

December 5, 2019

ELECTRONIC DELIVERY

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Takoda Institute of Higher Education
 1845 East Franklin Avenue
 Minneapolis, Minnesota 55404

School #M072435

Dear ██████████

At the November 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the response to the Commission’s June 26, 2019 Warning notification and the Outcomes Report and Program Advisory Committee Report submitted by Takoda Institute of Higher Education (“TIHE”) located in Minneapolis, Minnesota. Upon review of the June 26, 2019 Commission letter and the school’s response to that letter, the Commission voted to place TIHE on **Probation** with a subsequent review scheduled for ACCSC’s **May 2019** meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

Student Achievement Outcomes

TIHE must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education (*Section VII (B)(1)(b), Appendix VI, Substantive Standards, Standards of Accreditation*). TIHE must also be able to support these rates through the school’s verifiable records of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). Specifically, the Commission considered the history of TIHE’s reported student graduation and employment rates from May 2014 to present as shown in the chart below:

Program	Length in Month	G/E	May 2014 Report Date	July 2016 Report Date	Feb. 2017 Report Date	March 2018 Report Date	Feb. 2019 Report Date	July 2019 Report Date	ACCSC Benchmark Rates
Administrative Professional	9/6*	G	41%	40%	57%	0%	17%	0%	55%/60% 73%
		E	86%	25%	75%	No rate	0%	0%	66%/70%
Computer Support Specialist	9	G	██████████	52%	47%	57%	40%	38%	60%
		E	██████████	70%	75%	29%	67%	55%	70%
Patient Services Specialist+	6	G	72%	71%	65%	92%	30%	45%	69%/73%
		E	62%	57%	55%	55%	33%	50%	66%/70%

*Originally, this was the 9-month Administrative Assistant program. The school reduced the program to 6 months in length effective with the March 2018 Report Date.

+Formerly the Health Information & Patient Services Specialist program

As shown in the chart above, the graduation and employment rates for the Administrative Professional,¹ Computer Support Specialist, and Patient Services Specialist Certificate programs all continue to fall below the Commissions benchmarks. In assessing the history of the school’s student achievement rates, it is concerning that both the Administrative Professional and Patient Services Specialist programs have been unable to consistently meet ACCSC’s student achievement benchmarks since the school’s initial accreditation in June 2014, and the Computer Support Specialist program has continually struggled with the graduation rate benchmark since the program began. In addition, the student achievement rates in the Administrative Professional and Computer Support Specialist programs worsened between the two most recent report dates of February 2019 and July 2019.

In response to the June 26, 2019 Warning letter, TIHE provided graduation and employment rates with a July 2019 report date as highlighted in the chart below along with additional information regarding TIHE’s efforts to address the school’s student achievement problem. The Commission cannot overlook that as of the July 2019 Report Date on the Graduation and Employment Chart, none of the school’s programs are currently meeting the student achievement benchmarks, and that even the rate closest to its benchmark, the Computer Support Specialist (Certificate) program employment rate, is still 15 percentage points below the Commission’s benchmark rate.

Program	Length in Months	G/E	July 2019 Report Date	ACCSC Benchmark Rates
Administrative Professional	9/6	G	0%	55%/60%73%
		E	0%	66%/70%
Computer Support Specialist	9	G	38%	60%
		E	55%	70%
Patient Services Specialist	6	G	45%	69%/73%
		E	50%	66%/70%

TIHE’s response indicates that there are a variety of factors impacting the school’s ability to demonstrate successful student achievement rates. As part of the school’s analysis, TIHE stated that the school markets its programs to the Native American community near the school, and that this community faces unique challenges that hinder student success in the school’s programs. These challenges include financial hardships, underemployment, lack of daycare, and lack of transportation. In an effort to address these challenges, TIHE has sought assistance from the school’s Program Advisory Committees and has received recommendations regarding the expansion of the Student Services Department to provide additional support for students, strengthening admissions procedures to ensure prospective students understand program requirements, and changing the structure of pre-requisites. The school indicated that many of the potential changes are still under review or have been implemented very recently. In addition, TIHE provided occupational outlook information for the Patient Service Specialist (Certificate) and Computer Support Specialist (Certificate) programs in an effort to show program viability.

¹ TIHE noted that the school has not enrolled students in the Administrative Professional program since January 2018 and stopped marketing the program in June 2018.

The Commission considered TIHE's explanations and strategies for supporting and enhancing student graduation and employment for the school's programs. Upon review of the information provided by the school, the Commission found that despite its formal monitoring of the reported rates of student achievement and concordant institutional actions, and despite the school's formal reporting on its continual efforts to enhance and support student achievement, TIHE has been unable to demonstrate a level of improvement that would bring the school's graduation and employment rates to a minimally acceptable level as required by accrediting standards.

While the Commission acknowledged the initiatives being considered and implemented by TIHE, the Commission is concerned that the history of TIHE's student achievement rates shows a trend of below-benchmark graduation rates with no evidence of improvement. TIHE must seriously consider whether the school can offer its programs in a manner that will translate to successful student achievement for the student population served by the school. Moreover, if the school cannot demonstrate successful student achievement including graduation and employment rates that meet or exceed the Commission's established benchmarks, then the Commission will take appropriate action as afforded under *Section VII, Rules of Process and Procedure, Standards of Accreditation* to include withdrawing the school's accreditation.

Program Advisory Committees

In response to the Commission's Warning letter, TIHE provided PAC minutes for one meeting for each of the Computer Support Specialist, Digital Office Professional,² and Patient Services Specialist programs held in August 2019. In addition, TIHE stated that the school scheduled a second meeting for each program in December 2019. In light of the seriousness of the Commission's concerns with the viability of TIHE's programs, it is critical that the school demonstrate its continued commitment to using the Program Advisory Committee's input and expertise to assess and make recommendations on the school's programs, to include the Administrative Professional program. Accordingly, TIHE must submit a report on its continued efforts to demonstrate that the school conducts at least two Program Advisory Committee ("PAC") meetings annually, one of which is held at the school. TIHE must ensure that the PAC reviews, at least annually, the established curriculum of the program and comments as to the appropriateness and adequacy of the program objectives, program length, and curriculum content. The PAC must also review and comment, at least annually, on student graduation, graduate employment, and, where required, state licensing examination outcomes of each program (*Section II (A)(6)(c) and (d), Substantive Standards, Standards of Accreditation*).

In order to afford TIHE with an opportunity to further develop its student achievement support strategies in the Administrative Professional, Computer Support Specialist, and Patient Services Specialist programs and to document the effectiveness of these strategies on the reported rates of student achievement, the Commission determined that further monitoring is warranted.

In light of the reported rates of student achievement and given the important role the Program Advisory Committee's play to ensure the quality of a school's program offerings, the Commission directs the school to submit the following:

- a. An updated description of the factors impacting successful student achievement in each of the school's programs, an updated description of the strategies implemented to overcome those factors, and an analysis and assessment of the effectiveness of the school's efforts;

² TIHE stated that the school is "not currently enrolling" for the Digital Office Professional program.

- b. **Detailed** program viability studies for the Administrative Professional, Digital Office Specialist, Computer Support Specialist, and Patient Services Specialist programs to include the school’s detailed analysis as to the viability of each program and evidence to support program viability;
- c. Written and detailed minutes of all PAC meetings held for all programs in 2019 that include:
 - i. A description of all members in attendance (i.e., titles and affiliations);
 - ii. The date, time, and location of the meeting; and
 - iii. A comprehensive and clear description of the review and commentary made by the school representatives and the Program Advisory Committee members in compliance with Section II (A)(6)(e), Substantive Standards, Standards of Accreditation. The school is reminded that PAC review and comment activities must include all items outlined in *Section II (A)(6)(d), Substantive Standards, Standards of Accreditation*;
- d. Graduation and Employment Charts for the Administrative Professional (Certificate), Computer Support Specialist (Certificate), and Patient Services Specialist (Certificate) programs using a **January 2020 Report Date**;
- e. Summary information for **each** Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
 - i. For each student start, provide the following information:

Student Name	Program	Start Date	Graduation Date	Withdrawal/ Termination Date

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

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

- iii. For each graduate classified as employed in the field³ (line #14), provide the following information:

Graduate Name	Program	Start Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ⁴ (i.e., graduate or employer)

- iv. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Graduate Name	Program	Start Date	Description of the Documentation on File

- v. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

Graduate Name	Program	Start Date	Description of the Documentation on File

³ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

⁴ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

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

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

- f. An ACCSC Retention Chart for each of the school’s programs (available from the Commission’s website); and
- g. Any additional information, **to include contemporaneous retention, graduation, or employment data**, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.

In responding to this letter of Probation, TIHE must demonstrate to the Commission a likelihood of student achievement that will lead to acceptable graduation rates. Additionally, TIHE must demonstrate as part of its response that the school has identified the root causes (internal and external) surrounding the inability to demonstrate successful student achievement as measured via graduation rates and provide evidence of successful student achievement. The Commission to this point is unpersuaded that the issues cited by the school as challenges are acceptable mitigating factors because the school has not demonstrated a cohesive and effective plan of action to help students overcome those challenges. Pursuant to *Section VII (R), Rules of Process and Procedures, Standards of Accreditation*, if the school fails to demonstrate successful student achievement, the Commission is likely to take a programmatic action to require a school to cease enrollment in a program, or to suspend or revoke the approval of a program if that program fails to demonstrate acceptable rates of student achievement. The Commission may also take further institutional action to include continuing the school on probation or a withdrawal of accreditation action.

Administrative Professional and Digital Office Professional Program

TIHE noted in its response that the school has not enrolled students in the Administrative Professional program since January 2018 and stopped marketing the program in June 2018, and that it has ceased enrollment into the Digital Office Professional program. The Commission reminds TIHE that when a program has not had any enrollments or graduates for one year, the Commission may request additional supporting information from the school to determine whether the school has maintained the capacity to offer the program, and based upon its review of the information, the Commission may cease to approve the program if the school has not demonstrated the capacity to offer the program (*Section IV (e)(6)(f)(i), Rules of Process and Procedure, Standards of Accreditation*). Therefore, it is important that TIHE provide a detailed response regarding the status of the Administrative Professional and Digital Office Professional program as required by this letter. Alternatively, TIHE should upload a [Programmatic Teach Out Plan Approval Form](#) to ACCSC College 360 database which can be accessed by [clicking here](#).

TEACH-OUT PLAN REQUIREMENT

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

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 that accrediting requirements have been met by the due date as set forth herein may result in a revocation of accreditation action.**

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

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

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

MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

As stated in *Section VII (M), Rules of Process and Procedures, Standards of Accreditation*, where the Commission has found an area in which a school is out of compliance with accreditation standards or requirements, the period allotted to the school to remedy the noncompliance or cure the deficiency, together with the time for the Commission's final decision, will not exceed eighteen months if the school's longest program is at least one year, but less than two years in length;. Accordingly, the maximum eighteen month timeframe for TIHE to achieve compliance begins as of the date of this letter. 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 if the school's response demonstrates an increasingly deteriorating financial position and lack of financial soundness.

RESPONSE REQUIREMENTS:

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

TIHE 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.⁵ If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

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

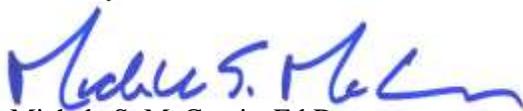
Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the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

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before March 18, 2020**. If a response, the required fee,⁶ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before March 18, 2020**, the Commission will consider further appropriate action.

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

For further assistance or additional information, please contact [REDACTED] or [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

⁵ 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.

⁶ ACCSC assesses a \$1,000 processing fee to schools placed on Probation.