Accrediting Commission of Career Schools and Colleges

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September 10, 2018   **ELECTRONIC DELIVERY**

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Campus President
Fortis College   *School #M000648*
555 E. Alex Bell Rd.   *Warning*
Centerville, Ohio 45459-2712

Dear ████████

At the November 2017 meeting, the Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") considered the following applications and reports submitted by Fortis College ("Fortis-Centerville") located in Centerville, Ohio.

- Application for Renewal of Accreditation;

- Application for a Distance Education Facility for the facilities in Greenwood Village, Colorado and Winter Park, Florida;

- Application for an Academic Associate Degree for the Medical Billing and Coding (AAS) program, and

- An Outcomes Report

Upon review of the July 31, 2017 Team Summary Report ("TSR"), the Commission's March 16, 2016 letter, and the school's responses, the Commission voted to place Fortis-Centerville on **Warning** with a subsequent review scheduled for ACCSC's February 2019 meeting. In addition, the Commission directed Fortis-Centerville to cease enrollment in programs delivered via distance education. The reasons for the Commission's decision and the Commission's requirements for the school to demonstrate compliance are set forth below.

Accreditation History

The Commission considered the school's current compliance status in context of the accreditation history described in the TSR (excerpted below) and found that longstanding issues – such as below-benchmark rates of student achievement in distance education programs - indicate that the school's management has been unable to assess school operations to identify root causes and implement effective change.

November 2013 **Renewal of Accreditation Application for Expansion of Distance Education Application for an Academic Associate Degree Program Outcomes Report Commission Review**	**Action: Probation** Due to the reported rates of student achievement and other concerns as cited in the Probation Order regarding the school's distance education operations and programs, the Commission directed Fortis College to cease enrollment in the following distance education programs: - Criminal Justice/Homeland Security – DE (AAS) - Digital Graphic Design-DE (AAS) - Medical Administrative Assistant-DE (AAS); and - Medical Billing and Coding-DE (AAS)

	The Commission voted to direct an Announced On-site Evaluation at the distance education separate facilities located in Winter Park, Florida and Greenwood Village, Colorado, to verify the following: (1) Management and Administrative capacity (2) Compliance with federal and state government requirements (3) Approval of separate facilities (4) Student achievement (5) Faculty qualifications (6) Verification of prior work experience for faculty (7) Program Advisory Committee
April 2014 **Program Discontinuation**	ACCSC acknowledged the school's program discontinuation notification for the Digital Graphic Design-DE (AAS) degree program.
May 2014 **Probation Order** **Commission Review**	**Action: Vacate Probation/Show Cause Order** (1) Compliance with federal and state government requirements (2) Approval of separate facilities (3) Student achievement (4) Student Satisfaction
July 2014 **Program Discontinuation**	ACCSC acknowledged the school's program discontinuation notification for the Electronics Engineering Technology (AAS) program.
August 2014 **Financial Structure** **Commission Review**	**Action: System-wide Warning** (1) Financials (2) Compliance with federal requirements
November 2014 **Show Cause (Warning) Order** **Commission Review**	**Action: Continued Warning Order** (1) Student achievement (2) Student satisfaction
November 2014 **System-wide Review** **Commission Review**	**Action: Continued System-wide Warning** (1) Financials (2) Proof of Graduation (3) Compliance with federal requirements/regulatory actions
November 2014 **Program Discontinuation**	ACCSC acknowledged the school's program discontinuation notification for the Computer Security and Forensics (AAS), Paramedic (AAS), and Criminal Justice/Homeland Security-DE (AAS) programs.
January 2015 **Program Discontinuation**	ACCSC acknowledged the school's program discontinuation notification for the Criminal Justice (AAS) program.
May 2015 **Continued System-wide Warning** **Commission Review**	**Action: Continued System-wide Warning** (1) Financials (2) Proof of Graduation (3) Compliance with federal requirements/regulatory actions In addition, at the May 2015 meeting, as a separate action from the investigation of the EA-affiliated schools by the Office of Inspector

	General, the Commission considered its previous decision to place Fortis College in Centerville, Ohio on Warning. The Commission is holding the final decision on the Warning in abeyance pending the resolution of the OIG matter that will be considered by the Commission at its August 2015 meeting.
February 2016 **System-Wide Warning** **Commission Review**	**Action: Vacate the System-Wide Warning and place the system on Financial Reporting**
February 2016 **Renewal of Accreditation** **Expansion of Distance Education** **Degree Programs** **Branch Part I** **Unrelated New Program** **Distance Education** **Consortium Agreement** **Applications for Distance Education Facility** **Commission Review**	**Action: Accredit three (3) years going forward from May 2013**; approve the following: • Expansion of distance education for the Registered Nurse to Bachelor of Science in Nursing-DE (BSN) program; • Retail Management-DE (AAB) and Web Development-DE (AAS) programs; • Branch campuses for Fortis College in Cutler Bay, Florida (B072358), Fortis College in Indianapolis, Indiana (B072275), and Fortis College located in Largo, Florida (B070771); • Medical Assisting (AS) and Paramedic (AS) programs; approve Emergency Medical Technician (diploma) and Medical Billing and Coding (diploma) programs; • Distance Education Consortium Agreements with Fortis College-Phoenix (B072191) and Fortis Institute (M068504) • Distance Education Facilities located at 6455 S. Yosemite Street, Greenwood Village, Colorado 80111 and 2699 Lee Road, Winter Park, Florida 32789 Stipulation 　(1) Executed enrollment agreements
April 2016 **Program Discontinuation**	ACCSC acknowledged the school's program discontinuation notification for the Criminal Justice (AAB), Registered Nurse to Bachelor of Science in Nursing, and Medical Coding Specialist (Diploma) program.
May 2016 **Special Consideration** **Commission Review**	Action: Approve request to extend term of accreditation, accept stipulation response, and accredit Fortis-Centerville four (4) years going forward from May 2013
May 2016 **Application for a New Program-Related**	ACCSC approved the school's application for the Medical Assisting (Diploma) program, effective May 12, 2016.
June 2016 **Program Discontinuation**	ACCSC acknowledged the school's program discontinuation notification for the Paralegal (AAB) program.
August 2016 **Financial Reporting** **Commission Review**	**Action: Continue system-wide Financial Reporting**

December 2016 Program Discontinuation	ACCSC acknowledged the school's program discontinuation notification for the Medical Assisting (AAS), Emergency Medical Technician (Diploma), and Medical Billing and Coding (diploma) program.

November 2017

1. Fortis-Centerville 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*). The Commission noted the following with regard to the scope of the student achievement issues at Fortis-Centerville. The school is currently approved to offer nine active programs and is teaching out three programs. The school reported below-benchmark rates of graduation and/or employment for all twelve programs with the Outcomes Report, in response to the TSR, or with the 2017 Annual Report, as outlined below:

Report Date July 2017					
Program (Credential)	**Length in Months**	**Reported Graduation Rate**	**ACCSC Benchmark Graduation Rate**	**Reported Employment Rate**	**ACCSC Benchmark Employment Rate**
Dental Assisting (Diploma)*	12	**50%**	55%	73%	70%
Heating, Ventilating, Air Conditioning, and Refrigeration (Diploma)***	9	**53%**	60%	75%	70%
Medical Assisting (AAS)*	17	67%	47%	**0%**	70%
Medical Assisting (Diploma)***	11	**38%**	55%	**67%**	70%
Medical Billing and Coding (AAS)*	17	**29%**	47%	**50%**	70%
Network Administration and Security (AAS)[1]**	18	**38%**	47%	**0%**	70%
Nursing (AAS)***	24	**38%**	40%	85%	70%
Practical Nursing (Diploma)*	15	**41%**	50%	86%	70%
ACTIVE DISCONTINUED PROGRAMS					
Accounting Technology – DE (AAB)*	19	**21%**	43%	**53%**	70%
Business Management – DE (AAB)*	19	**33%**	43%	**51%**	70%
Human Resources Management-DE (AAB)*	17	**28%**	47%	**33%**	70%
Internet Marketing-DE (AAB)*	17	**11%**	47%	100%	70%

*   Drawn from the August 2017 Outcomes Report.
**   Drawn from the response to the July 31, 2017 TSR.
*** Drawn from the school's 2017 Annual Report.

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[1] Formerly titled Cyber Security

ACTIVE PROGRAMS

Dental Assisting (Diploma)

The Dental Assisting program was approved in 2011 and first became reportable with the 2013 Annual Report. The student achievement rates reported via the Annual Report since that time shows that the school's efforts to improve the graduation rate have not been successful.

Dental Assisting (Diploma) 12-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	**50%**	55%	73%	70%
2016	**46%**	55%	83%	70%
2015	**52%**	55%	**64%**	68%
2014	60%	55%	68%	68%
2013	67%	54%	87%	66%

The school's response to the Outcomes Report provided a synopsis of the school's efforts to improve graduation rates in this residential program, including standardizing the curriculum, changes in key staff, preparation for credentialing exams, implementation of a new academic advising model, and daily meetings to identify at-risk students and allocate resources appropriately. According to the Outcomes Report, the retention in the Dental Assisting program is at "50% with 38 students available for retention and 19 withdrawn/terminated students." The Commission found that additional monitoring is warranted to assess the school's ongoing efforts to improvement student achievement outcomes in the Dental Assisting program.

Heating, Ventilating, Air Conditioning, and Refrigeration (Diploma)

Fortis-Centerville has reported above-benchmark rates for the Heating, Ventilating, Air Conditioning, and Refrigeration (Diploma) program over the last five years, with the exception of the below-benchmark graduation rate reported with the 2017 Annual Report. Fortis-Centerville 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.

Heating, Ventilating, Air Conditioning, and Refrigeration (Diploma) 9 month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	**53%**	60%	75%	70%
2016	80%	60%	89%	70%
2015	65%	60%	90%	68%
2014	73%	60%	71%	68%
2013	59%	54%	94%	66%

Medical Assisting (AAS)

The Medical Assisting (AAS) program is approved for hybrid delivery and was approved by ACCSC in August 2008 (approved as Medical Administrative Assistant and modified to Medical Assisting as of December 2014). The Commission noted that with the 2016 Annual Report, the school reported 427 students started from March 2013 to February 2014 and 107 graduated. By contrast, with the 2017 Annual Report, the school reported three starts from March 2014 to February 2015, with two graduates. While the graduation rates appear to have improved, the number of graduates has changed so markedly that additional monitoring of this program is warranted. In addition, it appears that the two graduates did not pass the licensure examination and are not employed in field.

Medical Assisting (AAS) 17-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	67%	47%	**0%**	70%
2016	**25%**	47%	37%	70%
2015	**36%**	47%	100%	68%
2014	**38%**	47%	**45%**	68%
2013	**37%**	42%	69%	66%

The school's response to the Outcomes Report provided a synopsis of the school's efforts to improve graduation rates in the online programs, including a new director of Student Services; a revised New Student Orientation; a focus on at-risk students that includes early intervention and enhanced student engagement; restructuring of the Student Services Department; and enhanced internal communication. According to the Outcomes Report, the retention in the Medical Assisting program is at "29% with 24 students available for retention and 17 withdrawn/terminated students." Given the recent dramatic improvement in graduation rates in context of a dramatic reduction in number of student starts, the Commission is interested in more individuated analysis of the Medical Assisting (AAS) program and any specialized strategies implemented to target improved student success in this program.

Medical Assisting (Diploma)

This program was approved by ACCSC in May 2016, and was first reportable with the 2017 Annual Report. Fortis-Centerville 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.

Medical Assisting (Diploma) 11-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	**38%**	55%	**67%**	70%

Medical Billing and Coding (AAS)

The Medical Billing and Coding (AAS) program is approved for hybrid delivery and was approved by ACCSC in August 2008. The student achievement rates reported via the Annual Report over the last

five years show that the school's efforts to improve the graduation and employment rates have not been successful.

Medical Billing and Coding (AAS) 17-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	29%	47%	50%	70%
2016	30%	47%	41%	70%
2015	35%	47%	54%	68%
2014	39%	47%	43%	68%
2013	43%	42%	66%	66%

The school's response to the Outcomes Report provided a synopsis of the school's efforts to improve graduation rates in the online programs, including a new director of Student Services; a revised New Student Orientation; a focus on at-risk students that includes early intervention and enhanced student engagement; restructuring of the Student Services Department; and enhanced internal communication. According to the Outcomes Report, the retention in the Medical Billing and Coding (AAS) program is at "27% with 11 students available for retention and 8 withdrawn/terminated students." Given the lack of improvement shown in the graduation and employment rates, the Commission is interested in more individuated analysis of the factors impacting the Medical Billing and Coding (AAS) program and any specialized strategies implemented to target improved student success in this program.

Network Administration and Security (AAS)

This program, delivered in a hybrid format, was approved as "Cyber Security and Forensics (AAS) in February 2011. The program first became reportable with the 2014 Annual Report. The student achievement rates reported via the Annual Report since that time show a recent downward trend in both graduation and employment rates.

Network Administration and Security (AAS) 18-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	38%	55%	0%	70%
2016	33%	55%	83%	70%
2015	64%	55%	86%	68%
2014	50%	55%	92%	68%

In addition to questions regarding student achievement, the July 31, 2017 TSR raises specific questions with regard to how the curriculum, course objectives, and learning materials align with the name of the program and defined employment outcomes. The Commission's evaluation of the programs revisions is outlined in Item #6 of this letter.

Nursing (AAS)

Fortis-Centerville has reported above-benchmark rates for the Nursing (AAS) program over the last four years, with the exception of the below-benchmark graduation rate reported with the 2017 Annual Report. Fortis-Centerville 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.

Nursing (AAS) 24-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	**38%**	40%	85%	70%
2016	52%	40%	86%	70%
2015	73%	36%	92%	68%
2014	59%	36%	92%	68%
2013	No starts reported			

Practical Nursing (Diploma)

The Practical Nursing (Diploma) program was approved in 2002 and is delivered in a hybrid format. The Commission noted that the student achievement rates reported via the Annual Report over the last five years show a downward trend in graduation rates from 2014 to 2016, with an increase in 2017 that will insufficient to improve the graduation rate above the benchmark.

Practical Nursing (Diploma) 15-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	**41%**	50%	86%	70%
2016	**32%**	50%	83%	70%
2015	**45%**	51%	78%	68%
2014	61%	51%	78%	68%
2013	78%	45%	85%	66%

In response to the TSR, the school explained that the student demographic in the Practical Nursing program is non-traditional working individuals that have unique challenges in regular attendance. The school described measures taken to ensure that prospective students understand the academic requirements and rigor of the program before enrolling. Of particular importance, according to the response, is effective student advising, which is "an integral part of a college education." The school uses a service called WellConnect to provide "confidential, voluntary counseling and resource referral service provided free of charge to the student." The response also indicates that there was a change of leadership in the Nursing Department, with a new Dean of Nursing who started in June 2016. The new Dean established faculty expectation and accountability measures that resulted in some faculty turnover. Fortis-Centerville provided the Practical Nursing Retention Action Plan with the response, which includes the following strategies for improving the graduation rate in the Practical Nursing

(Diploma) program, including enhanced student engagement, faculty oversight, a mentor program, academic coaches, strengthened attendance monitoring, and tutoring. According to the response,

> *The nursing program is on track to meet benchmark of 50% for 2018 in the Practical Nursing-15 Month, Diploma. The NCLEX-PN pass rate is currently 88.57%, which continues to trend upward from a 79.59% at the end of the calendar year for 2016. The Nursing Department will continue to monitor attendance, student academic progress, and interventions to help students complete the program and to pass the NCLEX exam.*

Given that the school is predicting an above-benchmark rate for the 12-month schedule of the Practical Nursing (Diploma) program for the 2018 Annual Report, the Commission will review those reported rates to ensure the strategies have been successful. In addition, the Commission noted that the school reported a licensure exam pass rate of 50% and an employment rate of 50% with the 2017 Annual Report for the 19-month schedule of the Practical Nursing (Diploma) program, based on one of two graduates licensed and employed in the field. The Commission is also interested in an updated report regarding this schedule of the program.

PROGRAMS IN TEACH-OUT

Accounting Technology – DE (AAB)

The school submitted a Programmatic Teach-Out Approval Form on May 30, 2018, indicating that the last student will graduate in March 2019. The Commission is interested in monitoring the teach-out of the program through its conclusion, to ensure that Fortis-Centerville remains attentive to the needs of the 19 remaining students listed as part of the Teach-Out Approval Form.

Business Management – DE (AAB)

The school submitted a Programmatic Teach-Out Approval Form on May 30, 2018 indicating that the last student will graduate in August 2019. The Commission is interested in monitoring the teach-out of the program through its conclusion, to ensure that Fortis-Centerville remains attentive to the needs of 83 remaining students listed as part of the Teach-Out Approval Form.

Human Resources Management-DE (AAS)

The school submitted a Programmatic Teach-Out Approval Form on September 8, 2017 indicating that the last student will graduate in March 2019. The Commission is interested in monitoring the teach-out of the program through its conclusion, to ensure that Fortis-Centerville remains attentive to the needs of the 66 remaining students listed as part of the Teach-Out Approval Form.

Internet Marketing-DE (AAB)

The school submitted a Programmatic Teach-Out Approval Form on November 6, 2017 indicating that the last student will graduate in March 2019. The Commission is interested in monitoring the teach-out of the program through its conclusion, to ensure that Fortis-Centerville remains attentive to the needs of 8 remaining students listed as part of the Teach-Out Approval Form.

Based on the foregoing, the Commission found that although the school has taken action to discontinue poorly performing programs, including all distance education only offerings, and has described an array of strategies to improve performance in the remaining programs, the current data raises a critical

question with regard to the school's ability to support the success of its students in terms of graduation and employment outcomes. Accordingly, the Commission directs the school to submit the following:

a. For the Accounting Technology-DE (AAB), Business Management-DE (AAB); Human Resource Management (AAS); and Internet Marketing-DE (AAS) programs, provide a list of the remaining students as submitted with the Programmatic Teach-Out Approval Form, updated to reflect the students' current status (e.g., withdrawn, terminated, graduated, employed in field, further education, unavailable for employment).

b. A Graduation and Employment Chart for the school's active and active discontinued programs 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.

c. 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 ID#	Program	Start Date	Graduation Date	Withdrawal/ Termination Date

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

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

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

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

d. For each program where licensure or certification is a requirement for employment, provide the information regarding licensure or certification examination pass rates for the graduates reported on the Graduation and Employment Charts submitted with this response.

e. For each program for which the reported rates of student graduation, graduate employment, or licensure/certification exam pass rates do not meet the ACCSC benchmark, the school must provide 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.

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

2.   Fortis-Centerville must demonstrate that the school is able to justify the classification of each graduate as employed in field in accordance with the *Guidelines for Employment Classification – Appendix VII* (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The July 31, 2017 TSR raised questions as to whether employment positions were appropriate and reasonable based on the educational objectives of the programs. In response, the school explained how it cross-references the information from the graduates' job description with the graduate's program description to confirm that the student is utilizing a majority of the skills acquired through the training. To illustrate the use of this process, the school provided specific responses to each of the graduates identified in the TSR. The Commission reviewed the documentation and found the following:

- ▮▮▮▮▮▮▮ graduate of the Cyber Security program employed as a Tech. Asst. with the ▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮▮-Centerville provided a copy of the Employment Verification form that lists the skills used as "various technology skills, Microsoft, computer set up, and email address maint." The response also includes an excerpt from the 2012 catalog with the program description and course outline for the Cyber Security and Forensics (AAS) program. Of the 25 courses listed, 2 are highlighted, presumably because they encompass skills the graduate uses on the job. The Commission found that the use of the skills acquired in 2 out of 25 courses does not show that a majority of the skills acquired in the training align with the employment position.

- ▮▮▮▮▮▮ Graduate of the Cyber Security program employed as an IT Service Desk Agent for ▮▮▮▮▮▮▮▮▮ Fortis-Centerville provided a copy of the Employment Verification form that lists the skills used as "software, hardware, and network support." The response also includes a job description and an excerpt from the 2012 catalog with the program description and course outline for the Cyber Security and Forensics (AAS) program. Of the 25 courses listed, two are highlighted, presumably because they encompass skills that the graduate uses on the job. The Commission found that the use of the skills acquired in 2 out of 25 courses does not show that a majority of the skills acquired in the training align with the employment position.

- ▮▮▮▮ – Graduate of the Cyber Security program employed as a Help Desk Support I for ▮▮▮ ▮▮▮▮▮▮▮▮▮▮▮ Fortis-Centerville provided a copy of the Employment Verification form that lists the skills used as "desktop support, customer service calls." The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Cyber Security and Forensics (AAS) program. There are five phrases of the program description highlighted, including "IT," "troubleshooting," "logical problems" "technical issues," and "hardware and software." None of the 25 courses listed are highlighted. The Commission found

that the documentation is insufficient to show that a majority of the skills acquired in the training align with the employment position.

- ▬▬▬▬ – Graduate of the Cyber Security program employed as a Technical Support Specialist for ▬▬▬▬▬▬. Fortis-Centerville provided a copy of the Employment Verification form that lists the skills used as "technical support, hardware, software, network, security." The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Cyber Security and Forensics (AAS) program. There are five phrases of the program description highlighted, including "IT," "network security," "troubleshooting," "researching solutions for technical issues," and "hardware and software." None of the 25 courses listed are highlighted. The Commission found that the documentation is insufficient to show that a majority of the skills acquired in the training align with the employment position.

- ▬▬▬ – Graduate of the Cyber Security program employed as a PC Field Technician for ▬▬▬ ▬▬▬ Fortis-Centerville provided a copy of the Employment Verification form that lists the skills used as "technical knowledge, customer service." The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Cyber Security and Forensics (AAS) program. Of the 25 courses listed, four are highlighted, presumably because they encompass skills the graduate uses on the job. The Commission found that the use of the skills acquired in 4 out of 25 courses does not show that a majority of the skills acquired in the training align with the employment position.

- ▬▬▬▬ – Graduate of the Dental Assisting program employed as a Front Desk receptionist with ▬▬▬▬▬▬. Fortis-Centerville provided a copy of the Employment Verification form that lists the job responsibilities as scheduling, insurance processing, and phones. The response also includes an excerpt from the 2014-2015 catalog with the program description and course outline for the Dental Assisting (AAS) program. Of the 14 courses listed, three are highlighted, presumably because they encompass skills the graduate uses on the job. The Commission found that the use of the skills acquired in 3 out of 14 courses does not show that a majority of the skills acquired in the training align with the employment position.

- ▬▬▬▬ – Graduate of the Medical Assisting (AAS) program employed as a Medical Receptionist with ▬▬▬▬▬▬ Fortis-Centerville provided a copy of the Employment Verification form that lists the job responsibilities as patient scheduling. The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Medical Assisting (AAS) program. Of the 19 courses listed, five are highlighted, presumably because they encompass skills the graduate uses on the job. The Commission found that the use of the skills acquired in 5 out of 19 courses does not show that a majority of the skills acquired in the training align with the employment position.

- ▬▬▬▬ Graduate of the Paralegal (AAB) program employed as an "Admin/Examiner in Training" with ▬▬▬▬▬▬. Fortis-Centerville provided a copy of the Employment Verification form that lists the job responsibilities as review real estate documents, filing, and title search. The response also includes an excerpt from the 2012 catalog with the program description and course outline for the Paralegal (AAB) program. Of the 24 courses listed, none are highlighted. A single phrase in the program description is highlighted: "real estate offices." The Commission found that the document does not show that a majority of the skills acquired in the training align with the employment position.

- ▬▬▬▬ Graduate of the Business Management – DE (AAB) program employed as a Clinic Access Rep I for ▬▬▬▬▬▬. Fortis-Centerville provided a copy of the Employment

Verification form that lists the job responsibilities as "clerical float." The attached job description indicates responsibilities include "accurately registering patients… validating patient information…verification of insurance coverage… collection of required payments." The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Business Management - DE (AAB) program. Of the 29 courses listed, four are highlighted, presumably because they encompass skills the graduate uses on the job. The Commission found that the use of the skills acquired in 4 out of 29 courses does not show that a majority of the skills acquired in the training align with the employment position.

- ▮▮▮▮▮▮▮▮ Graduate of the Business Management – DE (AAB) program employed as a Case Manager/Billing Specialist with ▮▮▮▮▮▮ ▮. Fortis-Centerville provided a copy of the Employment Verification form that lists the job responsibilities as "submit cases + billing." The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Business Management - DE (AAB) program. Of the 29 courses listed, zero are highlighted, however, four phrases in the program description are highlighted, including "entry-level business management," "administrative positions in business," "secretarial," and "entry-level administrative positions." The Commission found that the documentation does not show that a majority of the skills acquired in the training align with the employment position.

- ▮▮▮▮▮▮ – graduate of the Business Management – Hospitality DE (AAB) program employed at the Front Desk with the ▮▮▮▮▮▮▮▮▮▮▮▮▮. Fortis-Centerville provided a copy of the Employment Verification form that does not include any job responsibilities or skills used. The response also includes an excerpt from the 2013 catalog with the program description and course outline for the Hospitality Management - DE (AAB) program. Of the 25 courses listed, zero are highlighted; however, three phrases in the program description are highlighted, including "hospitality" "private clubs," and "front office." The Commission found that the documentation does not show that a majority of the skills acquired in the training align with the employment position.

Based on the foregoing, the Commission found that the school has yet to provide evidence that the school's policies and procedures are written in such a way as to ensure that the school is able to justify the classification of each graduate as employed in field. Accordingly, the Commission directs the school to submit the following:

a. A copy of the school's policies and procedures for justifying each employment classification that includes the following elements:

- 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.

b. List of all graduates from July 1, 2018 to September 1, 2018 that have been classified as "employed in field";

c. Employment records for the graduates list above, including documentation of how the school justifies the 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.

3.   Fortis-Centerville must demonstrate that the school supports student achievement rates through verifiable records of initial employment maintained in accordance with the *Guidelines for Employment Classification – Appendix VII* (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The July 31, 2017 TSR notes that in cases where the school relies on verbal verification, Fortis-Centerville did not document that the school obtains verbal verification from the graduate **and** the employer. In response, Fortis-Centerville provided a description of the school's policies and procedures for securing verifiable records of initial employment, which include securing documentation of verbal verification from the graduate **and** the employer. In addition, the school stated

> *Employment Verifications from November 2016 to July 2017 have been collected to demonstrate to the Commission the consistent documentation standards Fortis College adheres to when a verbal verification is necessary. Of our residential programs, out of 129 records there is only (1) one graduate… with a verbal verification… Of our online programs, out of 31 records there is also only (1) graduate… with a verbal verification*

The Commission reviewed the two records and found that the Employment Verification forms have handwritten notes regarding the date of verbal verification and individuals contacted. Due to the small sample size, the Commission is interested in reviewing additional records to ensure that the policy has been implemented effectively.

In addition, during the review of employment records, the Commission noted that the records for two self-employed graduates do not appear to include the elements required by accrediting standards. Specifically, the records for ▮▮▮▮▮ graduate of the Business Management-DE (AAB) program self-employed as an Electrician) and ▮▮▮▮▮ (graduate of the Business Management-DE (AAB) program and self-employed with ▮▮▮▮▮▮▮) include correspondence with the graduate; however, the records do not include the required attestations.

Overall, the Commission recognizes the revisions made to the school's policies and procedures and determined that additional monitoring is warranted to ensure recordkeeping practices are implemented to document compliance with accrediting standards. Therefore, the Commission directs the school to submit the following:

a.   A list of all graduates classified as "employed in field" from July 2017 to July 2018.

b.   From the list above, highlight those cases in which the school relied on verbal verification from the graduate and the employer. For each of those graduates, provide the verifiable records of initial employment, to include:

    -   Documentation of diligent efforts to secure written documentation without success;

    -   The graduate's and employer's name and contact information;

    -   A signature of school staff attesting to verbal employment verification with the employer and the date of verification; and

    -   A signature of school staff attesting to verbal employment verification with the graduate and the date of verification.

   c.   From the list of graduates classified as "employed in field" from July 2017 to July 2018, highlight those graduates that are "self-employed" and for each of those graduates, provide written documentation from the self-employed graduate verifying that the employment is valid including, at a minimum, a statement signed by the graduate which includes the following:

- The graduate's name and contact information;

- An attestation that the self-employment is aligned with the individual's employment goals, is vocational, and is based on and related to the education and training received;

- An attestation that the graduate is earning training-related income; and

- In cases where licensure is required for employment, an attestation that such licensure has been achieved.

   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.

4.   Fortis-Centerville must demonstrate compliance with all applicable federal, state, and local requirements (*Section I (B)(1)(e)(iii), Rules of Process and Procedure, Standards of Accreditation*), as follows:

   a.   Fortis-Centerville must demonstrate that the school is appropriately licensed in all states in which the school operates. The July 31, 2017 TSR raises a question with regard to distance education students located in states where the school did not have documentation to demonstrate the school is licensed to conduct training. In response, Fortis-Centerville explained how the school secures and maintains appropriate state authorization:

> *Obtaining authorization from each state in which the College wishes to offer online programs, is an extensive and laborious process. The current Director of Institutional Effectiveness and Compliance,* ▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇*, is responsible for managing the multifaceted obligation of researching, interpreting and executing compliance as each state mandates. In addition,* ▇▇▇▇▇▇▇▇▇▇▇ *corporate oversight by the National Director of Licensure and Accreditation,* ▇▇▇▇▇▇▇▇▇▇▇▇▇▇▇ *to assist with the complexities of legal compliance as it pertains to state authorization.*

According to the school's response, when the students in question enrolled, they were residing in states where the school is authorized to operate and subsequently moved. While the Commission recognizes the challenge of maintaining compliance in this area, it appears to be important to have policies and procedures to address the consequences when students move into states where the school is not authorized to operate.

   b.   Fortis-Centerville must demonstrate the qualifications of general education faculty teaching in a degree program comply with the requirements of the Ohio Department of Higher Education. The July 31, 2017 TSR raises a question with regard to the qualifications of three faculty members in context of the state requirements. In response, the school indicated that all three faculty members have been removed from teaching general education courses and offered assurance that "Fortis College will continue to uphold the current practices in place for validation of faculty credentials to meet the Ohio Department of Higher Education standards." The Commission is interested in reviewing the school's hiring criteria for general education faculty, to ensure the school's policies and procedures support compliance with the requirements of the Ohio Department of Higher Education.

Based on the foregoing, the Commission directs Fortis-Centerville to submit the following:

a. A description of the school's policies and procedures for monitoring and addressing the consequences address the consequences when students engaged in distance education move into states where the school is not authorized to operate;

b. A list of all students enrolled in distance education through Fortis-Centerville, and documentation of authorization to operate in each of the states in which the current students reside;

c. A copy of Ohio Department of Higher Education's requirements for faculty teaching general education in a degree program, cross-referenced to the school's hiring criteria for general education faculty teaching in a degree program; 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.

5. Fortis-Centerville must demonstrate that the school assesses whether students have the skills, competencies, and access to technology necessary to succeed in a distance education environment prior to their enrollment in the program (*Section IX (E)(2), Substantive Standards, Standards of Accreditation*). The July 31, 2017 TSR raises questions with regard to whether the school has implemented a meaningful assessment of the students' skills and competencies necessary to success in a distance learning environment, particularly in context of the below benchmark graduation rates for all distance education programs. In response, Fortis-Centerville stated "[f]ollowing the visit, upon further evaluation it became evident that an improvement to our assessment practices was both necessary and called for to assist in improving completion and graduation rates." In addition to the current process – an admissions interview, administration of the Wonderlic Scholastic Learning Exam, and an online Student Orientation – the school plans to implement two "key initiatives in the student enrollment process." The first is a technology skills assessment for online student applicants. The assessment consists of 25 questions and the prospective student must correctly answer 65% in order to be admitted. The response includes a copy of the assessment, which includes multiple choice questions such as:

- I would use the following software to write a paper
- I would use the following application to search the Internet
- I would use the following software to create a spreadsheet
- The following are examples of computer software
- The following are examples of computer hardware

The questions appear to focus on knowledge of basic computer concepts; however, it is not clear that the assessment addresses the students' skills and competencies with regard to distance learning. In addition, it is not clear that answering 15 of the 25 questions correctly is a sufficient indicator of the applicants' ability to succeed. In context of the poor student achievement outcomes in the distance education programs, it is of particular importance that the school implement strong measures to ensure that students are capable of benefitting from the training offered. According to the response, the school intended to implement the new assessment in October 2017, therefore the Commission is interested in an analysis of the effectiveness of the assessment tool.

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

a. A copy of the current methods the school uses to assess the student's technical skills, competencies, and access to technology necessary to succeed in a distance education environment prior to their enrollment and the school's reasoning for choosing this assessment method;

b. A description of the current assessment tool (e.g., test, preparation/ orientation course, etc.) to determine if the student's learning style is conducive to online learning and the school's reasoning for choosing this assessment method;

c. A list of all students admitted into the school's distance education programs from November 1, 2017 through April 30, 2018, in the following format:

Student ID#	Program	Start Date	Assessment Score	Current Status (Active, Withdrawn)

d. An analysis of the effectiveness of the school's assessment methods described in (a) and (b) 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.

6. Fortis-Centerville must demonstrate that the educational objectives of the Network Administration and Security program provide graduates with the necessary competencies, skills, and level of education for employment in their fields of study (*Section I (B)(1)(d)(i), Rules of Process and Procedure, Standards of Accreditation*).The July 31, 2017 TSR raises specific questions with regard to how the curriculum, course objectives, and learning materials aligned with the name and defined employment outcomes of the Cyber Security program. According to the school's response, upon consideration of the issue, Fortis-Centerville decided to review and revise the program, including changing the title to Network Administration and Security, and "redesigning seven (7) courses within the program to specifically target areas related to information technology with an emphasis on system and network security." ACCSC approved the modifications to the program in April 2018. According to the school's response to the TSR,

> *The College feels strongly that the modifications to the existing Cyber Security program and course redesign will provide the essential competency skills focusing on network administration and security. The modified Network Administration and Security program will better prepare our students in the job field with the opportunity to obtain multiple certifications and specifically focus skills related to employment in the computer systems and information analysis job market.*

The Commission is interested in further monitoring to ensure that students are adequately prepared by the revised curriculum to obtain the newly-defined educational objectives of the program. In addition, the Commission noted that Fortis-Centerville's response understandably focused on the revision of the program and preparation of students for employment. As graduation rates have also been below-benchmark, the Commission is also interested in more specific analysis with regard to the graduation rates in this program.

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

a. A statement of the revised educational objectives of the program, to include the name, nature, and level of occupation for which training is provided;

b.   An explanation of the specific revisions made to the program in order to align with the educational objectives outlined above;

c.   An analysis of the factors impacting the rates of student graduation (e.g., admissions requirements and student support) in the program, how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies;

d.   An **ACCSC Retention Chart** to show more recent data with regard to retention;

e.   A list of graduates from that program for the last six months and employment information, in the following format:

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

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.

7.   Fortis-Centerville must demonstrate that the school has adequate management and administrative capacity with the demonstrated ability to lead and manage a postsecondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). In addition, the school must ensure the continuity of management and administrative capacity through the reasonable retention of management and administrative staff (*Section I (A)(4), Substantive Standards, Standards of Accreditation*). The July 31, 2017 TSR notes that since the submission of the school's Self-Evaluation Report in December 2016, the school replaced the Campus Director and the Dean of Education and that 48% (27 of 56) of current staff members were new to their roles, with a hire date of 2016 or later. The Commission considered the overall performance of the institution, particularly in regard to student achievement outcomes and the lack of success of the distance education programs and questions whether the school is adequately managed.

Based on the foregoing, the Commission directs the school to submit the following:[2]

a.   Describe how the school is managed (including campus-based and corporate oversight) and how this system effectively ensures that the school meets its objectives, fulfills its obligations to students, and meets or exceeds accrediting standards on an ongoing basis;

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

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

c.   The school's most recent assessment regarding the retention of the management and administrative staff and a description of the strategies that the school has implemented to improve retention of management and administration staff; and

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[2] The Commission will take the totality of the school's response to this Warning Order into consideration when evaluating the ability of the school's managers to lead and manage a postsecondary institution in compliance with accrediting standards.

d. A description of the corporate involvement in management at the campus level, the level of oversight and monitoring provided by corporate staff, and the strategies employed by corporate-level management do to ensure continuity of management at the campus.

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<u>Warning Restrictions:</u>

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

<u>Notification to Students:</u>

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(8) Rules of Process and Procedure, Standards of Accreditation*).

<u>Response Requirements:</u>

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.

Fortis-Centerville 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.[3] 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.

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

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

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[3] 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.

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,[4] 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 ███████████████████████████████████. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact ████████████████████████ or via e-mail at ██████████████.

Sincerely,
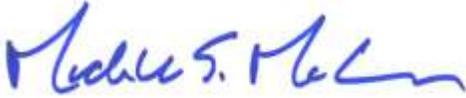
Michale S. McComis, Ed.D.
Executive Director

c: ████████████████
          ████████████████

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[4] ACCSC assesses a $500 processing fee to a school placed on Warning.