

April 12, 2019

**ELECTRONIC DELIVERY**

██████████  
 Campus President  
 Fortis College  
 555 E. Alex Bell Rd.  
 Centerville, Ohio 45459-2712

*School #M000648*  
*Continue Warning*

Dear ██████████

At the February 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Commission’s previous action to place Fortis College (“Fortis-Centerville”) located in Centerville Florida on Warning and considered the following applications and reports:

- Application for Renewal of Accreditation;
- Application for a Distance Education Facility for the facilities in Greenwood Village, Colorado and Winter Park, Florida;
- Application for an Academic Associate Degree for the Medical Billing and Coding (AAS) program, and
- An Outcomes Report

Upon review of the September 10, 2018 Commission letter and the school’s response, the Commission voted to continue Fortis-Centerville on **Warning** with a subsequent review scheduled for ACCSC’s **August 2019** meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

**Accreditation History**

The Commission considered the school’s current compliance status in context of the accreditation history described in the July 31, 2017 Team Summary Report (“TSR”) and found that longstanding issues – such as below-benchmark rates of student achievement in distance education programs – indicate that the school’s management has been unable to assess school operations to identify root causes and implement effective change.

<p><b>November 2013</b>  <b>Renewal of Accreditation</b>  <b>Application for Expansion of Distance Education</b>  <b>Application for an Academic Associate Degree Program Outcomes Report</b>  <b>Commission Review</b></p>	<p style="text-align: center;"><b>Action: Probation</b></p> <p>Due to the reported rates of student achievement and other concerns as cited in the Probation Order regarding the school’s distance education operations and programs, the Commission directed Fortis College to cease enrollment in the following distance education programs:</p> <ul style="list-style-type: none"> <li>• Criminal Justice/Homeland Security – DE (AAS)</li> <li>• Digital Graphic Design-DE (AAS)</li> <li>• Medical Administrative Assistant-DE (AAS); and</li> <li>• Medical Billing and Coding-DE (AAS)</li> </ul>
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	<p>The Commission voted to direct an Announced On-site Evaluation at the distance education separate facilities located in Winter Park, Florida and Greenwood Village, Colorado, to verify the following:</p> <ol style="list-style-type: none"> <li>(1) Management and Administrative capacity</li> <li>(2) Compliance with federal and state government requirements</li> <li>(3) Approval of separate facilities</li> <li>(4) Student achievement</li> <li>(5) Faculty qualifications</li> <li>(6) Verification of prior work experience for faculty</li> <li>(7) Program Advisory Committee</li> </ol>
<b>April 2014 Program Discontinuation</b>	ACCSC acknowledged the school's program discontinuation notification for the Digital Graphic Design-DE (AAS) degree program.
<b>May 2014 Probation Order Commission Review</b>	<p style="text-align: center;"><b>Action: Vacate Probation/Show Cause Order</b></p> <ol style="list-style-type: none"> <li>(1) Compliance with federal and state government requirements</li> <li>(2) Approval of separate facilities</li> <li>(3) Student achievement</li> <li>(4) Student Satisfaction</li> </ol>
<b>July 2014 Program Discontinuation</b>	ACCSC acknowledged the school's program discontinuation notification for the Electronics Engineering Technology (AAS) program.
<b>August 2014 Financial Structure Commission Review</b>	<p style="text-align: center;"><b>Action: System-wide Warning</b></p> <ol style="list-style-type: none"> <li>(1) Financials</li> <li>(2) Compliance with federal requirements</li> </ol>
<b>November 2014 Show Cause (Warning) Order Commission Review</b>	<p style="text-align: center;"><b>Action: Continued Warning Order</b></p> <ol style="list-style-type: none"> <li>(1) Student achievement</li> <li>(2) Student satisfaction</li> </ol>
<b>November 2014 System-wide Review Commission Review</b>	<p style="text-align: center;"><b>Action: Continued System-wide Warning</b></p> <ol style="list-style-type: none"> <li>(1) Financials</li> <li>(2) Proof of Graduation</li> <li>(3) Compliance with federal requirements/regulatory actions</li> </ol>
<b>November 2014 Program Discontinuation</b>	ACCSC acknowledged the school's program discontinuation notification for the Computer Security and Forensics (AAS), Paramedic (AAS), and Criminal Justice/Homeland Security-DE (AAS) programs.
<b>January 2015 Program Discontinuation</b>	ACCSC acknowledged the school's program discontinuation notification for the Criminal Justice (AAS) program.
<b>May 2015 Continued System-wide Warning Commission Review</b>	<p style="text-align: center;"><b>Action: Continued System-wide Warning</b></p> <ol style="list-style-type: none"> <li>(1) Financials</li> <li>(2) Proof of Graduation</li> <li>(3) Compliance with federal requirements/regulatory actions</li> </ol> <p>In addition, at the May 2015 meeting, as a separate action from the investigation of the EA-affiliated schools by the Office of Inspector</p>

	General, the Commission considered its previous decision to place Fortis College in Centerville, Ohio on Warning. The Commission is holding the final decision on the Warning in abeyance pending the resolution of the OIG matter that will be considered by the Commission at its August 2015 meeting.
<b>February 2016 System-Wide Warning Commission Review</b>	<b>Action: Vacate the System-Wide Warning and place the system on Financial Reporting</b>
<b>February 2016 Renewal of Accreditation Expansion of Distance Education Degree Programs Branch Part I Unrelated New Program Distance Education Consortium Agreement Applications for Distance Education Facility Commission Review</b>	<p><b>Action: Accredite three (3) years going forward from May 2013;</b> approve the following:</p> <ul style="list-style-type: none"> <li>• Expansion of distance education for the Registered Nurse to Bachelor of Science in Nursing-DE (BSN) program;</li> <li>• Retail Management-DE (AAB) and Web Development-DE (AAS) programs;</li> <li>• Branch campuses for Fortis College in Cutler Bay, Florida (B072358), Fortis College in Indianapolis, Indiana (B072275), and Fortis College located in Largo, Florida (B070771);</li> <li>• Medical Assisting (AS) and Paramedic (AS) programs; approve Emergency Medical Technician (diploma) and Medical Billing and Coding (diploma) programs;</li> <li>• Distance Education Consortium Agreements with Fortis College-Phoenix (B072191) and Fortis Institute (M068504)</li> <li>• Distance Education Facilities located at 6455 S. Yosemite Street, Greenwood Village, Colorado 80111 and 2699 Lee Road, Winter Park, Florida 32789</li> </ul> <p>Stipulation:          (1) Executed enrollment agreements</p>
<b>April 2016 Program Discontinuation</b>	ACCSC acknowledged the school's program discontinuation notification for the Criminal Justice (AAB), Registered Nurse to Bachelor of Science in Nursing, and Medical Coding Specialist (Diploma) program.
<b>May 2016 Special Consideration Commission Review</b>	Action: Approve request to extend term of accreditation, accept stipulation response, and accredit Fortis-Centerville four (4) years going forward from May 2013
<b>May 2016 Application for a New Program-Related</b>	ACCSC approved the school's application for the Medical Assisting (Diploma) program, effective May 12, 2016.
<b>June 2016 Program Discontinuation</b>	ACCSC acknowledged the school's program discontinuation notification for the Paralegal (AAB) program.
<b>August 2016 Financial Reporting Commission Review</b>	<b>Action: Continue system-wide Financial Reporting</b>

<b>December 2016                  Program Discontinuation</b>	ACCSC acknowledged the school’s program discontinuation notification for the Medical Assisting (AAS), Emergency Medical Technician (Diploma), and Medical Billing and Coding (diploma) program.
<b>November 2017                  Application for Renewal of Accreditation                  Application for a Distance Education Facility (Greenwood Village, Colorado and Winter Park, Florida)                  Application for an Academic Associate Degree for the Medical Billing and Coding (AAS) program                  Outcomes Report</b>	<p style="text-align: center;"><b>Action: Place on Warning</b></p> (1) Student Achievement (2) Employment Classification (3) Verifiable Records (4) State Requirements: Distance Education (5) Online Student Assessment (6) Program Objectives: Network Administration and Security program (7) Management and Administrative Capacity
	The Commission considered the July 31, 2017 Team Summary Report and the school’s response to the report. In addition, the Commission voted to cease enrollment in all fully online programs and hybrid program that had low rates for the last two years.

**February 2019**

1. Fortis-Centerville did not demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the September 10, 2018 Warning letter, using a July 2018 report date Graduation and Employment Charts, Fortis-Centerville reported the following student achievement rates. The Commission also noted the previous rates reported using a July 2017 Report Date:

Program (Credential)	Length in Months	July 2017 Reported Graduation Rate	July 2018 Reported Graduation Rate	ACCSC Benchmark Graduation Rate	July 2017 Reported Employment Rate	July 2018 Reported Employment Rate	ACCSC Benchmark Employment Rate
Dental Assisting (Diploma)	12	50%	54%	55%	73%	67%	70%
Heating, Ventilating, Air Conditioning, and Refrigeration (Diploma)	9	53%	77%	60%	75%	76%	70%
Network Administration and Security (AAS) <sup>1</sup>	18	38%	33%	47%	0%	75%	70%
Nursing (AAS)	24	38%	56%	40%	85%	78%	70%

<sup>1</sup> Formerly titled Cyber Security.

Practical Nursing (Diploma)	15	41%	52%	50%	86%	88%	70%
<b>ACTIVE DISCONTINUED PROGRAM</b>							
Business Management – DE (AAB) <sup>2</sup>	19	33%	43%	43%	51%	38%	70%

The Commission found that Fortis-Centerville reported the (red) highlighted student achievement rates that fall below ACCSC’s student achievement benchmark rates.<sup>3</sup> The school currently offers six active programs and has one remaining program as active/discontinued. The Commission acknowledges Fortis-Centerville’s progress in achieving to meet or exceed graduation and employment benchmark rates in the Heating, Ventilating, Air Conditioning, and Refrigeration (Diploma) Nursing (AAS), and Practical Nursing (Diploma) programs. The school reported below-benchmark rates of graduation and/or employment for two of those six programs, as outlined below:

**Dental Assisting (Diploma)**

The school’s response to the September 10, 2018 letter identifies strategies related to improving overall retention in the Dental Assisting program, including providing community resources such as childcare and transportation, additional academic advising, student questionnaires to identify potential obstacles for students, and hiring new program leads. Fortis-Centerville also provided strategies to improve the employment rate including employment preparation workshops, continuous contact and communication from Career Services with the student through graduation, Career Services outreach to local employers, and graduate employment exit interviews. The Commission found that additional monitoring is warranted in order to assess the impact of the school’s ongoing efforts to improve student achievement outcomes in the Dental Assisting program.

**Network Administration and Security (AAS)**

This program, delivered in a hybrid format, was approved as “Cyber Security and Forensics (AAS) in February 2011. Fortis-Centerville previously decided to review and revise the program, including changing the title to Network Administration and Security, and redesigning seven (7) courses within the program to specifically target areas related to information technology with an emphasis on system and network security. ACCSC approved the modifications to the program in April 2018. In response to the September 10, 2018 letter, Fortis-Centerville stated that the school planned to enroll students under the new program name beginning in January 2019. Fortis-Centerville also stated that the previous version of the program, Cyber Security and Forensics currently has 14 active students and the school continues to implement strategies to retain those students and support the students through graduation and employment. Strategies include providing students with community resources, hiring new faculty, helping student self-identify obstacles, conducting required advising sessions, and documenting advising through increment module assessment forms, and implementing study guides.

In addition, the September 11, 2018 letter required Fortis-Centerville to demonstrate that the revised program, including the curriculum, course objectives, and learning materials align with the new name

<sup>2</sup> The school indicated on the Programmatic Teach-out form that the last cohort of students will graduate from the program August 2019.

<sup>3</sup> Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

and defined employment outcomes and that students are adequately prepared by the revised curriculum to obtain the newly-defined educational objectives of the program. In response, Fortis-Centerville described the new education objectives and the related occupations relative to each objective. Overall, the school explained that the Network Administration and Security program prepares students for entry-level positions related to computer and information analysis and network security and the seven (7) new courses provide specific focus on the computer, information technology, and network security areas. Fortis-Centerville also stated that the school plans to implement the same strategies to improve student achievement rates for the Network Administration and Security program as the school implemented for the previous Cyber Security and Forensics program. In addition, Fortis-Centerville stated given the Network Administration and Security program does not have enrollments, the school was unable to provide retention data; however, the school provided a Retention Chart for the Cyber Security and Forensics program that reported a 64% retention rate. Given that the Network Administration and Security program had no enrollments at the time of the school's response to the September 11, 2018 letter, the Commission is interested in the status of the program, including total enrollments and reported retention data. The Commission is also interested in monitoring Cyber Security and Forensics program through the conclusion of the program and the status of the remaining 14 students.

Furthermore, the Commission noted that the following six programs as listed in the September 10, 2018 Warning letter as "Active-Discontinued" programs are currently inactive as the last cohort of students for each program graduated in February 2019 and March 2019.

- Accounting Technology-DE (AAB): 19 remaining students
- Human Resources Management-DE (AAB): 66 remaining students
- Internet Marketing-DE (AAB): 8 remaining students
- Medical Assisting (AAS): 8 remaining students
- Medical Billing and Coding (AAS): 4 remaining students

The Commission is interested in monitoring the teach-out of the aforementioned programs during the programs' conclusions to ensure that Fortis-Centerville remains attentive to the graduation and employment needs of the remaining students.

Additionally, Fortis-Centerville indicated in the school's Programmatic Teach-out Plan Approval form that the last class will graduate from the Business Management-DE (AAB) program in August 2019 and that the program has 83 remaining students. The Commission is interested in monitoring the graduation and employment rates of the program and ensuring that the school remains attentive to the graduation and employment needs of the remaining students.

The Commission recognized that the school took action to discontinue poorly performing programs, including all fully online program offerings, and implemented an array of strategies to improve performance in the remaining programs. Given the continued low graduation and employment rates of the Dental Assisting (Diploma) program, however, the Commission determined that additional monitoring is warranted. In addition, the Commission is interested in monitoring the student achievement rates of the Cyber Security and Forensics (AAS) and Business Management-DE (AAB) programs through the conclusion of the programs and an update regarding enrollment numbers and reportable retention data for the Network Administration and Security (AAS) program.

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

- a. For the Accounting Technology-DE (AAB); Human Resource Management (AAS); and Internet Marketing-DE (AAS); Medical Assisting (AAS); Medical Billing and Coding (AAS), and Business Management-DE (AAB) programs, provide the following:
  - i. An update of the students listed in the Teach Out Plan Approval Form for the aforementioned programs as follows:

Student ID#	Program	Graduation Date	Withdrawal/Termination Date	If Active, Expected Graduation Date

- ii. For each graduate from the chart above (item i.) that obtained training-related employment, provide the following information:

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

- b. A Graduation and Employment Chart for the Dental Assisting (Diploma) program and the Cyber Security and Forensics (AAS) program using a **July 2019 Report Date**;
- c. For each Graduation and Employment Charts submitted, provide supporting summary information for the graduation and employment data organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
  - i. For each student reported provide the following information:

Student ID#	Program	Start Date	Graduation Date	Withdrawal/Termination Date

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

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

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

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

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

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

- d. For each program for which the reported rates of student graduation or graduate employment, do not meet the ACCSC benchmark, 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; and
- e. For the Dental Assisting (Diploma), Cyber Security and Forensics (AAS), and Network Administration and Security (AAS) programs, the following contemporaneous data:
  - i. An **ACCSC Retention Chart** to show more recent data with regard to retention and
  - ii. A list of graduates from each program for the last six months and employment information, in the following format:

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

2. Fortis-Centerville must demonstrate that the school assesses whether students have the skills, competencies, and access to technology necessary to succeed in a distance education environment prior to their enrollment in the program (*Section IX (E)(2), Substantive Standards, Standards of Accreditation*). The September 10, 2018 Warning letter questioned the effectiveness of the distance education assessment tool in that the school did not demonstrate that the assessment tool addressed the students’ skills and competencies with regard to distance education. In response, Fortis-Centerville provided a summary of the methods that the school previously used to assess students’ technical skills, competencies, and access to technology. Fortis-Centerville stated that the school previously conducted student interviews and online student orientations. The school explained that during the admission process the school provides the prospective online student with a questionnaire that asks whether the student has access to a computer and the internet. The questionnaire also has two separate sections asking the student to rate his/her ability to utilize computers. There is also a section asking the student a series of questions regarding motivation and asking the student to rate seven different soft skill areas, for example:

- *Rate your personal motivation:*
- *Rate your work ethic:*
- *Rate your critical thinking skills:*

Fortis-Centerville’s response also states that the school utilizes an Online Technology Skills Assessment (“OTSA”) that the school requires all prospective online students to complete with a score of 65% or higher. The school provided a copy of the OTSA consisting of 25 questions, which includes multiple-choice questions, for example:

- *When communicating with my online instructor, I would use the following:*
- *The following are examples of computer software:*
- *If I needed to move text or an image from one location in a document to another, I would use the following function:*
- *It is possible to run more than one program on a computer at a time:*

While the Commission recognized the efforts to improve the assessment process and tools utilized during the admissions process, the OTSA appears to assess only a student's ability to utilize technology and focuses on knowledge of basic computer concept. The OTSA again fails to be an assessment that addresses the students' skills and competencies with regard to distance learning and does not include questions that would allow the school to determine if a student's learning style is conducive to distance education. In addition, it is not clear that answering 17 of the 25 technology-based questions correctly is a sufficient indicator of an applicant's ability to succeed. The Commission expects the assessment to include questions that will determine if in fact an online learning environment is appropriate for a particular student through assessing a student's ability to access and use online course content in a meaningful way, communicate and participate through online courses, and complete online projects and assignments that are key to the student's success in the program. In context of student achievement outcomes that continue to fall below the Commission's benchmark rates and the previous history of underperforming distance education programs, the Commission is interested in ensuring that online students are capable of benefitting from the training offered at the school.

In addition, in response to the September 10, 2018 letter, Fortis-Centerville stated the following:

*In early 2018, the College decided to teach-out all programs delivered fully online. No new students have been enrolled in fully online programs since March 2, 2018, and therefore no assessment of technical skills, competencies, and access to technology necessary to succeed in the online environment is currently being utilized for the distance education programs.*

The Commission recognized that Fortis-Centerville discontinued all fully online programs and has not admitted students into fully online programs since March 2018. Fortis-Centerville, however, did not make clear if hybrid versions of the school's programs<sup>4</sup> remain and if the school enrolls new students into remaining hybrid versions of the school's programs. Fortis-Centerville also did not indicate the school's plans to continue offering hybrid programs in the future. The school must continue to assess prospective distance education students' technical skills, competencies, and access to technology necessary to succeed in a distance education environment prior to their enrollment using the methods as the schools describes in its response if the school chooses to continue to offer hybrid programs. Given the uncertainty regarding if Fortis-Centerville is currently or plans to enroll students in hybrid programs, the Commission is interested in clarification from the school regarding the school's plans to offer hybrid distance education and therefore is also interested monitoring the school's online assessment method and processes for prospective online students.

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

- a. A narrative regarding if the school currently offers a hybrid version of one for more of the school's programs currently approved for hybrid and the schools plans to offer hybrid programs in the future;
- b. A revised copy of the current methods or assessment tool the school uses to assess the student's technical skills, competencies, and access to technology necessary to succeed in a distance education environment that includes questions that determines if students learning style is conducive to online learning and online course work;
- c. An analysis of the effectiveness of the school's assessment methods described in (b) above; and

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<sup>4</sup> Based on the Commission's records, the Commission previously granted Fortis-Centerville approval to offer the Cyber Security and Forensics (AAS) (currently titled Network Administration and Security (AAS), Nursing (AAS) and Practical Nursing (Diploma) programs via hybrid.

- d. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements.
3. Fortis-Centerville must demonstrate that the school has adequate management and administrative capacity with the demonstrated ability to lead and manage a postsecondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). In the September 10, 2018 letter, the Commission determined that the overall performance of the institution, particularly concerning student achievement outcomes and the lack of success of the distance education programs raised questions regarding whether the school is adequately managed. In response, Fortis-Centerville provided a description as to how the school adequately manages the school and ensures that the school meets all obligations relative to students and meeting accrediting standards. Fortis-Centerville described the school's core values and a list of all campus management and administrative staff and corporate staff. Fortis-Centerville listed full time school management that includes the Campus President, Dean of Education, Dean of Nursing, Director of Admissions, Senior Director of Financial Aid, Director of Career Services, Director of Institutional Effectiveness and Compliance, and Registrar and described how each individual helps to meet the obligations of students and enhances the quality of education of the institution.

Fortis-Centerville also provided a chart listing all primary campus management and administrative staff and corporate staff. From the chart, the Commission noted 19 management and administrative staff and of these 19 staff, ten (10) staff members have been employed in their current positions for less than one year and three (3) staff members have been employed in their current position for exactly one year. The chart also indicates that several staff members were employed in different positions for Education Affiliates and while these individuals hold new current positions; the staff members have previous tenure with the Educational Affiliates. In addition, of the eleven (11) management and administrative staff listed as corporate staff, five (5) staff members have been employed in the current positions for less than two years. Given the high number of management and administrative staff that have been in their current positions for less than two years, the Commission remains interested in monitoring the progress of the school's initiatives to retain current staff and promote management and staff retention.

Additionally, Fortis-Centerville provided a recent assessment regarding the retention of management and staff and a description of the strategies the school implemented including conducting annual employee satisfaction surveys, regimented candidate selection and interviewing process, Planning Committees that focus on staff improvements, and providing ongoing recognition to staff. The Commission recognized Fortis-Centerville's efforts to improve its management and administrative staff capacity and that the school appears to have an adequate number of primary management and staff to support the institution and meet the needs of students. However, given the high number of staff who are new to their current positions and the newly implemented strategies to retain these staff, the Commission is interested in an update regarding staff retention and the success of the implemented strategies to ensure the school's continuity of management.

Based on the foregoing, the Commission directs the school to submit the following:<sup>5</sup>

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

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

- b. An update on the strategies that the school has implemented to improve retention of management and administration staff; and
- c. The school's most recent assessment regarding the retention of the management and administrative staff and a description of the success of the strategies identified in (b.) above.

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**Warning Restrictions:**

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

**Response Requirements:**

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

Fortis-Centerville must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.<sup>6</sup> If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

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

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<sup>5</sup> The Commission will take the totality of the school's response to this Warning Order into consideration when evaluating the ability of the school's managers to lead and manage a postsecondary institution in compliance with accrediting standards.

<sup>6</sup> 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](http://www.accsc.org).

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 June 13, 2019**. If a response, the required fee<sup>7</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 13, 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 further assistance or additional information, please contact [REDACTED] or via e-mail at [REDACTED]

Sincerely,

[REDACTED]  
Michale S. McComis, Ed.D.  
Executive Director

c: [REDACTED]  
[REDACTED]

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<sup>7</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.