



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

December 19, 2017

ELECTRONIC DELIVERY

██████████
Campus President
Antonelli College
2323 Lakeland Drive
Jackson, Mississippi 39232

School #B070138
Continued Warning

Dear ██████████

At the November 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to continue Antonelli College located in Jackson, Mississippi on Warning. Upon review of the March 14, 2017 Warning letter and the school’s response, the Commission voted to take the following actions:

1. Revoke the approval for the Business Management-DE (AAB) program and direct the school to submit a Programmatic Teach-Out Approval Form for this program (*Section VII (R)(7), Rules of Process and Procedure, Standards of Accreditation*);
2. Continue the directive for Antonelli College to cease enrolling students in all of the school’s 100% Distance Education programs; and
3. Continue the school on Warning due to the reported student achievement rates that continue to fall below the Commission’s benchmarks with a subsequent review scheduled for ACCSC’s May 2018 meeting.

The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commission Review:

The Commission took note of the following history regarding Antonelli College:

- At the May 2013 meeting, the Commission considered Antonelli College’s Application for an Occupational Associate Degree Program for the Marketing and Social Media Management (AAB) program and supplemental 2012 ACCSC Annual Report graduation and employment rate information and voted to defer final action until the November 2013 meeting. Specifically, the Commission found that the school reported graduation rates for the 24-month Business Management-DE (AAB); 24-month Financial Management-DE (AAB); and 24-month Interior Design (AAB) programs and graduation and employment rates for the Medical Billing and Coding-DE (AAS) program that fell below ACCSC’s benchmark rates.
- At the November 2013 meeting, the Commission determined that Antonelli College met the requirements for the addition of the Marketing and Social Media Management (AAB) program. The Commission also voted to place the school on Outcomes Reporting for the Business Management-DE (AAB); Financial Management-DE (AAB); and Medical Billing and Coding-DE (AAS) programs.
- At the February 2015 meeting, the Commission considered Antonelli College’s Application for Renewal of Accreditation; Application for an Occupational Associate Degree Program for the Sales Management-DE (AAB) program; Outcomes Report; and supplemental 2014 ACCSC Annual Report student achievement information and voted to grant the school renewal of accreditation for four (4) years. The Commission also determined that the school met the requirements for the addition of the

Sales Management-DE program within the school’s scope of accreditation. Additionally, the Commission voted to continue Antonelli College on Outcomes Reporting for the Business Management-DE (AAB); Financial Management-DE (AAB); Medical Billing and Coding-DE (AAS); and Paralegal Studies (AAB) programs.

- At the December 2015 meeting, the Commission considered Antonelli College’s Outcomes Report and voted to place the school on Warning due to the history of the school reporting student achievement rates for distance education programs that fell below the Commission’s benchmark rates. The Commission also directed the school to cap enrollment in the Medical Billing and Coding-DE (AAS) program.
- At the August 2016 meeting, the Commission voted to continue Antonelli College on Warning as the school reported student achievement rates for the Business Management-DE (AAB); Financial Management-DE (AAB); Medical Billing and Coding-DE (AAB); and Paralegal Studies-DE (AAB) programs that fell below the Commission’s benchmark rates. Antonelli College also stated that the school would no longer offer the Medical Billing and Coding-DE program; however, the school did not submit a Programmatic Teach-Out Plan Approval Form.
- At the February 2017 meeting, the Commission directed Antonelli College to cease enrolling students in all of the school’s 100% Distance Education programs and voted to continue the school on Warning due to low reported student achievement rates for most of the school’s 100% distance education programs and the Dental Assistant (AAS) program.

November 2017 Commission Review:

Antonelli College must demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provides education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the Commission’s March 14, 2017 Warning letter, using an August 2017 Report Date on the Graduation and Employment Charts, Antonelli College reported the following student achievement rates:

Program (Credential)	Length in Months	Antonelli Graduation Rate	ACCSC Benchmark Graduation Rate	Antonelli Employment Rate	ACCSC Benchmark Employment Rate
Business Management-DE (AAB)	19	20%	43%	100%	70%
Dental Assisting (AAS)	19	67%	42%	0%	70%
Financial Management-DE (AAB)	19	43%	43%	100%	70%
Information Technology-DE (AAB)	19	57%	43%	100%	70%
Marketing & Social Media Management-DE (AAB)	19	67%	43%	100%	70%
Paralegal Studies-DE (AAB)	19	41%	43%	88%	70%

The Commission found that Antonelli College reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.¹ In particular, the Commission noted the following graduation rates for the Business Management-DE (AAB) program:

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

	July 2012 Report Date	Feb. 2013 Report Date	Aug. 2013 Report Date	Oct. 2014 Report Date	July 2015 Report Date	July 2016 Report Date*	Nov. 2016 Report Date	Aug. 2017 Report Date
Graduation Rate	25%	11%	21%	15%	14%	29%	40%	20%
Benchmark Rate	36%	36%	36%	36%	36%	43%	43%	43%

* Prior to the Graduation & Employment Chart using a July 2016 Report Date, the school reported the Business Management-DE program as 24 months in length.

As part of the response, Antonelli College also provided Retention Charts using a December 2016 and an August 2017 Report Date. For the chart using a December 2016 Report Date, the Commission noted that the school retained only 23% (20 of 88) of Business Management-DE (AAB) students that started between October 2015 and October 2016. While the school’s latest Retention Chart using an August 2017 Report Date for students that started between July 2016 and May 2017 shows an improved retention rate of 39% (25 of 64). Thus, even in the unlikely scenario that no remaining students withdraw from the Business Management-DE (AAB) program (based on the program’s history), the graduation rate would still fall below the Commission’s benchmark rate. Therefore, while the Commission recognized the school’s efforts to enhance student achievement for the Business Management-DE (AAB) program, the Commission cannot overlook that the school has continually, over the previous five years, reported below benchmark graduation rates. Of particular concern is that despite the school’s efforts to improve the reported rates of student achievement, the graduation rate decreased from 40% for students on the Graduation and Employment Chart using a November 2016 Report Date to 20% for students on the Graduation and Employment Chart using an August 2017 Report Date, currently falling 23% below the established graduation benchmark rate of 43%.

The Commission determined that Antonelli College has failed to meet its burden to demonstrate successful student achievement in the Business Management-DE (AAB) program. Moreover, given the school’s poor student achievement history for the Business Management-DE (AAB) program, the Commission concluded that the school’s analysis of outcomes and the strategies to improve graduation rates did not provide evidence or a cogent solution to demonstrate that the school can operate this program in compliance with standards in a sustainable manner. In consideration of these factors, the Commission determined that in order to be responsible to students it cannot allow the school to continue to enroll students in this program and therefore **voted to revoke the approval of the Business Management-DE (AAB) program** in accordance with *Section VII (R)(7), Rules of Process and Procedure, Standards of Accreditation.*²

As part of the response, Antonelli College identified the reasons why most distance education students withdraw as personal and family demands; the inability of students to make tuition payments; time management challenges; and the lack of dependable internet access. Therefore, the school described initiatives to improve graduation rates including plans to revise the enrollment process to incorporate the “SmarterMeasure Readiness Assessment” and thoroughly train admissions representatives about this process. Antonelli College indicated that the “admission team will focus on enrolling only students who have shown to be fully prepared and motivated for the distance education platform and their chosen program” through probing questions, a “Success Interview,” and ensuring that students have dedicated

² Please note that if the school reapplies for the Business Management-DE program, given the history of low rates of student achievement for this program, Antonelli College must demonstrate to the Commission a likelihood of student achievement, that the program and the school’s support of this program has been fundamentally enhanced from the current program offering, and that sufficient procedures to support student graduation are present. Additionally, Antonelli College will be required to demonstrate as part of an application 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 develop a plan as to how the school will ensure these rates for any revised program will demonstrate successful student achievement.

internet access. The school also revised the required online orientation and redesigned the Financial Aid Award Letter and payment plan information so that students will make up-front payments during the enrollment process and remain on a payment plan throughout the program. Additionally, Antonelli College increased tutoring assistance availability; increased faculty training; created a mobile platform for the Learning Management System; and added “Live Classroom” to the distance education courses.

In the March 14, 2017 letter, the Commission directed Antonelli College to submit Retention Charts using a December 2016 and an August 2017 Report Date. For the active 100% distance education programs, Antonelli College reported the following retention rates:

Program	December 2016 Report Date	August 2017 Report Date	Retained Students as of 50% Program Completed for August 2017 Report Date
Financial Management-DE (AAB)	40%	50%	0% (0 of 2)
Information Technology-DE (AAB)	19%	13%	0% (0 of 3)
Marketing and Social Media Management-DE (AAB)	0%	40%	0% (0 of 3)
Paralegal Studies-DE (AAB)	21%	32%	29% (2 of 7)
Sales Management-DE (AAB)	0%	50%	0% (0 of 1)
Totals	23% (16 of 70)	35% (16 of 46)	13% (2 of 16)

The Commission reviewed this information in comparison to the Graduation and Employment Charts provided (see details above) and noted that, other than the graduation rate for the Paralegal Studies-DE program, the school reported graduation rates for these programs that meet ACCSC’s benchmark rates. Thus, it appears that student retention is trending in downward. The Retention Charts particularly demonstrate this downward trend because of the overall retention rates reported on the August 2017 chart, the retention rate is derived almost solely from students who have yet to reach the mid-point of the program. The school has only retained 2 of 16 students (12.5%) at the midpoints of these programs. Given this rate of attrition, it is highly unlikely that the school will be able to report graduation rates at or above the Commission’s benchmark rate in the future. As such, the Commission remains concerned about the retention trends and Antonelli College’s inability to consistently report graduation rates for the school’s 100% distance education programs that meet ACCSC’s benchmark rates. Based on the retention data and the school’s history of reporting student achievement rates for distance education program that fall below ACCSC’s benchmark rates, the Commission determined that the school has yet to demonstrate stability in the success of students in the distance education programs. Accordingly, the Commission voted to continue to direct Antonelli College to cease enrollment in the school’s 100% distance education programs and plans to monitor the status of the school’s distance education programs at the May 2018 meeting.

Antonelli College also provided information for the Dental Assisting (AAS) program, indicating that this program “continues to be a viable choice for students seeking a degree in the field.” The school attributed the low employment rate to students transferring from the AAS program to the Diploma program, “leaving a small cohort in the AAS program.” The Commission noted, however, that the school reported only six student starts on the Graduation and Employment with one student transferring to another program. Antonelli College also indicated that the school has historically reported employment rates for the Dental Assisting (AAS) program that exceed ACCSC’s benchmark rate. While the school stated that there is a demand for Dental Assistants in the community, Antonelli College did not provide information regarding initiatives to improve the employment rate for the AAS program.

Finally, in the March 14, 2017 Warning letter, the Commission directed Antonelli College to submit information for the discontinued Medical Billing and Coding-DE (AAS) program. In the response, the school listed 23 graduates since January 1, 2017, but only 6 of these 23 students gained training-related

employment. The Commission reminds the school to continue to provide graduate employment assistance for students of discontinued programs.

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

- a. An [ACCSC Programmatic Teach-Out Plan Approval Form](#) for the Business Management-DE program.
- b. An updated description of the factors impacting successful student achievement in the distance education programs and the Dental Assistant (AAS) program, an updated description of the strategies implemented to overcome those factors, and an analysis and assessment of the effectiveness of the school’s efforts.
- c. A description of the career services available for Medical Billing and Coding-DE (AAS) and Business Management-DE (AAB) program students and graduates.
- d. A list of Medical Billing and Coding-DE (AAS) and Business Management-DE (AAB) program students as of September 1, 2017 with their current status:

Student Name	Current Status (Active, Graduate, Withdrawn)	Graduation Date	Withdrawal/Termination Date

- e. For each Medical Billing and Coding-DE and Business Management-DE graduate from the chart above (item c.) that obtained training-related employment, 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 ³ (i.e., graduate or employer)

- f. Retention Charts for all active 100% Distance Education programs using an **August 2017 Report Date** and **February 2018 Report Date**. Please accompany the Retention Charts with a trend analysis between the two charts and of the programmatic retention rates in context of the effectiveness of the school’s retention efforts.
- g. Graduation and Employment Charts for the all active 100% Distance Education programs and the Dental Assistant (AAS) program using a **March 2018 Report Date**.
- h. 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 field⁴ (line #14), provide the following information:

³ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

⁴ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

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 (i.e., graduate or employer)

- iv. Supporting and verifiable documentation or a narrative justification for each graduate in (iii.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.
- v. 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

- vi. From the list in (iii.) 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

- vii. 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

- i. 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.

Pursuant to *Section VII (R), Rules of Process and Procedures, Standards of Accreditation* the Commission may take a programmatic action to require a school to cease enrollment in a program or may suspend or revoke the approval of a program when a program fails to demonstrate acceptable rates of student achievement.

Warning Restrictions and Notification to Students:

Pursuant to *Section VII (K)(8), 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.

The Commission requires the schools to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order within five (5) days of the receipt of this letter (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*). The school must provide evidence that the notification to current students has been made and that notification to prospective students is being made in all instances.

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.

Antonelli College 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.

Antonelli College 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 30, 2018**. If a response, the required fee,⁶ and the certificate of attesting to the accuracy of the information are not received in the Commission's office **on or before March 30, 2018**, the Commission will consider further appropriate action.

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

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

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c:

[REDACTED] [REDACTED]
[REDACTED] [REDACTED]
[REDACTED] [REDACTED]

⁵ ACCSC has issued the first 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 prior to formulating its response to this letter. More information is available under the [Resources section](#) at www.accsc.org.

⁶ ACCSC assesses a \$500 processing fee when a school is placed on Warning.