given the school's record of poor student achievement outcomes in these Computer Programming and Computer Technology & Networking programs, the Commission is unconvinced and found it to be of critical importance for the school to assess the adequacy of equipment on a program by program basis.

Computer Programming (AAS) Main School		
Annual Report	Graduation	Employment
2017	36%	33%
2016	0%	0%
2015	0%	0%

Computer Programming (AAS) Satellite Location		
Annual Report	Graduation	Employment
2017	0%	0%
2016	No Report	
2014	N/A	N/A

Computer Technology & Networking (AAS) - Main School		
Annual Report	Graduation	Employment
2017	37%	70%
2016	55%	64%
2015	39%	71%

Computer Technology & Networking (AAS) - Satellite Location		
Annual Report	Graduation	Employment
2017	54%	71%
2016	27%	75%
2015	25%	100%

In addition to the school’s statement, the response includes selected comments by Program Advisory Committee from the Fall and Spring 2017 meetings of the “Networking” and “Programming” committees. The commenters indicated that the school’s equipment is sufficient and do not make recommendations for any further equipment. The Commission noted, however, that the excerpted comments do not provide context or the discussion with regard to the full group of PAC members who reviewed the equipment.

According to the February 16, 2018 TSR for CA-Flagstaff, the school recently retired 2 of the 3 EKG machines for the Medical Specialties program and has yet to replace them. In conversations with the lead faculty, it appears that the class of 18 students in the last term had difficulty obtaining enough practice time with only one EKG machine available. In response to the TSR the school stated,

The ECG course in question was held in the March 2017 module. During the prior module when the ECG course was offered the course instructor did not report that two of the three machines were not functioning. The instructor in the March module was a different instructor and she did not report the problems with the two machines until she needed them for skills practice. At that time, the search for replacement machines began. While seeking new machines the class was not offered. The campus has corrected this issue.

CollegeAmerica Flagstaff now has 2 ECG machines in good working order. The class size is now limited to 12 students and the last two of classes using these machines had 9 and 6 students respectively which allowed for plenty of hands on time for each student.

To support the above statement, the school provided a “Replacement ECG Chronology,” indicating that the school acquired two ECG machines from a healthcare facility that were scheduled to be “retired” by that facility. Although the response claims that the school now has two ECG machines in good working order, there is no documentation to support this assertion or to show that “retired” ECG machines are in fact adequate.

Based on the foregoing, these schools have not demonstrated that instructional materials and equipment are sufficiently comprehensive and reflect current occupational knowledge and practice. Accordingly, the Commission directs these schools to submit the following:

- a. State the educational objectives of the Computer Technology and Networking program, the Computer Programming program, and the Computer Science program at California College San Diego, including the nature, nature and level of occupation for which training is provided, and then provide a comprehensive list of the instructional materials and equipment necessary to fulfill the educational objectives of each program;
 - b. Specific review and commentary by each Program Advisory Committee for the programs listed in (a.) above at CCSD, affirming that the list accurately portrays the resources necessary to support the curriculum and provide graduates with the skills necessary to fulfill the educational objectives of the program;
 - c. Provide a description of the specific physical hardware required to support learning via the virtualized labs for the Computer Technology and Networking program, the Computer Programming program, and the Computer Science program at CCSD;
 - d. A list of instructional materials and equipment at CCSD for the Computer Technology and Networking program, the Computer Programming program, and the Computer Science program, cross-referenced to the lists of required materials and equipment provided in item (a.) and item (c.) above, to demonstrate that the schools' resources meet the requirements;
 - e. A description of CCSD's most recent assessment of equipment and instructional materials, and corresponding plan for ongoing improvement in this area;
 - f. Documentation that CA-Flagstaff acquired the second ECG and that both machines are in good working order; 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 with regard to program equipment.
17. CEHE did not demonstrate that the schools' Program Advisory Committees (PACs) comply with accrediting standards (*Section II (A)(6), Substantive Standards, Standards of Accreditation*).

CCSD (#M001073)

According to the February 16, 2018 TSR for CCSD, the school did not demonstrate that the Program Advisory Committee reviews and comments, at least annually, on the academic general education courses, program length, and adequacy of facilities and equipment. In response, the school provided Program Advisory Committee meeting minutes as follows:

Program Name	Date of Meeting
Healthcare Administration	April 28, 2017 October 13, 2017
Medical Specialties	April 28, 2017 October 13, 2017
School of Technology	June 10, 2016 April 28, 2017
Technology, Networking	April 28, 2017
Business Management and Accounting	April 28, 2017

The Commission conducted a careful review of the minutes provided and it does not appear that the members discuss the academic general education courses annually.

CA-Flagstaff, M070742)

According to the February 16, 2018 TSR for CA-Flagstaff, the school did not demonstrate that the Program Advisory Committee meetings include at least three members in attendance that represent the employment community and/or practitioners from the program area. The school’s response acknowledges that the previous school director did not consistently conduct meetings with at least three members present representing the employment community. According to the response, the current school director and the CEHE Compliance Department have conducted training in this regard and the response includes copies of Program Advisory Committee meeting minutes as listed below:

Program Name	Date of Meeting
School of Business	April 21, 2017
Healthcare	April 21, 2017
Technology	April 21, 2017

In addition to the minutes identified above, the response includes three identical sets of minutes for a meeting conducted on an unknown date. The minutes indicate the purpose of the meeting is to follow up on the recommendations made at the Spring 2017 meeting. Therefore, although the minutes now identify the members and there appear to be three members in attendance that represent the employment field, the Commission is interested in reviewing a more recent set of PAC meeting minutes demonstrating that CA-Flagstaff records minutes in sufficient detail to show compliance with accrediting standards.

SHC-Logan (#B070584)

According to the February 16, 2018 TSR for SHC-Logan, the school did not demonstrate that minutes of PAC meetings consistently include the titles of the PAC members who attended the meeting, detail regarding the PAC’s commentary and review of curriculum, or show the PAC’s review and comment regarding student graduation and graduate employment rates for the business-related programs. In response, the school provided minutes for Program Advisory Committee meetings for the School of Business conducted on March 15, 2017 (prior to the on-site evaluation), and September 28, 2017. The Commission noted the following:

- With regard to the identification of Program Advisory Committee members, the Commission found that the March 15, 2017 minutes provide insufficient information regarding PAC member affiliations to demonstrate which PAC members represent the employment community. In particular, abbreviations used to identify companies prevent a determination regarding the qualification of the individual as representatives of the employment community. Although the September 28, 2017 minutes provide the titles and companies of members in more detail, the Commission is interested in reviewing additional minutes to ensure the new format will be successfully replicated as of means of recording sufficient detail.
- The school indicated that the strategy “to provide more meaningful meeting minutes was for the Campus Director to be more involved and in, and exert more control, in all PAC meetings” and that “[t]his change was implemented for the spring 2018 PAC meeting held March 19-22, 2018.” The Commission is interested in reviewing the minutes for the Spring 2018 meetings to ensure the new strategy results in more meaningful meeting minutes.

- With regard to the review and comment on student graduation and graduate employment rates, the school's response indicates that the Program Advisory Committee did not review and comment in those areas when the rates are above-benchmark. The school stated "[f]or future PAC meetings, the Campus Director will lead a discussion regarding employment rates even if the program is above the benchmark." The Commission found that the school's action in this area is correct, as the standard indicates that the rates are to be reviewed on an annual basis, whether or not the rates are above or below ACCSC's benchmarks. The September 28, 2017 minutes show that the rates have been reviewed for the Accounting (BS), Business Administration (BS), Business Management & Accounting (AAS) programs. However, given the misunderstanding regarding the review of student achievement outcomes and the importance of this component of the PAC standards, the Commission is interested in reviewing minutes of meetings of Program Advisory Committees for all programs.

SHC-Idaho Falls (#B072351)

According to the February 16, 2018 TSR for SHC-Idaho Falls, the school did not demonstrate that minutes of written and detailed minutes of each Program Advisory Committee meeting include a description of all members in attendance (i.e., titles and affiliations); and the time, and location of the meeting or that the school documents consideration of Program Advisory Committee input. In response, the school asserted that the minutes provided to the on-site evaluation team included sufficient information to determine compliance with standards. The response includes three identical copies of meeting minutes from the Program Advisory Committee meeting conducted on December 8, 2016. Although Page 12 of 53 refers to Exhibit 7.a.3 as "2017 PAC minutes," it is another copy of the December 8, 2016 meeting minutes. The Commission reviewed the minutes and does not agree that the minutes provide sufficient detail with regard to the members' review and comment for each specific program. The minutes show that there was a general meeting of all members and a breakout for business and healthcare programs. The minutes do not reflect the required discussion for each specific program. For example, the "healthcare program" group was asked "[d]o you feel the courses are appropriate for the degree being offered?" It is not clear, from the minutes, which program of the "healthcare" group, is under review.

With regard to consideration of PAC input, the response indicates that the "Idaho Falls Campus discussed all suggestions from the PAC meeting during campus executive team meetings following the PAC. The PAC suggestions were then followed up on in appropriate subsequent meetings, such as faculty meetings." The response includes minutes from an executive team meeting of five attendees identified by first names only – dated December 9, 2016 – in which the suggestions are listed. According to the minutes, the executive team decided to refer all suggestions to the faculty for review. The response also includes minutes from a faculty meeting dated December 12, 2016 with five attendees identified by first names only. The suggestions and brief discussion are included in the meeting minutes; however, it is not clear to which programs the input pertained or which programs the faculty members represent.

Based on the foregoing, the Commission found that the identified schools have not demonstrated that Program Advisory Committee meetings are conducted and recorded in accordance with ACCSC standards. Accordingly, the school is directed to submit the following:

- a. Policies and procedures for conducting and recording Program Advisory Committee meetings;
- b. A list of Program Advisory Committees for each school, identifying the programs that each committee reviews;

- c. A list of current Program Advisory Committee members for each committee at each school, identifying the members that fulfill the requirement of representation of the employment community;
- d. A list of Program Advisory Committee meetings conducted from July 1, 2017 to June 30, 2018;
- e. Copies of minutes for each meeting listed above; and
- f. Evidence that the school has given consideration to Program Advisory Committee input, whereby a school describes whether recommendations were implemented or not and explains the school's decisions.

18. CEHE must demonstrate the continuity of management and administrative capacity at the CA-Flagstaff campus through the reasonable retention of management and administrative staff (*Section I (A)(4), Substantive Standards, Standards of Accreditation*). The February 16, 2018 TSR raised a question about recent turnover, particularly in the Executive Director position. In response, the school asserted that [REDACTED], the previous Executive Director, had been in her position for three years prior to her unexpected retirement. At that time, [REDACTED] the Vice President of On-Ground Operations, took over as director until [REDACTED] was appointed as interim director for six weeks when [REDACTED] became the permanent Executive Director. According to the school's response, [REDACTED] has already implemented several structural changes that will support the ongoing retention of managers. The Commission is interested in a description of the current management team, as well as the changes that [REDACTED] has implemented to improve retention of managers.

Based on the foregoing, the Commission directs the CA-Flagstaff to submit the following:

- a. A list of all management and administrative staff (including corporate staff as applicable) employed by the school in the following format, organized by position as follows:

Position	Staff Member's Name	FT / PT	Assumed Duties (month/year)	Number of Years Employed

- b. The school most recent assessment regarding the retention of the management and administrative staff at the CA-Flagstaff campus;
- c. A description of the strategies that the school has implemented to improve retention of management and administration staff at the CA-Flagstaff campus; and
- d. 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.

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:

As stated in the April 27, 2017 Warning Orders to CollegeAmerica in Denver, Colorado (School M001507) and CollegeAmerica in Fort Collins, Colorado (School B070544), pursuant to *Section VII (M)(1), Rules of Process and Procedure, Standards of Accreditation*, the period allotted to the school to remedy the noncompliance or cure the deficiency, together with the time for the Commission's final decision, will not exceed two years. Thus, the school must be able to demonstrate successful student achievement through the total re-evaluation process. The timeframe to achieve compliance for those two schools began as of April 27, 2017 and ends on April 27, 2019.

With regard to the other CEHE-affiliated schools, based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and the schools' longest program of more than two years, the maximum timeframe allowed for the CEHE-affiliated schools, with the exception of the two schools listed above, to achieve and demonstrate compliance with the *Standards of Accreditation* is two years. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on **September 7, 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.

NOTIFICATION TO STUDENTS:

CEHE schools must inform current and prospective students in writing that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission's website (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*).

TEACH-OUT PLAN REQUIREMENT:

Given the serious nature of the issues outlined herein, the Commission directs CEHE to provide an [ACCSC Institutional Teach-Out Plan Approval Form](#) for each school which must be submitted as part of the response for the items listed above.

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.

CEHE 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.⁷ 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.

CEHE must upload the school's electronic response directly to ACCSC's College 360 Database for each campus. 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 College 360 DMS Submissions 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 December 21, 2018**. If a response, the required fee,⁸ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before December 21, 2018**, 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 assistance or additional information, please contact me at [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

Encl: Appendix I

⁷ 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.

⁸ ACCSC assesses a \$1,000 processing fee to a school placed on Probation.

APPENDIX I
Accreditation Actions Considered

School	Accreditation Actions Considered	Materials Considered
California College San Diego (#M001073) San Diego, California	<ul style="list-style-type: none"> • Renewal of Accreditation • Change of Location • Outcomes Report 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response • February 16, 2018 Change of Location On-Site Evaluation Report and the school's response • September 26, 2017 Outcomes Report
College America (#M070742) Flagstaff, Arizona	<ul style="list-style-type: none"> • Renewal of Accreditation 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response
CollegeAmerica (#B070743) Phoenix, Arizona	<ul style="list-style-type: none"> • Renewal of Accreditation 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response
Independence University (#B072309) Salt Lake City, Utah	<ul style="list-style-type: none"> • Renewal of Accreditation • 2017 Annual Report Rates 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response • March 14, 2018 ACCSC letter and the school's response
Stevens-Henager College (#B070581) West Haven, Utah	<ul style="list-style-type: none"> • Renewal of Accreditation/ Degree Program • 2017 Annual Report Rates 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response • March 14, 2018 ACCSC letter and the school's response
Stevens-Henager College (#B070582) Orem, Utah	<ul style="list-style-type: none"> • Renewal of Accreditation 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response
Stevens-Henager College (#B070583) Murray, Utah	<ul style="list-style-type: none"> • Renewal of Accreditation/ Degree Program • 2017 Annual Report Rates 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response • March 14, 2018 ACCSC letter and the school's response
Stevens-Henager College (#B070584) Logan, Utah	<ul style="list-style-type: none"> • Renewal of Accreditation 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response
Stevens-Henager College (#B072351) Idaho Falls, Idaho	<ul style="list-style-type: none"> • Renewal of Accreditation 	<ul style="list-style-type: none"> • February 16, 2018 Team Summary Report and the school's response • March 14, 2018 ACCSC letter and the school's response