

October 28, 2019

ELECTRONIC DELIVERY

██████████
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***System-Wide Review
Continued Probation Order***

Dear ██████████

At the August 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the following:

- The previous decision to place the system of schools in the Center for Excellence in Higher Education (“CEHE”) on Probation, along with other matters (see Appendix I included as part of this letter for a list of institutions, actions, and materials considered).
- CEHE’s response to ACCSC’s letter of July 11, 2019, requesting additional information with regard to a notice that CEHE had received a Civil Investigative Demand (“CID”) from the Consumer Finance Protection Bureau (“CFPB”).

On September 11, 2019, CEHE provided ACCSC with notification that the schools have stopped enrolling students in residential programs at most CEHE campuses. CEHE indicated that the schools will continue to operate and that “onground campuses will continue to provide the education, services, and support to currently enrolled students and every current student will be able to complete their degree programs, without interruption, all the way through to graduation.”

At the September 2019 meeting, the Commission reconsidered its decision in context of the September 11, 2019 notification. The Commission voted to continue the system of CEHE-affiliated schools on Probation, with a review of additional material regarding the transition of the schools from residential instruction to distance education delivery scheduled for February 2020 and a review of the Commission’s findings scheduled for May 2020.

The Commission’s action is effective as of the date of this letter. The institutions covered by the Commission’s action are listed below:

- California College San Diego (“CCSD”) – San Diego, California (#M001073/SL460488-National City, California)
 - California College San Diego (“CCSD-San Marcos”)– San Marcos, California (#B072374)
- CollegeAmerica (“CA-Denver”) – Denver, Colorado (#M001507)
 - CollegeAmerica (“CA-Fort Collins”) – Fort Collins, Colorado (#B070544)
 - CollegeAmerica (“CA-Colorado Springs”) – Colorado Springs, Colorado (#B070623)
- CollegeAmerica (“CA-Flagstaff”) – Flagstaff, Arizona (#M070742)
 - CollegeAmerica (“CA-Phoenix”) – Phoenix, Arizona (#B070743)
- Stevens-Henager College (“SHC-Idaho Falls”) – Idaho (#B072351)
- Stevens-Henager College (“SHC-West Haven”) – West Haven, Utah (#M070581)
 - Stevens-Henager College (“SHC-Orem”) – Orem, Utah (#B070582)
 - Stevens-Henager College (“SHC-Murray”) – Murray, Utah (#B070583)
 - Stevens-Henager College (“SHC-Logan”) – Logan, Utah (#B070584)

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

SUMMARY OF THE COMMISSION’S REVIEW

As a result of the August 2019 review, the Commission found that the schools had made strides in demonstrating compliance with accrediting standards, providing documentation that addressed the Commission’s questions in the following areas:

- Employment classifications
- Objectives of the Healthcare Administration (BS) program,
- Transfer of credits policies
- Course prerequisites
- Allowable credit hours attempted per module
- Compliance with BPPE requirements regarding the enrollment agreement; and
- Status with the Commission on Respiratory Therapy Commission

Although the schools were able to address a significant number of the questions raised in the May 2, 2019 Probation Order, there are still a number of issues that remain in question. The Commission determined that the response does not include sufficient information and documentation to address the questions raised with regard to advertising, assessment of prospective students for distance education programs, independent study, international students, the attendance policy, and the way in which CCSD-San Diego is equipped for the Computer Programming (AAS), Computer Technology & Networking (AAS), and Computer Science (BS) program.

Finally, as a result of the August 2019 review, the Commission raised two questions with regard to the school system’s compliance with fundamental tenets of ACCSC’s accreditation process: student achievement outcomes and the integrity of information provided by the schools. With regard to student achievement, the Commission noted the magnitude of the programs that are failing to demonstrate successful student achievement at some of the schools in CEHE’s system, most notably Independence University, California College-San Diego, and CollegeAmerica in Phoenix. In addition, the schools’ submissions with regard to enrollment agreements call into question whether CEHE has provided accurate and reliable information to the Commission.

With regard to student success, the Commission noted that 7 of the 15 affiliated schools reported above-benchmark rates for all programs, and that the remaining 8 schools reported below-benchmark rates of student achievement for at least one program. Two of those schools are reporting below benchmark rates for fewer than 50% of the schools’ active reportable programs; however, there are six schools reporting below benchmark rates for at least half of the active reportable programs. It is not clear that those six schools have addressed the underlying problem impacting student success.

With regard to the enrollment agreements, the Commission found that documentation included with the response to the May 2, 2019 Probation Order shows that CEHE has not implemented the revisions as claimed in the December 2018 response. A high level of reliance is placed upon information, data, and statements provided to the Commission by a school, and the integrity and honesty of a school are fundamental and critical to the process. If the Commission determines that a school has knowingly provided false or misleading information, the Commission will take any action that it believes is reasonable and

appropriate including, but not limited to, denying any pending application or taking any accreditation action described in *Section VII, Rules of Process and Procedure, Standards of Accreditation*.

SEPTEMBER 11, 2019 ANNOUNCEMENT

The Commission reviewed the September 11, 2019 letter from [REDACTED] which states that effective September 10, 2019, all of CEHE’s campuses, with the exception of Stevens-Henager College in West Haven, Utah, will suspend enrolling new students into campus-based residential programs. [REDACTED] also stated:

I want to be clear that CEHE is not closing any campuses. All of our onground campuses will continue to provide the education, services, and support to currently enrolled students and every current student will be able to complete their degree programs, without interruption, all the way through to graduation. Aside from admissions personnel, we are not laying off any employees at our ground campuses.

Although the schools will remain open, the shift away from residential programs to distance education delivery represents a significant transition in the fundamental nature of the institutions. The Commission determined that additional information and monitoring is warranted with regard to CEHE’s plans for a successful transition and the safeguards provided for currently enrolled students as well as new online students enrolled during the change.

The Commission also noted that the announcement states:

The only effect of this strategic decision on current students is that if a current student subsequently withdrawals or is terminated, the campus may not be able to accommodate that student if they want to “re-enroll” sometime in the future. However, in most cases, if one of our current onground students withdrawals in the future and then wants to re-enroll – we will likely be able to accommodate them through Independence University [via Distance Education].

The letter also includes a copy of the notice provided to students which indicates that the transition of all degree programs to fully online delivery will take place over the next 3-4 years. The notice also states that, “...all current students, including those who have just recently started, will be able to complete their program through the campus as scheduled.*” The asterisk is linked to the following statement “Current students will still be required to take hybrid courses and, periodically, fully online courses as part of completing their current degree programs.”

It appears that current students who enrolled in a residential program may be required to take some courses via distance education in order to complete their programs. While the statement indicates that students will “still” be required to complete distance education courses, the information does not make clear whether students were aware of and agreed to this at the time of enrollment or if this will be new to the students as part of the school’s teach-out plan. The Commission notes the potential for a negative impact of this change in delivery methods on the success of students that are not interested in or equipped to learn in an online environment. Also, considering the length of the teach-out/transition period and therefore the amount of education and time that the residential programs will need to operate to complete the teach-out without enrolling new students, CEHE must demonstrate that the schools have the capacity and commitment to complete the education of all currently enrolled students even as the student population and class size becomes significantly smaller but faculty needs remain.

The Commission has been monitoring the school’s compliance specifically with regard to the policies and procedures for the admission and education of international students. As established previously, international students may not enroll in programs offered exclusively via distance education methods. Therefore, it appears

that CEHE-affiliated schools will no longer be eligible to enroll new international students. The Commission is interested, however, in how the teach-out plan will adequately address and fulfill obligations to currently enrolled international students.

In accordance with *Section IV (F)(1)(a) Rules of Process and Procedure, Standards of Accreditation*, the Commission requires a school to submit a complete [ACCSC Institutional Teach-Out Plan Approval Form](#) when a school intends to close. The Commission is interested in ensuring that students are fully aware of all options available to them and that the schools proceed with teach-out arrangements that are in the students' best interest.

The Commission directs CEHE to provide an updated ACCSC Institutional Teach-Out Plan Approval Form for each school. Please use the most updated version of the form, dated 2019, of the ACCSC Institutional Teach-Out Plan Approval Form on the Commission's website. Given the Probation status and length of the programs and therefore the teach-out period, as part of and in addition to the requirements in the above teach-out plan form, the Commission directs the schools to submit the following:

- a. The schools must show individualized education plans for all students to demonstrate an equitable pathway for each. Therefore the Commission directs CEHE to submit a list of all students by campus by program and the education plan for each.
- b. A list of all international students, an explanation as to how the cessation of residential instruction will affect those students, and CEHE's plan to address those consequences;
- c. An explanation as to when and what circumstances would require current students to take hybrid courses and, periodically, fully online courses as part of completing their current degree programs.
- d. If taking hybrid or fully online courses is a new component not already agreed to by the student during enrollment, a description of CEHE's policies and procedures for assisting residential students who must utilize a distance education format, including the following:
 - i. The method that CEHE will use to assess the student's technical skills, competencies, and access to technology necessary to succeed in a distance education environment prior to requiring them to complete hybrid/fully online coursework.
 - ii. An assessment of the student's capability to benefit from a distance education program. The school must utilize an assessment tool (e.g., test, preparation/ orientation course, etc.) to determine if the student's learning style is conducive to online learning.
 - iii. The alternate options that will be made available to students that do not demonstrate the technical skills, competencies, and access to technology necessary to succeed, or a learning style that is conducive to online learning.
- e. A detailed plan for retaining sufficient residential staff and faculty through the entire teach-out period for every program and every campus.

Prior to enumerating the findings of non-compliance to which the school must respond, the Commission will address the following question which appears as part of the schools' responses, as follows:

Before responding to each of the items in this section, CEHE would like to make a general observation and ask a question of the Commission regarding this item. CEHE is confused and does not understand the Commission's addition of this item to the Commission's System-Wide Probation Order. This item, nor anything similar or related to this item, was included in the 18 items identified as areas of concern in the Commission's September 6, 2018 System-Wide Probation Order.

This item is specific to CEHE's California College San Diego campus in San Marcos. As noted in the Commission's May 2, 2019 Continued System-Wide Probation letter, this item was part of the October 17, 2018 Team Summary Report ("TSR") for the San Marcos campus. The San Marcos campus provided its response to the October 17, 2018 TSR on January 3, 2019 and the campus has never received any response from the Commission. We are confused as to why the Commission is adding an item specific to a single campus, from a specific re-accreditation visit, to a System-Wide Probation Order for CEHE. Could the Commission help us understand why this item was added as part of CEHE's system-wide probation order?

The purpose of the inclusion of the questioned items in the Commission's system-wide action is three-fold. First, once a system-wide action has been taken, rather than issuing multiple letters with regard to individual schools, it is the Commission's practice to group as many outstanding compliance issues into a single letter for the purposes of streamlining the schools' responses and the Commission's review of the response material. Second, the incorporation of all items of non-compliance is conducive to assessment of the system as a whole. Although the Commission does not accredit corporations, similarities and differences in compliance issues may show whether managerial weaknesses exist at the corporate or campus level. Third, because the policy at one school may apply to all campuses, a question raised at one campus may become a question raised at all campuses.

COMMISSION FINDINGS

1. CEHE must demonstrate successful student achievement, including acceptable rates of student graduation and graduate employment in the career field for which the schools provide education, in the schools' active programs (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). With the May 2, 2019 letter, the Commission conveyed the expectation that CEHE's efforts to make fundamental changes to the way in which the campuses are managed should result in improved student achievement outcomes. At that juncture, a review of student achievement data reported in the 2016, 2017, and 2018 Annual Reports, as well as the more recent data provided in CEHE's response indicate that CEHE's strategies have had mixed results in terms of improving student achievement. As a result, the Commission directed the following:
 - Cessation of enrollment in 10 programs offered at four CEHE-affiliated schools that reported three consecutive years of below-benchmark rates of student graduation and/or graduate employment; and
 - Updated student achievement data for 30 programs at eight CEHE-affiliated schools that reported below-benchmark rates of student achievement with the most recent report date.

In response, CEHE provided a recapitulation of seven key actions taken by the schools over the past "year or two" to address student achievement. The stated actions include:

- *Implementation of the 5-credit model: CEHE rearranged the course and academic work in a given program so that students only have to take one course per module. According to the response, the initial data for this strategy shows considerable efficacy in improving retention.*
- *Increased staffing: Based on an analysis of the "headcount" needed to provide the high levels of contact and engagement that CEHE has deemed necessary to improve both graduation rates and employment rates, CEHE implemented a revised staffing-model for its campuses.*
- *Accountability Metrics: CEHE has developed and implemented an entirely new metrics and accountability system for all academic and career services personnel.*

- *Elimination of Poor Performing Programs* Over the past two years, through its ongoing assessment of programs, outcomes, and viability, CEHE has discontinued over 52 programs throughout its system of colleges.
- *Program Modifications.* CEHE has made numerous revisions, modifications, and restructurings to programs. Over the past two years, CEHE has submitted at least 78 program modifications and 51 non-degree program applications.
- *Seeking Outside Assistance.* To augment the efficacy of analysis and strategies for improving student success, CEHE has launched a phased series of research and solution development projects with an outside research entity, Hanover Research. In March 2019, CEHE and Hanover completed a Phase I project to analyze the predictors of student retention, graduation, and employment after leaving CEHE.
- *Revised Assessment Plan for Prospective Students.* This item is discussed in more detail in our response to Item 7. In short, CEHE’s analysis has concluded that we need to revise and significantly upgrade the assessment policies, processes, and tools we leverage with prospective students. After careful examination of various options, CEHE has contracted with SmarterMeasure to implement a new assessment tool and process. This implementation will occur within the next month.

The Commission recognized the efforts that CEHE and the schools appear to be making in an effort to improve student achievement outcomes. The Commission noted with interest that CEHE enlisted an outside research entity, Hanover Research, to assist CEHE schools in analyzing the factors impacting student success, and to provide external feedback into the process of developing strategies tailored to addressing those factors. CEHE has also implemented new metrics and an accountability system for faculty and career services that establish the expected benchmarks for performance in the support of student success. The Commission recognizes the value of these types of efforts. As such, the Commission is interested in how CEHE has incorporated the information gleaned by the outside research entity into the schools’ assessment and improvement mechanisms. The Commission is also interested in how the new metrics support oversight and monitoring of the processes that support student success, and how faculty and career services staff are receiving and adapting to the new metrics and accountability system.

Another of the seven key factors is CEHE’s decision to significantly upgrade the assessment policies, processes, and tools for prospective students in the distance education learning environment. The recruitment and admissions processes have a tremendous impact on whether the school admits only those students who are capable of benefiting from the program, which in turn impacts whether the schools are able to adequately support student success given the capability of students and the educational resources available. This will be especially crucial, given the September 11, 2019 announcement that the schools will be transitioning to delivering programs exclusively via distance education. The Commission intends to review documentation of the implementation of the new assessment procedures, and evidence that the new policies, processes, and tools are effectively supporting student success. In addition, the response includes data indicating that the 5-credit model is having a positive impact on student persistence rates, which CEHE posited should result in improved graduation rates.

CEHE also pointed to the “numerous revisions, modifications, and restructurings to programs” as indicia of its improvement efforts and that “over the past two years, CEHE has submitted at least 78 program modifications and 51 non-degree program applications.” The Commission affirmed the importance of a systematic and evidence-based process to: evaluate curriculum and course content; assess the appropriateness of that coursework in relation to program objectives; assess program viability; and make curriculum revisions accordingly. Likewise, the response indicates that the schools

have discontinued a total of 52 “poor performing” programs throughout the system.¹ As such, CEHE’s response asks the Commission to consider the following:

Since virtually all of efforts to improve graduation rates will only impact current and future students (and these initiatives are showing positive results), we encourage the Commission to considering removing the cessation directive on those programs that were placed on cessation due to poor graduation rates. This would allow CEHE to bring new students into those programs and continue to measure and demonstrate the effectiveness of various improvement strategies. However, due to CEHE’s past challenges in achieving satisfactory graduation rates in some of its programs, coupled with some ongoing uncertainty around the effectiveness of multiple improvement strategies, CEHE is not advocating for the Commission to remove the cessation directive (for programs with a history of poor graduation rates) in its entirety. CEHE believes that a more prudent, appropriate, and conservative action would be to move the programs on cessation for poor graduation rates to a “capped enrollment” status. Under a “capped” status, CEHE could not grow or expand the population in programs that were previously under cessation until the data for current and future cohorts evidences satisfactory graduation rates.

The Commission considered CEHE’s request in context of the history of reported graduation rates and the more current data provided in the response. Independence University notified ACCSC that the Graphic Arts-DE (AAS), Healthcare Administration (MS), and Respiratory Therapy (AAS) programs are in teach-out. The student achievement rates for programs subject to the cease enroll action in the May 2, 2019 letter are outlined in Table 1.1. CEHE requested consideration of the “cessation directive on those programs that were placed on cessation due to poor graduation rates.” The two programs in this category are the Business (AAS) program at CA-Flagstaff (M070742) and the Business Administration (BS) program at SHC-Murray. CA-Flagstaff reported a significant decline in the rates of student graduation and graduate employment for the Business (AAS) program; therefore, the Commission determined to keep the cease enrollment directive in place pending review of updated information.

With regard to the Business Administration (BS) program at SHC-Murray (B070583), the Commission noted that the most recent rates of student graduation and graduate employment are reported to be above benchmarks.

Stevens-Henager College – Murray (B070583)								
	Graduation Rates				Employment Rates			
	2016	2017	2018	2019	2016	2017	2018	2019
Business Administration (BS)	19%	35%	32%	46%	100%	71%	75%	90%

At the August 2019 meeting, in recognition of the improved rates, the Commission voted to lift the cease enrollment directive and to impose an enrollment cap to afford the school an opportunity to implement and show the effectiveness of improvement strategies in controlled circumstances, particularly with regards to graduation rates. Therefore, the Commission determined to **cap enrollment** in the Business Administration (BS) program at SHC-Murray at a level not to exceed the program’s June 30, 2018 enrollment as reported in the 2018 ACCSC Annual Report².

¹ The Commission recognizes that a rigorous assessment process may result in a conclusion that a program is no longer viable. it is the Commission’s expectation that a school would take appropriate action with regard to such a conclusion, including discontinuing and teaching out non-viable programs.

² In the Program Enrollment Summary portion of the 2018 ACCSC Annual Report, SHC-Murray reported 18 students enrolled in the Business Administration (BS) program as of June 30, 2018.

Given that Independence University discontinued three of the programs under the May 2, 2019 cease enrollment directive, and the Commission acted to lift the cease enrollment directive for the Business Administration (BS) program at the SHC-Murray campus, the programs that remain on a cease enrollment directive are outlined in Table 1.1. The Commission determined to reconsider the cease enrollment directives at the next review.

Table 1.1

California College of San Diego (M001073)								
	Graduation Rates				Employment Rates			
	2016	2017	2018	2019	2016	2017	2018	2019
Business Administration (BS)	36%	41%	56%	56%	69%	67%	50%	63%
Respiratory Therapy (AS)	52%	45%	58%	52%	52%	47%	59%	58%
Respiratory Therapy (BS)	62%	68%	46%	52%	53%	33%	33%	58%
CollegeAmerica-Flagstaff (M070742)								
	Graduation Rates				Employment Rates			
	2016	2017	2018	2019	2016	2017	2018	2019
Business(AAS) (formerly Business Management & Accounting)	32%	20%	36%	17%	100%	100%	75%	50%
Independence University (M072309)								
	Graduation Rates				Employment Rates			
	2016	2017	2018	2019	2016	2017	2018	2019
Business-DE(AAS) (formerly Business Management & Accounting-DE)	13%	16%	19%	21%	74%	53%	41%	51%
Master of Business Administration-DE (MBA)	60%	59%	70%	62%	50%	53%	44%	52%

In review of CEHE’s subsequent announcement that the schools have ceased enrollment in residential programs as of September 11, 2019, the Commission found that the schools’ action obviates the need for the cease enrollment or cap enrollment directives. CEHE must request from the Commission permission to enroll any new students in any residential program, which will require reconsideration of the performance of that program in terms of student graduation and graduate employment rates.

The Commission reviewed the history of outcomes data reported by CEHE-affiliated schools in the 2016, 2017, and 2018 Annual Reports, in addition to the updated data provided in the response, which was prepared using a report date of July 2019. Overall, the Commission noted that CEHE-affiliated schools are reporting on 113 active programs, 81 of which have been operational long enough to be reportable. Of the 81, 6 are already subject to the cease enrollment directive. The schools reported below benchmark rates of student graduation and/or graduate employment in 32% (24 of 75) of the remaining programs. Although this shows a modest improvement from 30 programs reporting below-benchmark rates during the previous review, the Commission found that additional monitoring is warranted as a means to ensure that CEHE’s strongest attention and managerial resources remain focused on demonstrating successful student achievement throughout the term of the teach-out of

students. The Commission is particularly interested in the progress of the following schools toward demonstrating successful student achievement through acceptable rates of graduation and employment.

- California College of San Diego reported 4 of 8 (50%) of the school’s active/reportable programs below benchmark, three are listed in Table 1.1 above, and the other one is listed in Table 1.2 below.
- College America - Flagstaff reported 1 of 2 (50%) of the school’s active/reportable programs below benchmark, which is listed Table 1.1 above.
- College America – Phoenix reported 3 of 4 (75%) of the school’s active/reportable programs below benchmark, listed in Table 1.2 below.
- Stevens-Henager College – Idaho Falls reported 2 of 4 (50%) of the school’s active/reportable programs below benchmark, listed in Table 1.2 below.
- Stevens-Henager College – West Haven reported 3 of 6 (50%) of the school’s active reportable programs below benchmark, listed in Table 1.2 below
- Independence University reported 7 of 13 (69%) of the school’s active/reportable programs below benchmark, two are listed in Table 1.1, and the others are listed in Table 1.2 below.
- Stevens-Henager College – St. George reported 2 of 3 (67%) of the school’s active/reportable programs below benchmark, listed in Table 1.2 below.

Table 1.2 – Institutions and Programs with Below-Benchmark Rates:

California College of San Diego (M001073)								
Program Title (Credential)	Graduation Rate				Employment Rate			
	2016	2017	2018	2019	2016	2017	2018	2019
Medical Assisting (AOS) (formerly Medical Specialties)	48%	48%	47%	43%	62%	70%	67%	55%
College America-Phoenix (M070743)								
Program Title (Credential)	Graduation Rate				Employment Rate			
	2016	2017	2018	2019	2016	2017	2018	2019
Business (AAS) (formerly Business Management & Accounting)	44%	43%	32%	40%	70%	70%	44%	62%
Computer Technology & Networking (AAS)	44%	44%	49%	43%	77%	77%	50%	20%
Medical Assisting (AOS) (formerly Medical Specialties)	50%	51%	43%	42%	70%	73%	65%	59%
Stevens-Henager College – Idaho Falls (B072351)								
Program Title (Credential)	Graduation Rate			Employment Rate				
	2016	2017	2018	2016	2017	2018		
Accounting (BS)	No starts	0%	50%	No starts	N/A	33%		
Business Administration (BS)	33%	33%	50%	100%	100%	40%		

Stevens-Henager College – West Haven (M070581)								
Program Title (Credential)	Graduation Rate				Employment Rate			
	2016	2017	2018	2019	2016	2017	2018	2019
Accounting (BS)	64%	55%	33%		89%	100%	100%	
Business (AAS) (formerly Business Management & Accounting)	38%	0%	13%		80%	N/A	100%	
Computer Science (BS)	42%	24%	24%	39%	83%	82%	100%	83%
Medical Assisting (AOS) (formerly Medical Specialties)	47%	22%	29%	37%	72%	71%	71%	74%
Stevens-Henager College – Murray (M070583)								
Program Title (Credential)	Graduation Rate				Employment Rate			
	2016	2017	2018	2019	2016	2017	2018	2019
Business (AAS) (formerly Business Management & Accounting)	41%	49%	26%	28%	71%	72%	80%	75%
Healthcare Administration (MS)	77%	86%	76%	78%	80%	33%	0%	33%
Medical Assisting (AOS) (formerly Medical Specialties)	43%	45%	43%	44%	72%	76%	58%	68%
Independence University (B072309)								
Program Title (Credential)	Graduation Rate				Employment Rate			
	2016	2017	2018	2019	2016	2017	2018	2019
Accounting-DE (BS)	N/A	N/A	17%	21%	NA	N/A	73%	72%
Business Administration-DE (BS)	33%	N/A	18%	17%	100%	N/A	53%	33%
Graphic Arts-DE (BS)	N/A	0%	19%	21%	N/A	N/A	63%	53%
Health Services Management-DE (BS)	90%	65%	74%	12%	86%	83%	68%	43%
Information Systems-DE (MS)	50%	53%	37%	58%	70%	75%	30%	64%
Medical Assisting-DE (AOS) (formerly Medical Specialties)	33%	21%	13%	13%	70%	48%	27%	40%
Web Design & Development-DE (BS)	N/A	N/A	13%	57%	N/A	N/A	100%	25%
Stevens-Henager College – St. George (B072360)								
Program Title (Credential)	Graduation Rate				Employment Rate			
	2016	2017	2018	2019	2016	2017	2018	2019
Business (AAS) (formerly Business Management & Accounting)	41%	53%	27%	36%	71%	86%	75%	100%
Medical Assisting (AOS) (formerly Medical Specialties)	39%	51%	47%	45%	75%	52%	65%	50%

If Independence University – the only CEHE-affiliated institution currently offering education exclusively via distance education – is taken as the bellwether of student success rates for distance education programs for the CEHE system, the Commission considered the possibility that there may be further declines in the rates of student success. Of the 13 active programs at Independence University that have been operational long enough to be reportable, 4 programs met ACCSC’s student achievement benchmarks. That means 69% of the school’s programs reported below-benchmark rates of student achievement, and in addition, the school has already discontinued five programs due to poor performance. Given these indicators, it remains the Commission’s primary concern that CEHE vigorously pursue strategies to ensure student success as all programs transition into a distance education delivery format.

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

- a. For programs into which the school has ceased enrollment:
 - i. An **ACCSC Retention Chart**;
 - ii. 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 Contact, Address, & Phone #	Date of Initial Employment	Descriptive Job Title	Other Status (Unemployed, Further Ed., Unknown, Etc.)

- b. For programs into which the school continues to enroll students, submit a Graduation and Employment Chart using a **March 2020 Report Date** and supporting summary information for each Graduation and Employment Chart submitted, 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

- c. For each program for which the reported rates of student graduation and graduate employment do not meet the ACCSC benchmark on the Graduation and Employment Charts required above, 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.

2. CEHE must demonstrate that the schools report student achievement data in accordance with the instructions on the Graduation and Employment (“G&E”) Chart (*Section VII (B)(1), Substantive Standards, Standards of Accreditation*). With the May 2, 2019 Probation Order, the Commission raised questions with regard to the reporting of students that withdraw from one CEHE-affiliated school and re-enroll in a different CEHE-affiliated school. In response, CEHE stated:

CEHE understands and acknowledges the Commission’s requirement that CEHE modify its policies and procedures, with respect to Graduation and Employment Charts, for how to treat, students that leave one CEHE-affiliated school and continue their education and training at another CEHE-affiliated school. CEHE has revised its policies and procedures so that a student who leaves one CEHE-affiliated school and enrolls in another CEHE-affiliated school is reported as a “withdrawal/termination” for the first school and a new start for the CEHE-affiliated school where the student subsequently enrolled.

The response includes a copy of a Procedure Directive dated June 17, 2019, formalizing the new policy. The Commission intends to review documentation for the Graduation and Employment Charts submitted in response to item (1) above as evidence that the new policy has been implemented and how the process is documented.

The Commission also raised the question with regard to the use of the “transfers in and out” categories for students that appeared to have withdrawn and re-enrolled. Specifically, according to data reported in the 2018 Annual Report, some students reported as “transfers” between two programs at the same institution entered the second program more than a year after leaving the first program. With the May 2, 2019 letter, the Commission noted that the movement of students to a cohort one to three years in the future is more typical of students that drop (or are terminated) and subsequently re-enroll in a different program, and raised the question as to whether the CEHE-affiliated schools are accurately reporting these students as “transfers.”

In response, CEHE quotes the definition of a “transfer” published on the Graduation and Employment Chart, and states:

It is clear from the verbiage above that the glossary definition is silent with respect to how a college should treat a student who has a “break” or temporal interruption between withdrawing from one program at a school and transferring into another program at the same school. In the absence of specific guidance, CEHE has historically applied the definition in a way that is most beneficial for the student and the school by discounting any temporal breaks that occur between the time a student withdraws from one program and transfers into another program.

Although CEHE stated that its policy is more beneficial to the student, there is no explanation of how the student benefits when the schools report an extended temporal interruption “transfer” rather than as a “withdrawal and re-enrollment.” The response outlines five “types” of temporal interruptions in enrollment that students may encounter, as follows:

- 1. A student decides they want to transfer into a new program at some point during their current module, but some or all of the courses they are presently taking are not included in the new program into which they want to transfer.*

According to the response, “in almost every case,” students choose to withdraw from the courses they are in and wait until the next module starts to begin classes in the “transfer in” program. CEHE indicated that “[t]he temporal gap we see in this situation can be as short as a few days or as long as a few weeks.” The Commission found that this scenario appears to be typical of students “transferring” from one program to another and would expect the school to be able to document the transfer process (e.g., written request from the student, documentation of credits that will transfer to the new program, enrollment agreement for the new program).

- 2. A student decides they want to transfer into a different degree program. While some of the student’s completed courses may transfer into the new program (i.e. GenEd), the student*

now has to complete the courses that make up the new program. Often times, the courses in the new program are sequential and may have prerequisite requirements. A student wishing to transfer into a new program is often “out of sequence” with the standard delivery cycle for courses in the new program (since they did not originally start in a given program). In these cases, the transferring student may have to wait 1-3 modules before there is a course available in the new program that they are eligible (due to sequencing) to take. The temporal gap we see in these situations can last from 4 weeks to 12 weeks.

This second scenario also appears to be typical of students “transferring” from one program to another and the school would be able to document the transfer process (e.g., written request from the student, notes of advising sessions, documentation of credits that will transfer to the new program, enrollment agreement for the new program).

The Commission noted that CEHE described the remaining scenarios specifically as cases where students “withdraw” and then subsequently “re-enroll” in a different program. In this case, the time of non-attendance is more variable, and the outer parameters (e.g., a few quarters, more than a year) appear more typical of students that drop (or are terminated) and subsequently re-enroll in a different program.

3. *A student withdraws from a program because they need to deal with some “external” issue in their life (financial problems, health problems, transportation problems, family issues, etc.) and after they have resolved the issue the student comes back to college but wants to earn their degree in a different program. The temporal gap we see in these situations can last from a few weeks to a few months.*
4. *A student decides that they need to take a break from college (this happens for a lot of different reason). To take a break, the student must withdraw from their program because CEHE’s schools do not allow approved leave-of-absence. CEHE does not allow approved leave-of-absence because we believe there is simply too great a risk for potential noncompliance with federal Title IV financial aid regulations governing approved leave of absences. Since the college does not allow an approved leave of absence, the student has to withdraw to get the break they want/need. In some cases, when the student decides to come back to college, they have also made a choice to come back into a different program. The temporal gap we see in these situations can last from a few months to a few quarters.*
5. *A student is not being successful in their program and decides to drop out because they do not believe they can succeed in the current program. After being out of school for a period of time, the student finds some new motivation or determination and re-commits themselves to being successful, more dedicated, more committed, and more serious about earning their degree. This may have occurred through continued outreach by the college and interaction with the college’s academic staff, student support staff, or other advisors. After not being successful in the previous program, the student decides that a different program would be a better fit. The student comes back to college and re-enrolls into a new program. The temporal gap we see in these situations can last from a few months to more than a year.*

CEHE concluded that “[d]ue to the differences in situations, reasons, student intent, student choice, and temporal variations, it is virtually impossible to have a “bright-line” or fixed standard to differentiate between categorizing a student a transfer into a new program versus a dropout who then subsequently starts again in a new program.” The response states the following about the method CEHE uses to determine whether a student is a withdrawal or a transfer:

The best solution that CEHE has come up with (and which has been our policy) is to use the ACCSC AIR Cohort Reporting deadline as a hard cutoff for differentiation. In summary, if a student left one program and subsequently transferred (or re-enrolled) into a new program

after the reporting deadline for the original program cohort, CEHE would record that student as a drop for the original program cohort and then record them as a new start in the new program's cohort.

Based on the scenarios described above, the Commission believes that there are certain documented indicators that occur before the break in enrollment that could be used to differentiate between “transfer” and “withdrawal,” such as advising notes, written requests to transfer to another program, evaluation of credits to transfer to the new program, execution of an enrollment agreement for the new program. However, there is also precedent allowing for breaks in enrollment when reporting student outcomes on the Graduation and Employment Chart. Specifically, if a student is able to complete the program within 150% of the reported duration of the program despite any breaks in enrollment, that student may be counted as a graduate. The same logic may be applied to the situation where the student returns to complete a different program. If the student completes the new program within 150% of the normal duration of the program, it would be appropriate to categorize that student is a transfer. In fact, that provides a generous allowance for students that begin a baccalaureate degree program, withdraw, and re-enroll and complete an associate degree program.

CEHE's response also states the following with regard to ACCSC's measurement of student success:

ACCSC stated in its May 2, 2019 letter that the Graduation and Employment Chart is intended to evaluate rates of student achievement at each specific campus. CEHE agrees with this statement. Accordingly, the purpose of the “Transfer to Another Program” and “Transfer From Another Program” categories is to account for and track student achievement and ultimately student success of students who switch from one program to another. It should not matter (nor be punitive to the measurement of a school's success) whether a student moves from one program to another immediately, within a few weeks, within a few months, or even after a year.

The Commission reminds CEHE that ultimate student success is captured when the school reports the re-enrolling student as a start and graduate in the subsequent program. The Graduation and Employment Chart is meant, in part, to measure the success of each **program** in fulfilling the promised educational objectives. When students who withdraw from the program are instead removed from the calculation of the graduation rate by being reported as transfers, the resultant data may serve to mask issues with the baccalaureate degree program that might otherwise be used for a healthy assessment.

Therefore, the Commission directs CEHE to use the following guidance when completing Graduation and Employment Charts in future: **Only if a student withdraws from a program and is able to complete the program into which the student re-enrolled within 150% of the normal duration of the original program, may that student be reported as a transfer.**

The schools will be expected to maintain documentation to support the categorization of students as transfers, including enrollment agreements and transcripts.

Based on the foregoing, the Commission directs CEHE to submit the following with regard to students who withdraw and return to the same school in a different program, provide the following:

- a. A list of all students reported as “transfers out” on the Graduation and Employment Charts submitted with Item #1 above;
- b. For each student, provide transcripts showing that the student completed the subsequent program within 150% of the normal duration of the originating program; and
- c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements.

3. CEHE must demonstrate that the school accurately represents the rights, responsibilities, and obligations of both the student and the school under the enrollment agreement (*Section IV (B)(1)* and *Section IV (C)(2)(c), Substantive Standards, Standards of Accreditation*). The Commission’s original concern stemmed from a provision found in the enrollment agreement used by CEHE schools which stated that if a student discovers any misrepresentation upon which s/he relied on to enroll, they may terminate his/her enrollment without any liability and obtain a full refund of all monies paid. The provision also stipulated that once the 90-day “verification period” had expired, the student forfeited the ability to take any further action with regard to any misrepresentation. CEHE’s December 20, 2018 response states the following regarding this matter:

...CEHE has deleted this language from all of its colleges’ enrollment agreements. CEHE has also notified all currently enrolled students, who may have previously signed enrollment agreements that included this language, that this language is no longer in effect or applicable to any student.

In reviewing updated enrollment agreements also provided in that response, the Commission noted that references to the “verification period” remained in revised enrollment agreements and as such the Commission raised additional questions in the May 2, 2019 Continued System-Wide Probation Order with regard to the accuracy of certain statements and the limitations imposed on rights of students.

At the time of the Commission’s August 2019 review, the statements that CEHE purported to have revised or removed from the schools’ enrollment agreements are as follows:

- 90 day limitation on students’ rights to take action regarding misrepresentation;
- References to non-refundable fees;
- Certification and licensure statements;
- Requirement that students must be paid in full to receive career services;
- Allowance to graduate in any program regardless of the program in which the student originally enrolled;
- Stipulation that student services are offered at the option of the college;
- A section inaccurately titled “Release and Waiver”; and
- Stipulation that refunds are not made in the case the college ceases enrollment.

In response to the May 2, 2019 Continued System-Wide Probation Order, CEHE provided copies of revised enrollment agreements as the following exhibits:

- Exhibit 5.a.1 - Revised Enrollment Agreement for CollegeAmerica Arizona campuses;
- Exhibit 5.a.2 - Revised Enrollment Agreement for CollegeAmerica Colorado campuses;
- Exhibit 5.a.3 - Revised Enrollment Agreement for California College San Diego campuses;
- Exhibit 5.a.4 - Revised Enrollment Agreement for Independence University;
- Exhibit 5.a.5 - Revised Enrollment Agreement for Stevens-Henager College campuses; and
- Exhibit 5.a.6 – Revised Enrollment Agreement for International Students

CEHE also provided a “Highlight/Crosswalk of revisions made to the Enrollment Agreement” for each enrollment agreement as Exhibits 5.a.7 through 5.a.12. These exhibits provide side-by-side comparisons of the previous language and updated language. Additionally, the response includes, as Exhibit 5.a.13, copies of the five current catalogs for College America-Arizona campuses,

CollegeAmerica-Colorado Campuses, California College of San Diego-both campuses, Stevens-Henager Colleges, and Independence University.

The Commission found that the enrollment agreements presented in Exhibits 5.a.1 through 5.a.6 appear to have been revised to address the issues listed above; however, the Commission noted that the response does not indicate when the new forms had been implemented. In the course of reviewing the entirety of the June 28, 2019 response, the Commission considered the following documentation and noted that the schools have not demonstrated use of an enrollment agreement that complies with accrediting standards:

- Exhibit 7.d. Copies of enrollment agreements for the ten most recent applicants to all programs for all schools delivered in a hybrid format or fully distance education format and
- Exhibit 8.c.2. Copies of enrollment agreements for the ten most recent international students who started an academic program at CEHE’s SHC campus in Murray, Utah.

The enrollment agreements included in Exhibit 7.d. appear to have been executed between June 3, 2019 and June 10, 2019. The Commission noted that all were executed on forms that – to varying degrees – differ from the documents submitted in Exhibits 5.a.1-5.a.6. As outlined below, five were executed on what is referred to as “previous” in the table: a version of the enrollment agreement that does not appear to have been updated as CEHE indicated in this response. This “previous” version contains the reference to “verification period” and “non-refundable fees” for international students, includes the outdated “Certifications and Licenses” section, and includes the section title “Release and Waiver.” The other five were executed on what is referred to as “partially updated” in the table: a version that incorporates some changes, however, includes the outdated “Certifications and Licenses” section. The table also identifies individual differences, such as the one enrollment agreement that refers to the non-refundable fee and the three that are missing the section titled “Understanding of Information.”

Student	Campus ³	Accepting School Official Signature Date	Version of Enrollment Agreement
██████	CA-Colorado Springs	June 7, 2019	Partially updated
██████ ██████	Independence University	June 3, 2019	Partially updated– does not include the section “Understanding of Information”
██████	Independence University	June 6, 2019	Partially updated and does not include the section “Understanding of Information”
██████	Independence University	June 6, 2019	Partially updated –does not include the section “Understanding of Information”
██████	SHC-Boise	June 6, 2019	Partially updated
██████	SHC-Boise	June 6, 2019	Partially updated
██████	SHC-Boise	June 10, 2019	Partially updated
██████	SHC-Orem	June 10, 2019	Previous
██████	SHC-St. George	June 4, 2019	Previous
██████	SHC-West Haven	June 10, 2019	Previous – includes references to \$3,500 non-refundable fee

³ Although all campuses except Independence University and SHC-West Haven are no longer enrolling students, the Commission is interested in ensuring that this letter reports the Commission’s full findings regarding schools that are still accredited by ACCSC.

The enrollment agreements included in Exhibit 8.c.2. were all executed between March 14, 2019 and May 10, 2019 for students at SHC-Murray. The Commission noted that all enrollment agreements were executed on forms that do not reflect the changes that CEHE claimed to have made in the December 20, 2018 response. Of particular concern is the appearance of the “verification period” that attempts to limit students’ rights to recourse to a 90-day period following enrollment. The Commission expressly directed CEHE to remove the provision from enrollment agreements with the September 8, 2018 System-Wide Probation Order, and with the December 20, 2018 response, CEHE confirmed to the Commission that the language had been deleted. It appears, based on the signature dates, that CEHE’s response did not appear to be a fully accurate representation of the schools’ practices.

According to CEHE’s December 20, 2018 response, “CEHE completed the revision for of all its colleges’ enrollment agreements on or about October 25, 2018.” A copy of the revised enrollment agreement for all Stevens-Henager College campuses, including SHC-Murray, is included as in that response Exhibit 1.a.1. That enrollment agreement differs significantly from the executed enrollment agreements contained in Exhibit 8.c.2. of the June 28, 2019 response.

Student Last Name	Accepting School Office Signature Date
████	March 14, 2019
██████	March 14, 2019
████████	March 18, 2019
██████████	March 18, 2019
██████████	April 5, 2019
████	April 9, 2019
██████████	April 12, 2019
████	April 12, 2019
████	April 12, 2019 May 10, 2019
████	April 15, 2019

Based on the foregoing, the Commission found that CEHE has not demonstrated the use of an enrollment agreement that complies with accrediting standards in all cases. In context of the multiple versions of an enrollment agreement executed within a three-month time period and the failure to implement promised changes, the Commission found the provision of blank forms to be insufficient to demonstrate the required actions have been taken.

Accordingly, the Commission directs CEHE to submit the following:

- a. An explanation as to why SHC-Murray was using enrollment agreements in March, April, and May 2019 that contained the following provision that CEHE claimed to have deleted from enrollment agreements:

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

- b. If there is an updated enrollment agreement in use at SHC-West Haven and Independence University, submit a signed attestation from the director, affirming the date that the enrollment agreement form was implemented;

- c. A list of the 10 most recent students at SHC-West Haven and Independence University for whom enrollment agreements were executed after the implementation date of the new enrollment agreement form; 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.
4. CEHE must demonstrate that the schools with approved distance education programs and courses have established admissions processes for those programs and courses that include:
- An assessment prior to enrollment of the student's technical skills, competencies;
 - Access to technology necessary to succeed in a distance education environment;
 - An assessment of the student's capability to benefit the distance education program or course; and
 - An assessment as to whether the student's learning style is conducive to online learning;

In addition, CEHE must demonstrate the validity and reliability of the assessment tools used to assess a student's readiness for distance education online learning minimally using engagement surveys, academic progress, and student achievement data (*Section IX (F)(2 & 3), Substantive Standards, Standards of Accreditation*).

In response to the Commission's questions regarding these matters, CEHE engaged in "a complete internal review of the process, tools, and assessments that CEHE's colleges' use to assess, measure, and analyze an applicant's readiness, suitability, and other factors prior to starting any distance education program delivered by CEHE." As a result, CEHE concluded that although the current process adequately measured certain aspects of readiness, the following areas were not adequately addressed:

- *Only measured applicants' general computer and technology familiarity;*
- *Were NOT consistently used to assess and screen applicants before they were allowed to complete the enrollment process and start school at CEHE's ground campuses (CollegeAmerica, Stevens-Henager, and California College San Diego);*
- *Did NOT adequately assess applicants' readiness for success in a distance education program;*
- *Did NOT adequately assess whether an applicant's learning style is conducive to distance education delivery;*
- *Did NOT adequately assess an applicant's ability to benefit from a distance education program;*
- *While there was some data (from student surveys) to support the efficacy of CEHE's assessment processes and tools, the data was minimal, inconsistent throughout CEHE's campuses, and insufficient to effectively validate current practices or identify areas for improvement.*

After consideration of the findings of its internal review, CEHE decided to implement the SmarterMeasure Learning Readiness Indicator from SmarterServices, Inc. The response includes a copy of the contract, a copy of the invoice, and CEHE's payment for this new tool. According to the response, it is CEHE's plan to implement this new assessment process on or about August 1, 2019.

The Commission recognized the work that appears to have gone into the internal study as well as CEHE's choice to adopt a new assessment approach. The Commission is interested in monitoring this adoption and how these changes take root and grow. As such, the Commission will monitor the

implementation of the SmarterMeasure Learning Readiness Indicator in the initial stages, and then monitor the efficacy of the new approach with studies of academic progress, retention data, and finally student graduation rates for the first cohorts of students admitted under the new process and procedures.

Accordingly, the Commission directs the school to submit, at this time, the following:

- a. The admissions requirements for enrollment into each distance education program or course of study;
 - b. A list of the first 50 students that applied to any CEHE-affiliated school into a program delivered in a hybrid format or fully distance education format since the implementation of the SmarterMeasure Learning Readiness Indicator;
 - c. Of those 50 students, a list of all students accepted for admission and corresponding copies of admissions documentation, distance education readiness assessments, and enrollment agreements for teach; and
 - d. Of those 50 students, a list of all students that were denied admission and highlight those that were denied based on failing to meet CEHE’s DE readiness assessment.
5. CEHE must demonstrate that the schools have and enforce an acceptable policy of student attendance that promotes sufficient levels of student attendance such that the required knowledge, skills, and competencies can be reasonably achieved (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*). The question was first raised in the October 17, 2018 TSR issued to SHC-St. George, as the on-site evaluation team noted that the attendance policy published in the school’s catalog did not provide sufficient detail regarding attendance requirements for the on-ground components of the courses. The policy did not define what levels of absence are considered excessive, or what actions will be taken in response to student absences, except for the specific case of automatic dismissal if a student is absent for 14 consecutive days.

In response, although SHC-St. George stated that “the attendance policy has been revised to include levels of attendance and detail regarding attendance requirements and actions taken for the blended delivery courses,” the Commission found that the new policy still does not provide sufficient detail regarding required attendance levels.

In response to the May 2, 2019 Probation Order, CEHE included a revised Procedure Directive outlining the revised attendance policy, which appears to apply to all CEHE-affiliated schools. The Commission found the following:

- The attendance policy with regard to onground students is stated as follows: “[o]nground (“OnG”) students attending classes on campus are expected to be on time and maintain a high attendance rate.” The policy does not define what is meant by “high attendance rate.” The policy for online students is stated as follows: “[s]tudents taking a fully online course are expected to participate, at a minimum, of four (4) days each week in their course.” It is not clear that the consequences, outlined below, are tied to the expectation of four days each week, rather it seems to be tied to overall attendance percentages.
- The consequences for failing to meet the attendance expectations are outlined as follows:
 - The policy pertaining to “onground” students states, “[i]f a new student does not regularly attend classes during the first five days of their first module, then the student will be reclassified as a No-Show and will be withdrawn from the program.” The policy does not define “regular” attendance during the first five days of the module, so it is unclear how the policy can be effectively applied. Given that the schools will no longer be admitting new residential students, the provision does not apply; however, the Commission noted that there is no corresponding

- provision for online student attendance in the first week. The Commission is interested in understanding if there is a parallel policy regarding “no shows” for online or hybrid students.
- The policy pertaining to “onground” students indicates that those “who are absent more than 25% of any module will be sent a 25% Absent Notice from the Registrar stating that the student’s absences are excessive and that the student is in jeopardy of failing the course.” For online students, “[i]f an online student fails to attend/participate in his/her online course for five (5) consecutive days, then the student will be contacted by Student Services about their poor attendance/participation and will be reminded/encouraged to actively attend/participate in his/her course.”
 - The policy pertaining to “onground” students indicates that “students who are absent more than 50% of any module will be placed on Attendance Warning Status” and “directed to meet with the Dean or Program Advisor in order to discuss issues and identify strategies for improving attendance.” For online students, “[i]f an IU student has no attendance/participation for ten (10) days, then he/she will receive an Attendance Warning Letter.”
 - The only defined consequence for failing to comply with the school’s policies occur after 14 consecutive absences: “[i]f a student fails to return to class on or before the expiration of fourteen (14) days, then the student’s enrollment must be terminated.
- With regard to students engaged in what CEHE terms “Blended delivery,” a hybrid of residential and online education, there is no definition of acceptable attendance. The policy is stated as follows:
Students completing coursework in a Blended model are strongly encouraged to participate in all live class sessions, whether online or onground. Scheduled onground courses may include in-class activities that may not be made up if a student is not present.

As justification for using the policies outlined above, CEHE conducted an analysis of attendance percentages, GPAs, grades, and student status (drop or graduate) for a three-year period was conducted for both on-ground and online courses. According to the response,

Results suggest that there is a significant difference in the number of “D” grades between the group with 51%-75% attendance and the group with 76%-89% attendance. This data supports the colleges’ revised policy to take action when a student is absent more than 25% of a course. There was also a significant difference in the course pass rate between the group with 26%-50% attendance and the group with 51%-75% group. This data supports the colleges’ revised policy to place students on attendance warning if they reach 50% for a module. The attendance percentage of graduates versus dropped students suggest that students who fall below 50% attendance in courses are more likely to drop out of school. Overall program attendance percentages suggest that students need to maintain at least 50% attendance in each course to achieve the required 2.0 GPA to graduate.

The Commission agrees that the analysis shows a relationship between lower rates of attendance and lower rates of program graduation; however, CEHE has not shown that the 50% attendance rate benchmark is sufficient to achieve the educational objectives of the program. In addition, the Commission noted that the 50% threshold is not an established lower limit, rather it is a trigger for the beginning of the attendance warning period. The Commission is unconvinced of the efficacy of the current policy and in light of the transition to distance education found that much more detail is required with regard to the attendance policies for online and hybrid students. In addition, given that the policies described above appear to be effective for all CEHE-affiliated schools, the Commission is interested in a demonstration of compliance for all schools.

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

- a. A detailed explanation of the attendance policies and procedures for onground students during the teach-out phase, hybrid students during the teach-out phase, and online students. The policies and procedures must clearly define what levels of absence are considered excessive, the actions that the school will take at each level including advisement, warning, probation if applicable, and termination;
 - b. The school’s justification for defining the acceptable level of student attendance, specifically demonstrating that the required knowledge, skills, and competencies can be reasonably achieved at that level;
 - c. An explanation as to how the progressive steps in the policy (e.g., advisement, warning) are designed to promote sufficient levels of attendance; and
 - d. A copy of the schools’ current catalogs, demonstrating disclosure of the attendance policies as stated above.
6. CEHE must demonstrate that the schools advertise in a truthful and accurate manner and that the schools take care to avoid creating any false, misleading, misrepresenting, or exaggerated impressions on prospective students (*Section IV (B), Substantive Standards, Standards of Accreditation*). CEHE’s response to the May 2, 2019 Probation letter includes all advertising and promotional materials used by CEHE-affiliated schools; a description of the actions taken to ensure that each advertisement connected with the finding of the letter complies with accrediting standards; a sample “personal website” created for prospective students; documentation designed to support the claim that the schools award “millions of dollars” annually in grants, scholarships, and other financial aid; graduate testimonials used in advertising.

Given the history of the Commission’s issues and actions regarding CEHE’s advertising, the Commission determined that additional monitoring is warranted to ensure that CEHE has established mechanisms which provide assurance that future advertising will comply with accrediting standards. The Commission noted, in CEHE’s response to the September 8, 2018 System-Wide Probation Order that “[o]n a cycle of every three years, CEHE engages one of its outside legal advisors to hire an independent third party firm to conduct a system-wide secret shopping review of CEHE’s recruitment process and engagement with prospective students.” Although the response includes documentation that the third party was engaged in 2016, the response does not include the results of that review. Therefore, with the May 2, 2019 System-Wide Probation Order, the Commission directed CEHE to submit the results of the 2019 independent system-wide review of CEHE’s recruitment process and engagement with prospective students. According to the response, although CEHE previously indicated the next secret shopping event will be conducted during the spring or summer of 2019,

Several months ago, CEHE made the decision to conduct the 2019 secret shopping during the third quarter of 2019. Therefore, as of the date of this response, the 2019 review has not been completed. That being said, CEHE’s legal advisor, [REDACTED] has finalized the 2019 agreement with [REDACTED] for the 2019 review and that activity is scheduled for the third quarter of 2019. Attached as Exhibit 6.e is a copy of the executed agreement with [REDACTED] and copies of the payment CEHE has already made for this project. CEHE will provide the Commission with the results of the 2019 secret shopping review upon completion of the project.

In addition, the Commission is interested in viewing advertising in light of the September 11, 2019 announcement that the schools will no longer enroll students in residential programs. Accordingly, the Commission directs CEHE to submit the following:

- a. The results of the 2019 independent system-wide review of CEHE’s recruitment process and engagement with prospective students;
 - b. CEHE’s assessment of the results of the system-wide review, including:
 - i. An assessment as to whether the results indicate that there is adequate management in place to provide assurance that advertising and representations will comply with accrediting standards and
 - ii. A description of any improvements that CEHE intends to make in response to the results of the system-wide review;
 - c. A description of any other mechanisms that CEHE intends to employ to ensure advertising and representations are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions; and
 - d. Copies of all advertising and promotional materials in current use by each CEHE-affiliated school, including - but not limited to - Internet advertising, the URL for the school’s websites, radio or television (scripts are acceptable), flyers, direct mail, surveys, newsprint, and Yellow Pages.
7. CEHE must demonstrate that the schools have and enforce consistent policies and procedures with regard to independent study at all affiliated institutions (*Section I (A)(I)(d), Substantive Standards, Standards of Accreditation*). Questions regarding the independent study policy were first raised in the October 17, 2018 TSR issued to CCSD-San Marcos. The on-site evaluation team noted that the school’s “directed study” policy was described in different ways during the on-site evaluation. In response to the TSR, the Commission found that the school’s policy statements were inconsistent regarding the circumstances under which independent study is allowable. Therefore, with the May 2, 2019 Continued Probation Order, the Commission directed CCSD-San Marcos to demonstrate the consistent publication of an independent study policy, as well as documentation that the school is following that policy.

In response, CEHE provided an updated Procedure Directive dated June 18, 2019. According to that policy, a “[d]irected Study contract is signed by the student and by an instructor qualified to teach the subject matter no later than the end of the first day of class.” The response includes a single completed Directed Study Contract, which shows that the student and the instructor signed the contract 21 days after the first day of class. The Commission will therefore provide CEHE with an additional opportunity to provide documentation showing that “Directed Study” is delivered in accordance with the stated policy. In addition, the Commission is interested in a sample of documentation from all affiliated schools to ensure that the other schools in the system are implementing the June 18, 2019 directive.

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

- a. For reference, a copy of the June 18, 2019 Procedure Directive regarding Directed Study along with any revisions to the policy in light of the school teach-out plans, if applicable;
- b. A list of the ten students most recently engaged in directed study at CCSD-San Marcos, and copies of the signed Directed Study Contracts; and
- c. A list of the ten students most recently engaged in directed study at the other CEHE-affiliated schools and copies of the signed Directed Student Contracts.

8. CCSD-San Diego must demonstrate that instructional materials and equipment are sufficiently comprehensive and reflect current occupational knowledge and practice (*Section II (A)(5)(a), Substantive Standards, Standards of Accreditation*). The question regarding sufficiency of equipment provided by CCSD-San Diego for the Computer Technology and Networking; Computer Programming; and Computer Science programs was first raised in the February 16, 2018 TSR. Despite the school's assertions that equipment for these programs was sufficiently up-to-date, the Commission found that the school had not supported those claims with documentation. With the September 6, 2018 Probation Order, the Commission directed the school to provide a description of the review and commentary by the Program Advisory Committee, as well as CCSD's own assessment of equipment and plan for ongoing improvement. With the May 2, 2019 Continued Probation Order, the Commission asked for assessment and plans specific to the two associate degrees in question, evidence of the school's progression toward becoming a Cisco Network Academy and how this step is improving the Computer Science program through a review by the PAC.

In response, CEHE indicated that the school solicited feedback during a faculty meeting conducted in April 2019:

Technology faculty members recommended adding large monitors to create a "Programming Computer Lab" at both the San Diego and National City campuses. Faculty member [REDACTED] explained that when he is consulting with his clients, he has a minimum of two monitors to assist in the coding. [REDACTED], coordinated with the company AutoAnything to have additional monitors donated. Within the week, 30+ monitors were installed. The new set up allows students to connect their laptops and see the code they are writing in large font.

In addition, the school conducted meetings of the Program Advisory Committees responsible for oversight of the programs and received the following recommendations:

- Provide MAC Pro for student use;
- Add Digital equipment in classrooms;
- Explore alternative Integrated Developer Environments;
- Increase Computer Students' Computers RAM to 16 GB and convert to Solid State Drive HD 256 GB;
- Access resources on cloud like AWS or Azure; and
- Visual Studio/Explore alternative Integrated Developer Environments.

All suggestions were assigned to [REDACTED] to be completed by August 1, 2019, which was beyond the timeframe of the response. The Commission was interested in further monitoring of the improvement to the equipment in the program; however, the September 11, 2019 announcement that CEHE-affiliated schools intend to "teach out" students remaining in residential programs changes (and broadens) the nature of the questions the Commission has with regard to the schools' equipment. At this juncture, the Commission determined that it appears germane to review plans for each school, for each program, for ensuring that residential training programs are adequately equipped throughout the term of the teach-out.

Accordingly, the Commission directs CEHE to submit the following for each affiliated school that will continue to offer residential education for the duration of a teach-out:

- a. A description of the schools' most recent assessment of equipment and instructional materials for each program;

- b. A description of the school’s plan to ensure that the equipment is sufficiently comprehensive and reflect current occupational knowledge and practice; and
 - c. A copy of the Program Advisory Committees’ review and comment with regard to the schools’ plans to maintain sufficient equipment throughout the term of the teach-out and documentation of the school’s efforts to implement any suggestions by the Program Advisory Committee.
9. CEHE must demonstrate that the schools are in compliance with all applicable federal, state, and local government requirements (*Section I (B)(1)(e)(iii), Rules of Process and Procedure, Standards of Accreditation*). As stated in the May 2, 2019 Commission letter, CEHE’s January 23, 2019 letter indicates that with regard to the False Claims Act complaint filed against CEHE by the U.S. Department of Justice (“DOJ”), the district court judge issued a new opinion and that the scope of the claims against CEHE had been “dramatically reduced and narrowed in scope... [a]dditionally, the ability of the Relators to pursue claims beyond the limited claims that the Government intervened upon has been denied.” The letter listed the following details:

On January 14, 2019, the court ordered the following:

- 1. CEHE’s Motion for Leave to Take Judicial Notice was granted.*
- 2. CEHE’s Motion to Dismiss the Government’s Amended Complaint in Intervention was granted in part and denied in part. The court dismissed with prejudice the Government’s claims under the False Claims Act to the extent they are based upon its G5 certification theory of liability. The court denied the remainder of the motion to dismiss.*
- 3. CEHE’s Motion to Dismiss Relators’ Fourth Amended Complaint was granted in part and denied in part. The court dismissed with prejudice the Relators’ second cause of action based upon G5 certifications and the third cause of action based upon required management assertions in CEHE’s annual audits. The court also dismissed portions of the Relators’ first cause of action based upon the Colleges’ Program Participation Agreements (“PPAs”) with the Department of Education.*
- 4. Perhaps most importantly, the court found that the Government’s Complaint in Intervention superseded the Relators’ amended complaint and that any pleadings subsequently filed by the Relators lacked legal effect. Therefore, the court ordered that Relators’ Second Amended Complaint, Third Amended Complaint, and Fourth Amended Complaint be stricken.*

In response to the May 2, 2019 Commission letter, CEHE provided an update regarding the complaint filed by the DOJ. Specifically, CEHE state that “the Government chose **not** to file a motion to amend its complaint any further after the court’s January 14th ruling.” The court also requested that CEHE and the DOJ’s lawyers participate in another mediation, which occurred on May 22, 2019. CEHE indicated that “[t]here was no resolution of the matter following the mediation” [and that] the court extended the discovery period until November 2019.”

In regard to the complaint filed by the Colorado Attorney General (“COAG”), CEHE indicated that the judge has not issued a verdict or decision and stated that there is “no indication of when the judge will issue his decision.” However, CEHE provides this update:

First, a recent ruling by the Colorado Court of Appeals clarified that the COAG must prove there was a “significant public impact” when bringing a Colorado Consumer Protection Act (“CCPA”) complaint. On April 19, the COAG filed a motion with the court requesting that the COAG and CEHE be allowed to file revised/supplemental Proposed Findings of Fact and Conclusions of Law in this matter. At the same time, CEHE filed a motion requesting the court “reconsider” its previous rulings (back in 2017) whereby it denied CEHE’s motions for

*summary judgment based upon the court's decision, at that time, that the COAG **did not** have to prove significant public impact. The court granted the COAG's motion and ordered that both sides submit revised Findings of Fact and Conclusions of Law. The court has not yet ruled on CEHE's motion for reconsideration.*

In addition, upon learning that COAG violated the Protective Order in this case, "CEHE filed a motion with the court for sanctions." On May 15, 2019, the court issued four sanctions against COAG. COAG complied with three sanctions and filed a motion for consideration of the fourth sanction to pay CEHE's legal expenses related to this matter. The schools state that oral arguments on this motion were scheduled for July 2, 2019.

On May 20, 2019, CEHE notified ACCSC that CEHE had received a Civil Investigative Demand ("CID") from the Consumer Finance Protection Bureau ("CFPB"), a U.S. government agency that provides consumer protection in the financial sector. By letter dated July 11, 2019, ACCSC requested additional information on this matter. According to CEHE's response,

CEHE has no knowledge as to the impetus for the CFPB's investigation. According to the April 12, 2019 notice that CEHE received from the CFPB, the Civil Investigative Demand ("CID") was issued pursuant to Section 1052 of the Consumer Financial Protection Act of 2010 and 12 C.F.R Part 1080 to determine whether there is or has been a violation of any laws enforced by the Bureau of Consumer Financial Protection. The CID contained a "Notification of Purpose" pursuant to 12 C.F.R. §1080.5. That notice stated the following:

The purpose of this investigation is to determine: (1) whether colleges or associated persons are offering to extend credit, extending credit, or providing financial-advisory services to students; (2) whether these persons, in connection with offering to extend credit, extending credit, or providing financial-advisory services, have misrepresented the true nature of a financing program or enrolled students in a financing program without their knowledge or consent in a manner that is deceptive, unfair, or abusive, in violation of §§ 1031 and 1036 of the Consumer Financial Protection Act of 2010, 12 U.S.C. §§ 5531, 5536; and (3) whether Bureau action to obtain legal or equitable relief would be in the public interest.

With regard to the status of the action, CEHE's response states:

...on or about June 15, 2019, CEHE submitted a Respondent's Supplement to Petition to Set Aside or Modify Civil Investigative Demand. A copy of the submission is attached as Exhibit b.2. Since the date of that filing, CEHE has not received a decision on its Petition, and neither CEHE nor its counsel have received any further correspondence from CFPB. In accordance with CFPB's Rules Relating to Investigations, CEHE's timely filed Petition stays the time permitted for compliance with the CID until the Petition is adjudicated. (See 12 C.F.R. § 1080.6(f).)

With three actions remaining open, the Commission determined that further monitoring is warranted. Accordingly, the Commission directs CEHE to submit the following:

- a. An update and final determination, if available, regarding the complaint filed by the U.S. Department of Justice;
- b. An update and final determination, if available, regarding the complaint filed by the COAG;
- c. An update and final determination, if available, regarding the CID filed by CFPB; and
- d. Any other information or documentation regarding any pending or final litigation matters with respect to any CEHE-affiliated school.

PROBATION REQUIREMENTS:

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

The Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is on Probation. However, a school that is subject to Probation may seek the Commission's approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation*.

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

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

MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

Based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and the schools' longest program of more than two years, the maximum timeframe allowed for the CEHE-affiliated schools, to achieve and demonstrate compliance with the *Standards of Accreditation* is two years. The timeframe to achieve compliance began as of September 6, 2018 and ends on **September 7, 2020**. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

NOTIFICATION TO STUDENTS:

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

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 each 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 each school must supply the Commission with complete documentation of compliance with accrediting standards.

CEHE must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with

accrediting standards.⁴ If the response contains documentation that includes personal or confidential student or staff information that is not required for the Commission’s review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

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

Keep in mind, the 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 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 30, 2019**. If a response, the required fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before December 30, 2019**, the Commission will consider further appropriate action.

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

For assistance or additional information, feel free to contact me at [REDACTED]

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

Encl.: Appendix I – Accreditation Actions Considered

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

⁵ ACCSC assesses a \$1,000 processing fee to a school placed on Probation.

APPENDIX I
ACCREDITATION ACTIONS CONSIDERED

School	Accreditation Actions Considered	Materials Considered
California College San Diego (#M001073) San Diego, California	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation /Change of Location • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school's response • September 6, 2018 System-wide Probation Order and the school's response • November 20, 2018 ACCSC letter and the school's response
College America (#M070742) Flagstaff, Arizona	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school's response • September 6, 2018 System-wide Probation Order and the school's response • November 20, 2018 ACCSC letter and the school's response
CollegeAmerica (#B070743) Phoenix, Arizona	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school's response • September 6, 2018 System-wide Probation Order and the school's response • November 20, 2018 ACCSC letter and the school's response
Independence University (#B072309) Salt Lake City, Utah	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school's response • September 6, 2018 System-wide Probation Order and the school's response • November 20, 2018 ACCSC letter and the school's response
Stevens-Henager College (#B070581) West Haven, Utah	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation/ Degree Program • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school's response • September 6, 2018 System-wide Probation Order and the school's response • November 20, 2018 ACCSC letter and the school's response

School	Accreditation Actions Considered	Materials Considered
Stevens-Henager College (#B070582) Orem, Utah	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response
Stevens-Henager College (#B070583) Murray, Utah	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation/ Degree Program • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • November 20, 2018 ACCSC letter and the school’s response
Stevens-Henager College (#B070584) Logan, Utah	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response
Stevens-Henager College (#B072351) Idaho Falls, Idaho	<ul style="list-style-type: none"> • Probation/Renewal of Accreditation 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response
Stevens-Henager College (School #B070764) Boise, Idaho	<ul style="list-style-type: none"> • Probation/ Renewal of Accreditation • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • November 20, 2018 ACCSC letter and the school’s response
Stevens-Henager College (School #B072360) St. George, Utah	<ul style="list-style-type: none"> • Probation • Renewal of Accreditation • 2018 Annual Report Rates 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • October 17, 2018 Team Summary Report and the school’s response • November 20, 2018 ACCSC letter and the school’s response

School	Accreditation Actions Considered	Materials Considered
California College San Diego (School #B072374) San Marcos, California	<ul style="list-style-type: none"> • Probation • Renewal of Accreditation 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • October 17, 2018 Team Summary Report and the school’s response
CollegeAmerica (#B070544) Fort Collins, Colorado	<ul style="list-style-type: none"> • Probation • Renewal of Accreditation and Initial Distance Education • Warning 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • October 17, 2018 Team Summary Report and the school’s response • March 26, 2018 Continued Warning Order and the school’s response
CollegeAmerica (#M001507) Denver, Colorado	<ul style="list-style-type: none"> • Probation • Renewal of Accreditation and Initial Distance Education 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • October 17, 2018 Team Summary Report and the school’s response
CollegeAmerica (#B070623) Colorado Springs, Colorado	<ul style="list-style-type: none"> • Probation • Warning/Renewal of Accreditation 	<ul style="list-style-type: none"> • May 2, 2019 System-wide Probation Order and the school’s response • September 6, 2018 System-wide Probation Order and the school’s response • March 26, 2018 Continued Warning Order and the school’s response