



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

July 5, 2017

ELECTRONIC DELIVERY

David Snyder
President
Keystone Technical Institute
2301 Academy Drive
Harrisburg, Pennsylvania 17112

School #M001336

Dear Mr. Snyder:

At the June 2017 meeting the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the record at the time of closure for Keystone Technical Institute (“KTI”) located in Harrisburg, Pennsylvania to include:

- A letter received on May 16, 2017 notifying the Commission that KTI had ceased operation effective May 7, 2017;
- A letter dated May 18, 2017 from the Commission to KTI providing the school an opportunity to demonstrate with evidence that an acceptable teach-out plan was in fact executed despite the school’s failure to notify ACCSC of the school’s closure in advance as required; and
- KTI’s response to the May 18, 2017 letter.

Upon review of the afore-listed information, the Commission determined that KTI did not submit or receive approval of a teach-out plan prior to the school’s closure and the school’s efforts to effectuate a teach-out after the school closed notwithstanding, KTI failed to demonstrate that the school in fact executed an orderly teach-out of students in a manner that would have been accepted by ACCSC prior to the closure.

Section VII (P)(5) and Section VII (Q)(5) Rules of Process and Procedure, Standards of Accreditation state that a school will be considered to have had its accreditation withdrawn if the school closes without notification or closes without an ACCSC approved teach-out plan that the school faithfully executes. Accordingly, the Commission considers KTI as having its accreditation withdrawn by ACCSC effective May 7, 2017.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reasons for the Withdrawal are made public and provided to the U.S. Department of Education, appropriate state agencies, and appropriate accrediting agencies. Moreover, any owner or school manager shall be responsible for disclosing his or her affiliation with a school that had its accreditation withdrawn in any future application for accreditation or application to participate in any federal or state student financial aid program as may be requested or required.

TEACH-OUT PLAN

Pursuant to federal law, an accrediting agency recognized by the U.S. Department of Education must require a teach-out plan from an institution subject to an adverse accreditation decision to withdraw accreditation. Although the school is closed, in the Commission’s estimation the school’s responsibility to ensure the completion of each student’s training program has not ceased. Therefore, in accordance with *Section IV (F)(1)(c) Rules of Process and Procedure, Standards of Accreditation* the Commission requires

that KTI submit an updated completed ACCSC Institutional Teach-Out Plan Approval Form,¹ **on or before July 21, 2017.**

APPEAL AND REAPPLICATION PROCESS AND PROCEDURE

KTI may opt to appeal the Commission's decision to withdraw accreditation. Details regarding the appeal procedures are outlined in the *ACCSC Rules of Process and Procedures, Standards of Accreditation*.

- If the school elects to appeal this withdrawal, the school must sign and return the enclosed Letter of Intent to Appeal a Commission Decision, along with the Appeal Expense Fee of \$6,000.00, **on or before July 17, 2017.**
- If the school elects to appeal this withdrawal, the school's Application for Appeal of a Commission Decision and Grounds for Appeal must be submitted **on or before August 4, 2017**
- If the school elects not to appeal this withdrawal, the Commission's decision to withdraw the school's accreditation as of **May 7, 2017** will become final. The school may submit comments **on or before July 17, 2017** in accordance with the enclosed Public Comment Disclosure Form. Comments submitted by a school will accompany any public disclosure of a final Commission action pursuant to *Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation*.

For additional information regarding the Commission's decision, please contact me directly at 703.247.4520 or mccomis@accsc.org.

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c: U.S. Department of Education
Pennsylvania DOE/Bureau of Postsecondary and Adult Education/Division of Higher and Career Education

Encls: Letter of Intent to Appeal a Commission Decision
Standing Appeals Panel Members
Public Comment Disclosure Form

¹ Available online at: <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>



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LETTER OF INTENT TO APPEAL A COMMISSION DECISION

To Be Submitted No Later Than July 17, 2017

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

Dear Dr. McComis:

This letter serves to provide notice that Keystone Technical Institute intends to appeal the recent decision of the Commission to revoke the school’s accreditation and remove the school from the list of ACCSC-accredited institutions. Attached is a check in the amount of \$6,000 as required by accreditation procedures. I understand that this fee is non-refundable.

I understand that the ACCSC Appeals Panel will meet to consider the appeal of the school and that I will receive final confirmation of the hearing at a later date. I have reviewed *Section VIII, Rules of Process and Procedures of the Standards of Accreditation* pertaining to appeals and noted that I am entitled to a transcript of the proceedings and to have representatives, including legal counsel, present with advance notification to ACCSC.

I understand that it is the right of the a school to appeal an adverse action taken by the Commission on the grounds that the decision was arbitrary, capricious, or otherwise in substantial disregard of the criteria or procedures of the Commission, or not supported by substantial evidence in the record on which the Commission took the action (*Section VIII (B), Rules of Process and Procedures, Standards of Accreditation*). I understand that because the appeal must be based on evidence in the record at the time that the Commission took the adverse action, no new evidence may be submitted during the appeal process, other than information related to the financial solvency and condition of the school.

I understand it is the right of a school intending to appeal a Commission decision to indicate whether there is good cause as to why any member of the Commission’s Standing Appeal Panel should not hear the appeal. I have reviewed the list of Standing Appeal Panel members and have included with this notice any objections to any member of the Standing Appeal Member with the reasons and cause why I believe a member should not hear the school’s appeal. I understand the absence of a submission with this notice indicates my approval to allow any member of the Standing Appeal Panel to sit for the school’s appeal.

I understand that the Application for Appeal of Commission Decision with the school’s Grounds for Appeal are due to ACCSC **on or before August 4, 2017**, and I agree to submit that material on or before that date. I understand that failure to submit these required documents by the due date could prevent consideration of the school’s appeal.

Signature

Date

Name/Title



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ACCSC Standing Appeals Panel Members

Panel Member	Affiliation	Term Ending
Gary Baker	U.S. Department of Education (Retired) Springfield, Virginia <i>Public Member</i>	2019
Paul Bott, Ed.D.	Pacific College Costa Mesa, California <i>Public Member</i>	2020
Nancy Bradley	Daytona College Ormond Beach, Florida <i>School Member</i>	2020
Mary Cano	Western Technical College El Paso, Texas <i>School Member</i>	2018
Paul Fitzgerald	Erie Institute of Technology Erie, Pennsylvania <i>School Member</i>	2019
Lorne P. Gauthier	Northwest Technological Institute Southfield, Michigan <i>School Member</i>	2017
William James	U.S. Department of Education (Retired) Fairfax, Virginia <i>Public Member</i>	2019
Timothy McMahon	Triangle Tech Pittsburgh, Pennsylvania <i>School Member</i>	2020
Kathleen J. Steinberg	Midwest Technical Institute Lincoln, Illinois <i>School Member</i>	2018
Raymond Tuttle, Ph.D.	University of Mary Washington Fredericksburg, Virginia <i>Public Member</i>	2020



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PUBLIC COMMENT DISCLOSURE FORM

To Be Submitted No Later Than July 17, 2017

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

RE: Keystone Technical Institute
2301 Academy Drive
Harrisburg, Pennsylvania 17112

Dear Dr. McComis:

I understand and agree that the Commission, pursuant to *Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation*, will make public a summary of the reasons for the decision together with any comments submitted by the school. I further understand that the summary will be accompanied by the attached comments.

I understand and agree that the attached comments constitute Keystone Technical Institute’s public comments on the adverse accreditation action that are to be disseminated with the public notice of the Commission’s decision effective May 7, 2017 including, but not limited to, posting to the ACCSC website (*Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation*).

I understand and agree that the school is not obligated to submit public comments and acknowledge that the attached comments are provided voluntarily.

I understand and agree that the public comments must be in summary format and that the comments must be limited to two type written pages (no smaller than 11 pt. font with one inch margins). I acknowledge that any comments which do not meet these requirements will not be disseminated or posted along with the summary of the reasons for the adverse accreditation decision.

I understand and agree that the Commission will release its summary of the adverse accreditation decision to the public pursuant to *Section X (D)(3), Rules of Process and Procedure, Standards of Accreditation* and that the school’s written comments will not be added to this disclosure if this form and comments are not submitted in the required format **on or before July 17, 2017.**

I understand and agree that the Commission has no responsibility for how the school’s comments may be used once they are put in the public domain.

Signature

Date

Name/Title