

September 10, 2018

ELECTRONIC DELIVERY

██████████
Campus President
Fortis Institute
166 Slocum St.
Forty Fort, Pennsylvania 18704

School #M068505
Warning

Dear ██████████

At the February 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to defer final action on the Application for Renewal of Accreditation and the Application for a Change of Location submitted by Fortis Institute located in Forty Fort, Pennsylvania. Upon review of the September 15, 2017 Commission letter the school’s response to that letter, the supplemental Annual Report student achievement information, the September 25, 2017 Team Summary Report (“TSR”) and the school’s response, the Commission voted to place Fortis-Forty-Fort on **Warning** with a subsequent review scheduled for ACCSC’s February 2019 meeting. The reasons for the Commission’s decision and the Commission’s requirements for Fortis Institute to demonstrate compliance are set forth below.

History of the Commission’s Review

At the August 2016 meeting, the Commission considered the school’s Application for Renewal of Accreditation and voted to defer final action in order to afford the school an additional opportunity to demonstrate compliance with accrediting standards in regards to student achievement outcomes rates, employment classifications, alignment of program objectives with employment outcomes, and program length.

At the February 2017 meeting, the Commission considered the previous decision to defer final action on the school’s Application for Renewal of Accreditation and again voted to defer final action in order to afford the school an additional opportunity to demonstrate compliance with accrediting standards in regards to student achievement outcomes rates, alignment of program objectives with employment outcomes, and program length.

February 2018

1. Fortis Institute 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 Institute. The school is currently approved to offer eight programs, offered in 10 reportable schedules. The school reported below-benchmark rates of graduation and/or employment for 3 of the 8 programs with the Outcomes Report, 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
Class A CDL Driving (Diploma)*	1	100%	84%	0%	70%
Commercial Truck Driver Training (Diploma)	6	66%	73%	95%	70%
ECG/Phlebotomy Lab Asst. (Diploma)	8	79%	60%	89%	70%
	12	100%	55%	75%	70%
Electrical Trades (Diploma)	10	85%	55%	95%	70%
Heating, Ventilation, Air Conditioning and Refrigeration (Diploma)	10	70%	55%	80%	70%
	19**	33%	43%	N/A	70%
Massage Therapist (Diploma)	8	88%	60%	100%	70%
Medical Assistant (Diploma)	8	67%	60%	90%	70%
	12	0%	55%	N/A	70%
Medical Assistant Technician (AST)	15	53%	50%	89%	70%
	26	40%	40%	100%	70%

* The school's response indicates that this program will be discontinued.

** The school has discontinued this schedule.

Class A CDL Driving (Diploma)

The Class A CDL Driving program was approved in 2012 and the school reported the first student achievement outcomes with the 2014 Annual Report. The student achievement rates reported via the Annual Reports since that time shows that the rates of student achievement are subject to a wide range of variance due to the small numbers of enrollments each year.

Class A CDL Driving (Diploma) 1-month					
Annual Report	Graduation Rate	Graduation Rate Benchmark	Employment Rate	Employment Rate Benchmark	Number of starts
2017	100%	84%	0%	70%	2
2016	80%	84%	100%	70%	5
2015	83%	84%	100%	68%	6
2014	100%	84%	0%	68%	1
2013	No starts during the reporting period				

The school's Outcomes Report includes an updated Graduation and Employment Chart, prepared using a December 2017 Report Date. Due to the overlapping reporting periods, the updated chart captures the same class of two students as was included in the 2017 Annual Report; therefore, there is no updated data upon which to make a determination about the success of the program. The school stated "[w]ith no new enrollment or graduates expected in the program it has been determined that this program is not sustainable due non-enrollment." Therefore, the school must submit a "Notice of Discontinued Programs" form to officially discontinue the program.

Commercial Truck Driver Training (Diploma)

This program was approved in October 2012 as Advanced Tractor Trailer Driving and modified to the current name in October 2015. The school reported the first student achievement outcomes with the 2014 Annual Report.

Commercial Truck Driver Training (Diploma)				
6 month				
Annual Report	Graduation Rate	Graduation Rate Benchmark	Employment Rate	Employment Rate Benchmark
2017	66%	73%	95%	70%
2016	69%	73%	93%	70%
2015	74%	73%	95%	68%
2014	79%	73%	95%	68%
2013	No Starts In The Reporting Period			

With the Outcomes Report, the school submitted an updated Graduation and Employment Chart prepared using a December 2017 Report Date, reporting a below-benchmark graduation rate of 58% and an above-benchmark employment rate of 87%. The school’s response outlines the measures that the school has undertaken to improve graduation rates, as follows:

- Enhanced intervention with students who are at a risk of not completing to help them achieve their goals;
- Instructors contacting students who miss class to determine if the situation can be remedied;
- Instructors monitoring and advising students who are having attendance issues;
- The Program Director and instructors working with students to offer options to make up class; and
- Implementation of two peer support programs: the Student Buddy System provides students with a better introduction to the school at the beginning of their studies; and the Student Ambassador Program that continues the peer support throughout the program, including the formation of a tutoring group for several classes that often present academic challenges to students.

The school provided an additional Graduation and Employment Chart, prepared using a July 2018 Report Date, reporting a graduation rate of 73%, which meets the benchmark for programs of comparable length. Therefore, it appears that with the 2018 Annual Report, the school’s efforts to improvement the graduation rate will show success. Therefore, the Commission is interested in monitoring the 2018 Annual Report to ensure that the improvements are reflected in the reported rates of student achievement.

Heating, Ventilation, Air Conditioning and Refrigeration (19-month, Diploma)

The Commission reviewed the following rates of student achievement reported over the last five years for the 19-month schedule:

Heating, Ventilation, Air Conditioning and Refrigeration (AAS) 19-month				
Annual Report	Graduation Rate	Graduation Rate Benchmark	Employment Rate	Employment Rate Benchmark
2017	33%	43%	0%	70%
2016	42%	43%	100%	70%
2015	50%	42%	50%	68%
2014	50%	42%	0%	68%
2013	69%	36%	89%	66%

The school’s Outcomes Report includes an updated Graduation and Employment Chart, prepared using a December 2017 Report Date. Due to the overlapping reporting periods, the updated chart captures the same class of two students as was included in the 2017 Annual Report; therefore, there is no updated data upon which to make a determination about the success of the program. The school also stated the following:

The Heating, Ventilation, Air Conditioning and Refrigeration 19-month Diploma Programs, consists of the same cohort previously reported on in Exhibit 2 of the 2016 Deferral Response, hence the same outcomes results for both graduation and employment rates. It was determined at the time that the evening (19-month) HVAC Program was no longer sustainable and we then discontinued enrolling into the 19-month version. The last student in the program started on March 21, 2016 and graduated on December 23, 2016. The institution will continue to run the HVAC 10-month Diploma version during the day as it better serves our current population.

The Commission concurs with the school’s decision to discontinue the 19-month schedule of the Heating, Ventilation, Air Conditioning and Refrigeration program and as there are no students remaining, additional monitoring is not warranted at this time. It is the Commission’s expectation that the school would only begin a longer schedule of this program in the future after rigorous consideration and demonstrating the ability to maintain acceptable rates of student achievement throughout the institution’s other programmatic offerings.

Medical Assisting (Diploma)

In addition to the below-benchmark rate of student graduation reported with the 2017 Annual Report, the Commission reviewed the following rates of student achievement reported over the last five years for the 12-month schedule of this program:

Medical Assisting (Diploma) 12-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	0%	55%	N/A	70%
2016	80%	55%	100%	70%
2015	50%	55%	100%	68%
2014	53%	55%	80%	68%

2013	55%	54%	67%	66%
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The school’s Outcomes Report includes an updated Graduation and Employment Chart, prepared using a December 2017 Report Date, reporting an above-benchmark student graduation rate of 56% and a below-benchmark rate of 60%. The Commission noted that the strong improvement in the graduation rate and that, historically, the employment rates have been above benchmark. The school also stated the following:

The Medical Assistant 12-month Diploma program came in below benchmark in Employment Rate for the December 2017 reporting period, with 5 eligible graduates and 3 working in field. Of the two remaining graduates, one is working in a related field and the other is still interviewing and is expected to be verified employed by January 2018 bring us up above benchmark for this reporting period to 80%.

The Commission is interested in further monitoring of this program to determine that the rates of graduation and employment reported in the 2018 Annual Report meet or exceed ACCSC’s benchmarks. If the employment rates do not show improvement, the Commission expects Fortis Institute to conduct a more thorough analysis of the factor impacting the employment rates in this program. In addition, with the graduation rates improving to one percentage point above the benchmark, the Commission expects Fortis Institute to continue striving to improve student success in this area.

Medical Assistant Technician (AST)

In addition to the below-benchmark rate of student graduation reported with the 2016 Annual Report, the Commission reviewed the following rates of student achievement reported over the last five years for the 26-month schedule of this program:

Medical Assistant Technician (AST)				
26-month				
Annual Report	Graduation	Graduation Rate Benchmark	Employment	Employment Rate Benchmark
2017	40%	40%	100%	70%
2016	25%	40%	100%	70%
2015	0%	36%	N/A	68%
2014	39%	36%	80%	68%
2013	33%	36%	100%	66%

The school’s Outcomes Report includes an updated Graduation and Employment Chart, prepared using a December 2017 Report Date, reporting above-benchmark rates of student graduation and employment of 40% rate of 56% and a below-benchmark rate of 60%. The school also stated the following:

An analysis of the sustainability of the Medical Assistant Technician 26-month program version reflected that the program has seen a steady increase in enrollments and completion in the last two years. The 26-month version of the program runs solely in the evening. Evening programs for our institution traditionally engage working students who need the flexibility of evening hours to complement their work schedule. While in the school’s previous response we stated that low outcomes were in part due to low enrollment cohort size; analysis shows that low enrollment was due to the high unemployment rate in our area at that time. The unemployment rate for the Wilkes-Barre Metro area which includes Forty Fort for the 2013-2014 time-period

was reported by the BLS to average about 10%. The current unemployment rate for the same area is averaging about 5%. As the unemployment rate decreased, we saw an increase in interest in the 26-Month version of this program. We currently have 8 students enrolled in the program as compared to two active students in 2015, and have sufficient instructors, materials and support in the evening hours to continue the program.

Give the history of poor performance of the 26-month schedule of this program in particular, and the school’s ongoing struggles to demonstrate student success in evening schedules of other programs (Heating, Ventilation, Air Conditioning and Refrigeration, Electrical Trades, Medical Assistant), the Commission is interested in additional monitoring of student achievement in the 26-month evening schedule of this program.

Based on the foregoing, while the Commission recognized that the school has taken certain steps to improve student success, the Commission determined that additional monitoring of the 6-month Commercial Truck Driver Training (Diploma), 12-month Medical Assisting (Diploma), and the 26-month Medical Assistant Technician (AST) programs is warranted. Accordingly, the Commission directs the school to submit the following:

- a. A “Notice of Discontinued Programs” form to officially discontinue the Class A CDL Driving (Diploma) program.
- b. A Graduation and Employment Chart for the 6-month Commercial Truck Driver Training (Diploma), 12-month Medical Assisting (Diploma), and the 26-month Medical Assistant Technician (AST) programs, 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 for which the reported rates of student graduation and graduate employment 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.
- e. 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 Institute must demonstrate that employment classifications are directly related to the program from which the individual graduated and aligns with a majority of the educational and training objectives for the Medical Assistant Technician (AST) program (*Appendix VII, Substantive Standards, Standards of Accreditation*). At issue is whether there is sufficient alignment between employment outcomes and a majority of the educational and training objectives of the Medical Assistant Technician (AST) program. The history of the Commission’s review of this matter began with the March 18, 2016 TSR, which raises questions with regard to employment classifications for the Medical Assisting (Diploma) and Medical Assistant Technician (AST) programs. Specifically, the school had not demonstrated that positions such as “Nurse Assistant,” “File Clerk,” and “Patient Care Assistant” require a majority of the educational and training objectives of either program. The September 14, 2016 deferral letter also raises the question with regard to the similarity between the educational objectives of the degree program and the diploma program offered by Fortis Institute. The Commission stated the following:

The response and catalog descriptions do not make clear the benefit of the additional investment of time and money for the 1500 hour degree program versus the 730 hour diploma program, when it seems employment outcomes are largely the same for both programs (both intended and actual outcomes). The Commission is interested in ensuring that the school manages student expectations during enrollment such that students understand the outcomes of the degree program and investment of time and money for this 1500 hour program. Moreover, the school has classified graduates of the Medical Assistant Technician AST Degree program who are employed as Phlebotomists as being employed in a training related field, when such positions can typically be obtained by individuals who have completed much shorter, and less expensive, Phlebotomy programs.

The September 15, 2017 letter regarding the subsequent deferral of the matter directed Fortis Institute to provide a side-by-side comparison of the program content for the two programs in order to differentiate between the skills acquired in the degree program and the diploma program, the Commission. The course listing provided in the response shows that the two programs have 14 courses in common and the degree program includes 17 additional courses: Billing, Business Software, Insurance Techniques/Coding, Medical Law and Ethics, Medical Terminology, Principles of Phlebotomy, Cardiac Specialties, Pathology, Lab Procedures, Health Unit Coordination, Cardiac Interpretation, Study of Maturity, and five general education courses. The Commission found that there is a significant additional coursework required for the degree, which should result in clearly differentiated occupational outcomes.

With the September 14, 2016 deferral letter, the Commission afforded Fortis Institute the opportunity to evaluate and revise the stated educational objectives of the program. In response, the school stated, “Fortis Institute has elected to not change the MAT degree or MA diploma program objectives at this time.” The Commission advised the school in the subsequent deferral letter dated September 15, 2017, that

The Commission found that defining fulfillment of the objectives of the 78.5 semester hour AST degree program titled “Medical Assistant Technician” to include preparation for positions as Phlebotomists, ECG Technicians, Home Health Aides, Nurse Aides, Health Unit Coordinators, and Medical Transcriptionists raises significant questions for the Commission regarding the appropriateness of this program as approved...

Those questions included whether the program name aligns with the educational objectives, whether program length aligns with program objectives, and whether advertising avoids leaving a misleading impression with regard to the outcome of the Medical Assisting (Diploma) and Medical Assistant Technician (Diploma). In addition, the Commission stated its position that jobs such as “Phlebotomists,” “ECG Technicians,” “Home Health Aide,” “Nurse Aides,” “Health Unit Coordinators,” and “Medical Transcriptionist” do not constitute in-field placements for graduates of a specialized, 78.5 semester credit hour 15-month long Medical Assistant Technician (AST) program. Therefore, the Commission directed Fortis Institute to revise the educational objectives of the degree program accordingly. In response, the school provided the following revised educational objective of the Medical Assistant Technician (AST) program:

Medical Assistants play an integral part in performing administrative and clinical tasks that support the work of physicians and other healthcare professionals. With changes in the healthcare industry, the need for well-trained allied health professionals has grown significantly. The objective of the Medical Assistant Technician program is to provide training for those who wish to work in the clinical and administrative areas of health care and enable students to gain knowledge and skills necessary for employment in a healthcare setting.

The Commission noted that specific job titles have been removed from the description to the extent that the revised educational objective is too vague and does not provide the name, nature, and level of occupation for which training is provided. The statement does not include a description of any enhanced or differentiated benefit based on acquiring the skills in the 17 additional courses that are included in the degree program. The Commission found that the school has yet to adequately define student success in the Medical Assistant Technology (AST) program. The Commission also directed Fortis Forty-Fort to submit a copy of the catalog and the school’s website to show the differentiation in how the educational objectives for the Medical Assisting (Diploma) and the Medical Assistant Technician

(AST) programs are represented to prospective students. The Commission noted that the two descriptions in the catalog are virtually identical and do not reflect a difference in outcomes that would warrant the length of the Medical Assistant Technician (AST) program.

<p align="center">Medical Assisting (Diploma) 730 clock hours, 35 semester credits 30 weeks (day schedule)</p>	<p align="center">Medical Assistant Technician (AST) 1500 clock hours, 77.5 semester credits 60 weeks (day schedule)</p>
<p>Objective Medical Assistants play an integral part in performing administrative and clinical tasks that supports the work of physicians and other healthcare professionals. With changes in the healthcare industry, the need for well-trained Medical Assistants has grown significantly. The objective of the Medical Assisting program is to provide training for those who wish to work in the clinical and administrative areas of health care and enable students to gain knowledge and skills necessary for entry-level employment in a healthcare setting.</p> <p>Description The Medical Assisting program includes administrative and clinical competencies expected for entry-level positions in a health care setting. Students develop skills in front office administration with an introduction to health insurance and basic billing practices. The back office portion focuses on direct patient contact and typical clinical and laboratory skills, such as minor clinical procedures, EKG, phlebotomy, injections, and lab screenings. Students also learn to observe Universal Precautions, OSHA regulations, HIPAA requirements, confidentiality, and the legal aspects applicable to any allied health environment. Duties of medical assistants vary from office to office depending on office location, size, and specialty. In small practices, medical assistants are usually "generalists," handling both administrative and clinical duties. They report directly to an office manager, physician, or other health practitioner. Those in large practices tend to specialize in a particular area under the supervision of a department administrator/practice manager.</p>	<p>Objective Medical Assistants play an integral part in performing administrative and clinical tasks that supports support the work of physicians and other healthcare professionals. With changes in the healthcare industry, the need for well-trained allied health professionals has grown significantly. The objective of the Medical Assistant Technician program is to provide training for those who wish to work in the clinical and administrative areas of health care and enable students to gain knowledge and skills necessary for entry-level employment in a healthcare setting.</p> <p>Description The Medical Assistant Technician program includes administrative and clinical competencies expected for entry-level positions in a health care setting. Students develop skills in front office administration with an introduction to health insurance and basic billing practices. The back office portion focuses on direct patient contact and typical clinical and laboratory skills, such as minor clinical procedures, EKG, phlebotomy, injections, and lab screenings. Students also learn to observe Universal Precautions, OSHA regulations, HIPAA requirements, confidentiality, and the legal aspects applicable to any allied health environment. Duties of medical assistants vary from office to office depending on office location, size, and specialty. In small practices, medical assistants are usually "generalists," handling both administrative and clinical duties. They report directly to an office manager, physician, or other health practitioner. Those in large practices tend to specialize in a particular area under the supervision of a department administrator/practice manager.</p>

In order to evaluate how Fortis Institute makes the determination as to whether an employment position can be categorized as “employed in field” for the Medical Assistant Technician (AST) degree program, the Commission directed Fortis Forty-Fort to submit the rubric used by the school to analyze the connection between the skills obtained through the training and the skills required for the employment position. The school provided a worksheet with the following statements, to which the school representative indicates “met” or “not met”:

- Position aligns with a majority of the objectives of the program, to include administrative and/or clinical tasks supporting physicians and other healthcare professionals;
- Graduate has been employed for 5 consecutive days and position is considered regular by the employer;
- Performing administrative tasks that support the work of physicians and other healthcare professionals;
- Performing clinical tasks that support the work of physicians and other healthcare professionals;
- Employment in a healthcare setting; and
- Position meets minimum federal, state, and local compensation requirements

The Commission found that the school indicating that a requirement was “met” does not provide documentation to support the determination. The Commission is interested in the list of skills acquired in this program, and how the school evaluates the skills used in the employment position against the list of skills acquired in the training to make sure that the position aligns with a majority of the educational and training objectives of the program.

Finally, the Commission directed Fortis Institute to provide a list of the ten most recent graduates from the Medical Assistant Technician (AST) program and the ten most recent graduates from the Medical Assisting (Diploma) program that have been categorized as employed in field, and documentation to show that employment classifications can be justified. The school provided a list of ten graduates of the Medical Assisting (Diploma) program that are all employed as Medical Assistants, which appears to be justified. Eight of the ten graduates of the Medical Assistant Technician (AST) program are identified as Medical Assistants; however, the documentation does not show that there is any differentiation in the employment outcomes between the graduates of the diploma and the graduates of the degree program. In addition, one graduate of the degree program is classified as employed in field as a “Donor Processor” and one as a “Medical Front Desk.” The documentation provided by the school includes the Employment Verification form, which lists the responsibilities for Donor Processor as “(medical asst.) determine donor suitability through screening and testing, handling specimens, maintaining donor records.” With regard to the Medical Front Desk, the Employment Verification form lists the responsibilities as “schedule all patient appointments, medical records, insurance.” The response includes a “MAT Placement Rubric” for each graduate, which indicates that the criteria “[p]osition aligns with a majority of the objectives of the program, to include administrative and/or clinical tasks supporting physicians and other healthcare professionals” was met, but there is no documentation to support either claim.

Overall, the Commission found that Fortis Forty Fort has not taken sufficient action to define the educational objectives of the Medical Assistant Technician (AST) program as differentiated from the Medical Assisting (Diploma) program, or to show that the program is justified in terms of enhanced employment opportunities for graduates. It is imperative that Fortis Institute take immediate and definitive action to revise the educational objectives and to secure documentation that shows that the graduates from the degree program obtain those enhanced outcomes.

Based on the foregoing, the Commission directed Fortis Institute to submit the following:

- a. A copy of the revised educational objectives for the Medical Assistant Technician (AST) program, differentiating the outcomes of the degree program from the diploma program;
- b. An excerpt from the catalog and the website demonstrating that the objectives for the Medical Assistant Technician (AST) and Medical Assisting (Diploma) are advertised and promoted as described above;
- c. An explanation of the rubric used by the school to determine whether a position can be classified as “in-field” employment Medical Assistant Technician (AST), including the rubric for analyzing the connection between skills obtained through training and skills required for the position; and
- d. A list of the ten most recent graduates from the Medical Assistant Technician (AST) program and the ten most recent graduates from the Medical Assisting (Diploma) program that have been categorized as employed in field, in the format of the following table. For any position that is not clearly medical assisting, the school must provide supporting documentation with regard to how the school applied the rubric described in item (d) above).

Graduate ID	Program	Start Date	Employer Name, Address, & Phone #	Employer Point of Contact	Date of Employment	Descriptive Job Title

3. Fortis Institute must demonstrate that the program length of the ECG/Phlebotomy/Lab Assistant (Diploma) program is appropriate for the employment outcomes and is not too long in relation to program objectives (*Section II (A)(4)(b), Substantive Standards, Standards of Accreditation*). At issue is the employment outcome of the ECG/Phlebotomy/Lab Assistant (Diploma) program for graduates appears to be limited to becoming a Phlebotomist. In that case, the program is mis-named as ECG/Phlebotomy/Lab Assistant and at 730 clock hours and 34 semester credit hours is too long in relation to preparation as a Phlebotomist. The school has yet to show that graduates of the ECG/Phlebotomy/Lab Assistant program have improved employment opportunities and ultimately advance in their field to demonstrate that the program length is appropriate to the program objectives.

According to the school’s response, Fortis Institute instituted a “Program Review Model” that was implemented in October 2017 with the ECG/Phlebotomy & Lab Assistant program. The result of the program review is stated in the response as follows:

The main change comes in consolidating some the office aspects of the current course, removing coursework related to ECG, Cardiac Specialties and Pharmacology as the majority of our graduates and employers do not require these skills, and incorporating Medical Terminology to increase understanding in the science required for the skills of a Phlebotomist and Lab Assistant. Additionally, the externship portion of the program would be reduced in hours in keeping with the new length of the program. Fortis Institute is presently preparing a modification application for submission to and approval by Pennsylvania prior to submission to ACCSC.

The Commission noted that the proposed program title is “Phlebotomy and Lab Assisting,” which appears to be much more reflective of the program content and employment outcomes of the program. The revised program would be comprised of 525 clock hours and 24.5 semester credit hours. The Commission recognized the school’s efforts to review and revise the program and as such is interested

in further explanation of the intended changes, particularly with regard to the alignment of the program title, program objectives, and employment classifications. Accordingly, the Commission directs the school to submit the following:

- a. A statement of the educational objectives of the revised program that specifically describes the name, nature and level of occupation for which training is provided;
- b. An excerpt from the catalog and the website, demonstrating that the revised program is accurately represented to prospective students;
- c. An explanation of the rubric used by the school to determine whether a position can be classified as “in-field” employment for the revised program, including the rubric for analyzing the connection between skills obtained through training and skills required for the position; 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.

Warning Restrictions:

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

Notification to Students

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*).

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.

Fortis-Forty-Fort 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.¹ 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-Forty-Fort 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

¹ 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.

by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

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

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before December 21, 2018**. If a response, the required fee,² 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 further assistance or additional information, please contact [REDACTED] or via e-mail at [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]
[REDACTED]

² ACCSC assesses a \$500 processing fee to a school placed on Warning.