



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

March 8, 2018
Corrected copy - March 9, 2018¹

ELECTRONIC DELIVERY

██████████
Acting Director
CEM College
1206 13th Street Ext. San Agustin
San Juan, Puerto Rico 00926

School #M055217
Warning

Dear ██████████

At the February 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to vacate the Warning action and defer final action on the Application for Renewal of Accreditation, Application for a Degree Program in Medical Emergencies (AS), and Outcomes Report submitted by CEM College (“CEM-San Juan”) located in San Juan, Puerto Rico. Upon review of March 8, 2017 Commission letter and the school’s response, the Commission voted to again place the school on **Warning** with a subsequent review for ACCSC’s **May 2018** meeting. The reasons for the Commission’s decision and the Commission’s requirements for CEM-San Juan to demonstrate compliance are set forth below.²

HISTORY OF THE COMMISSION’S REVIEW

At the August 2016 meeting, the Commission reviewed the April 12, 2016 Team Summary Report for the Application for Renewal of Accreditation and Application for an Academic Associate Degree Program in Medical Emergencies (AS) in conjunction with actions at the other CEM College campuses and voted to place CEM-San Juan on Warning to be reviewed at the February 2017 meeting.

At the February 2017 meeting, the Commission reviewed the response to the September 27, 2016 Warning letter and voted to vacate the Warning action and to defer CEM-San Juan with a subsequent review for ACCSC’s November 2017 meeting. Due to Hurricanes Irma and Maria, the Commission decided to extend the response due date and adjust the subsequent review for ACCSC’s February 2018 meeting.

FEBRUARY 2018 REVIEW

1. CEM-San Juan must demonstrate successful student achievement by reporting acceptable rates of student graduation and employment in the career field for which the school provided education that are supported by verifiable documentation as well as acceptable licensure pass rates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to March 8, 2017 Commission letter, using a July 2017 Report Date on the Graduation and Employment Charts, CEM-San Juan reported the following student achievement rates:

Program Title (credential)	Program Length	CEM Reported Graduation Rate	ACCSC Benchmark Graduation Rate	CEM Reported Employment Rate	ACCSC Benchmark Employment Rate
Practical Nursing (Diploma)	12	66%	55%	70%	70%

¹ Corrected copy issued on March 9, 2018 to reflect the inclusion of the Warning restriction and notification language.

² The accreditation process provides an opportunity for an institution to demonstrate its commitment to continuous improvement. Accordingly, the Commission’s final decision letter on this matter will include an ACCSC Institutional Enhancement Enclosure which lists suggestions deserving the school’s immediate attention and action.

Program Title (credential)	Program Length	CEM Reported Graduation Rate	ACCSC Benchmark Graduation Rate	CEM Reported Employment Rate	ACCSC Benchmark Employment Rate
Nursing Sciences (AS)	24	55%	40%	72%	
Pharmacy Technician (AS)	24	47%	40%	71%	
Nursing (BSN)	36	72%	40%	70%	

The Commission found the CEM-San Juan did not report any employment rates or graduation rates that fall below ACCSC’s student achievement benchmark rates.³ However, in reviewing the backup documentation, the Commission found the following discrepancies:

- For the Nursing Sciences (AS) program, Commission was unable to verify the information from the Graduation and Employment Chart as the backup documentation listed a total of 205 students while the G&E Chart listed a total of 278 students; and
- For the Pharmacy Technician (AS) program, the May 2013 cohort on the Graduation and Employment Chart does not match the backup documentation.

The Commission noted this is the third consecutive response from the school with discrepancies in the backup documentation for the Graduation and Employment Charts and directs CEM-San Juan’s attention toward ensuring that the data provided in the school’s Graduation and Employment Charts are accurate and verifiable by supporting documentation.

Based on these discrepancies, the Commission is interested in obtaining further information for the 24-month Nursing Sciences (AS) program and the 24-month Pharmacy Technician (AS) program. Additionally, upon review of the supporting documentation provided by the school consisting of job titles and places of employment, the Commission noted graduates of the Nursing (BSN) program were placed with the same job title, Nurse Assess, with the same duties as those graduates of the Nursing Sciences (AS) program. The Commission questioned the significant additional expenditure of both time and money for the student to obtain a baccalaureate degree when the placement is equivalent to the lower academic associate degree. As such, the Commission is interested in obtaining further information for the Nursing (BSN) program.

Additionally, in reviewing the Graduation and Employment Charts included as part of the submission to the March 8, 2017 Commission letter, the Commission found 77 students, or 50%, listed as “Graduates-Further Education” in the Nursing Sciences (AS) program. Therefore, the Commission questioned if the primary educational objective of the Nursing Sciences (AS) degree is to prepare students for entrance or advancement in training related occupations, given the significant number of students reported as going on to further their education.

In addition, the March 8, 2017 Commission letter, directed CEM-San Juan to submit a Retention Chart for any program with a reported graduation rate below benchmark using a July 2017 Report Date. The response to the March 8, 2017 Commission letter states “[a] retention report using a July 2017 report date for the Emergency Medical Technician program is submitted as Exhibit 10,” however, no exhibit 10 was included as part of the response. As the 2017 Annual Report shows a graduation rate of 38%

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

for the 12-month Emergency Medical Technician program, the Commission remains interested in obtaining further information for this program.

Based on the foregoing, the Commission directs CEM-San Juan to submit the following:

- a. A detailed description of the factors impacting successful student achievement in the school’s programs; the strategies being implemented to overcome those factors; and an analysis and assessment of the effectiveness of the school’s efforts.
- b. A justification for the placement of baccalaureate degree graduates in the same position and job duties as the academic associate degree graduates and why a student should invest the additional significant expenditure of both time and money to obtain the higher-level baccalaureate degree when the placement is equivalent to the lower-level academic associate degree.
- c. A Program Viability Study for the Nursing Science (AS) program that specifically addresses the program’s efficacy in meeting the stated educational objectives and the needs of students and employers, as well as an analysis of the demand for graduates from the program’s area of study. Additionally, the study must include the review and commentary from the program area’s Program Advisory Committee (“PAC”) in which the PAC discusses and provides input with regard to:
 - i. The rate of employment of the program’s objectives and any factors or circumstances that may be affecting graduate employment;
 - ii. The adequacy of the programs objectives and training resources and whether the program is meeting program objectives; and
 - iii. The effectiveness of the programs in terms of producing competent and employable graduates.
- d. A Graduation and Employment Chart for the following programs using a **March 2018** Report Date:
 - 12-month Emergency Medical Technician (Diploma);
 - 24-month Nursing Sciences (AS);
 - 24-month Pharmacy Technician (AS); and
 - 36-month Nursing (BSN) programs.
- e. Supporting summary information for **each** Graduation and Employment Chart 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:

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

Graduate Name	Program	Start Date	Graduation Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ⁵ (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. 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. A Retention Report (available at the Commission’s website) for any program with a reported graduation rate below benchmark using a **March 2018** Report Date along with an analysis of retention trends over the last 12 months.
- 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.

Licensure Pass Rates

The March 8, 2017 Commission letter states, supplemental to the employment rates for each program, that the Commission reviewed the information provided in relation to the licensure requirements for the programs where CEM-San Juan provided a translation of the licensure requirements for each program as well as Program Advisory Committee (“PAC”) minutes showing a review of the licensure rates for each program. In reviewing the PAC October 19, 2016 meeting minutes the Commission noted the following:

Program	Number of Graduates	Number of Graduates Who Took Examination	Number of Graduates Who Passed Examination	Licensure Exam Pass Rate	Number of Graduates Who Did Not Take Examination	Provisional Licensure Period
Pharmacy Technician (AS)	30	26	20	77%	4	3 years
Emergency Medical Technician (Diploma)	22	4	3	75%	18	1 year
Nursing (BSN)	186	115	96	83%	71	1 year
Nursing Sciences (AS)	142	28	22	79%	114	1 year

⁵ Appendix VII (4)(a) Guidelines for Employment Classification requires the school to verify the employment classification.

Practical Nursing (Diploma)	52	26	20	77%	26	1 year
Respiratory Therapy (AS)	12	8	5	63%	4	1.5 years
Totals	444	207	166	N/A	237	N/A

In the March 8, 2017 Commission letter, the Commission found the CEM-San Juan discussed the licensure exam pass rate highlighted above that fell below ACCSC’s student achievement benchmark pass rate of 70%.⁶ In addition, the Commission found that although each program includes a licensure requirement, 53% of graduates, 237 of 444, were not taking the exam and only 37% of graduates, 166 of 444, were passing the exam. Additionally, the Commission noted that the number of graduates listed as Employed in Field on the July 2016 Graduation and Employment Charts far exceeded the number of graduates who passed the examination. While the Commission acknowledged each program may have a provisional licensure period, the Commission questioned how CEM-San Juan can consider the employment sustainable for those graduates who have not passed their examinations and achieved licensure. As such, the Commission determined that additional monitoring was warranted and directed CEM-San Juan to submit the licensure rates, by program, as reported in the 2017 Annual Report.

In response to the March 8, 2017 Commission letter, CEM-San Juan provided the following licensure rates, by program, as reported in the 2017 Annual Report:

Program	Number of Graduates	Number of Graduates Who Took Examination	Number of Graduates Who Passed Examination	Licensure Exam Pass Rate	Number of Graduates Who Did Not Take Examination
Nursing (BSN)	88	74	65	87%	14
Nursing Sciences (AS)	153	72	59	81%	81
Pharmacy Technician (AS)	34	23	16	70%	11
Respiratory Therapy (AS)	10	7	5	71%	3
Practical Nursing (Diploma)	42	18	13	72%	24
Emergency Medical Technician (Diploma)	13	7	5	71%	6
Totals	340	201	163	N/A	139

CEM-San Juan also indicated that the school provides services to assist graduates with licensure after graduation including monthly visits, transportation to examinations, disseminating upcoming exam dates, offering free board exam reviews, and developing “a program where 100% of the costs associated with applying of the Licensure Exam will be covered by the school.”

In taking into consideration the efforts of the school to increase the number of students who complete the licensure examination, along with the number of times per year licensure examinations are offered, and the provisional licensure period of up to multiple years, the Commission determined the tracking of graduates beyond the provisional licensure period to be burdensome. However, as the school is required to support student achievement rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*), the Commission determined that this documentation may include an attestation from the graduate and employer to demonstrate a graduate is utilizing their provisional

⁶ Section VII (B)(1)(b)(ii), *Substantive Standards, Standards of Accreditation and Appendix VII - Student Achievement Rates.*

license under a licensed professional in addition to the written documentation requirements of *Appendix VII – Guidelines for Employment Classification*.

As such, the Commission directs CEM-San Juan to submit the following information:

- a. For any graduate who gained employed in field in March 2018, provide the following information:

Student Name	Program	Start Date	Grad Date	Date of Initial Employment	Job Title

- b. For each student listed in (a.) above, provide a copy of the graduate’s license or an attestation from the graduate and employer to demonstrate the graduate is utilizing a provisional license under a licensed professional.
- 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 licensure requirements.

2. CEM-San Juan must demonstrate that faculty teaching technical and occupational related courses in either a non-degree or occupational associate degree programs must have a minimum of three years of related practical work experience in the subject area(s) taught and that faculty teaching technical and occupational related courses in either an academic associate or baccalaureate degree program have a minimum of four years of related practical work experience in the subject area(s) taught (*Section III (B)(5 & 7), Substantive Standards, Standards of Accreditation*). The March 8, 2017 Commission letter notes upon review of the supporting documentation for the Graduation and Employment Charts provided by the school consisting of job titles and places of employment, the Commission questioned the placements for the following graduates who were placed as faculty members at Centro de Estudios Multidisciplinarios:

Graduate Name	Program	Start Date	Grad Date	Employer Name	Date of Initial Employment	Job Title
██████████	Respiratory Therapy (AS)	1/8/2013	8/20/2015	Centro de Estudios Multidisciplinarios	September 2015	Faculty
██████████	Respiratory Therapy (AS)	5/1/2013	8/20/2013	Centro de Estudios Multidisciplinarios	September 2012	Faculty
██████████	Respiratory Therapy (AS)	5/1/2013	8/20/2013	Centro de Estudios Multidisciplinarios	June 2011	Faculty
██████████	Nursing (BSN)	5/2/2011	4/25/2014	Centro de Estudios Multidisciplinarios	September 2015	Faculty

Specifically, the Commission questioned how these graduates gained employment as faculty given their graduation dates and dates of initial employment. The Commission also questioned whether each faculty member possesses the appropriate three (3) or four (4) years of related practical work experience in the subject area taught and whether the faculty member passed the licensing board exam. As such, the Commission directed CEM-San Juan to submit documentation that each faculty member possesses the appropriate work experience and license.

In response to the March 8, 2017 Commission letter, CEM-San Juan provided the Employment Verification Form, Career Advancement Certification, and license for each of the graduates placed as faculty members at Centro de Estudios Multidisciplinarios but did not provide documentation to demonstrate each faculty member possesses the appropriate three (3) or four (4) years of related practical work experience in the subject area taught. Therefore, the Commission is interested in obtaining this

information to ensure these faculty members meet all requirements and directs CEM-San Juan to submit the following:

- a. Documentation to demonstrate [REDACTED] possesses the appropriate three (3) or four (4) years of related practical work experience in the subject area taught;
 - b. Alternately, if any of these faculty have been removed from the schedule, provide the qualifications for the instructor or instructors who are currently teaching the removed faculty's classes;
 - c. Any additional information the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards regarding the school's faculty qualifications.
3. CEM-San Juan must demonstrate that if an externship is part of the program completion requirements, students may not be considered as graduates or issued a graduation credential until the requirements of the externship have been satisfactorily completed (*Section II (A)(8)(f), Substantive Standards, Standards of Accreditation*). The March 8, 2017 Commission letter notes, in reviewing the factors and strategies developed by the school to increase student achievement rates, that CEM-San Juan listed one of the factors affecting the employment rate of the Pharmacy Technician program as requiring 1,000 hours of externship. The description listed by the school includes:

After graduating from the Pharmacy Technician program, students needs to complete 1,000 externship hours to be able to apply for the Licensure Exam; in accordance with the Pharmacy Board Law of Puerto Rico. Students graduate from our program with 630 externship hours. Students need to complete the remaining hours on their own.

The Commission acknowledged the strategy by CEM-San Juan to “extend the coverage of the required insurance coverage policy for externships until students complete the 1,000 externship hours required by the Pharmacy Board Law of Puerto Rico” and assigning “personnel to provide follow up and keep the students advised on current charges regarding the submission of documents in order to take and pass their licensure exam.” However, in the March 8, 2017 Commission letter, the Commission questioned why CEM-San Juan's Pharmacy Technician program includes only 630 externship hours when the Pharmacy Board Law of Puerto Rico requires 1,000 externship hours.

In response to the March 8, 2017 Commission letter, CEM-San Juan explained:

In 2006 CEM College revised the program requirements in relation to the externship activities in order to comply with the ACCSC Standards of Accreditation. The ACCSC standard requires review and approval by the Commission of any externship which is grater that one-third of the total length of the Program.

The Pharmacy Technician Program has an externship of 630 hours, representing 38% of the total length of the program. The externship total hours, over one-third of the total length of the program, were established taking into consideration the Pharmacy Law in Puerto Rico (Law #24). The Law requires a minimum of a thousand (1,000) externship hours, under the direct supervision of a licensed Pharmacist, to qualify for the state licensure test.

If we were to include the 1000 hours of externship experience into the program it would represent 61% of the total length of the program. In view of this fact the school's Program Coordinator keeps in contact with the graduates to make sure that they complete the 1,000 hours, even when they are out of

the school by that time. This strategy has allowed the school to comply with the ACCSC's standards of accreditation regarding the percentages allowed for externships hours while still helping our students to finish their 1000 hours required by law in order for them to be able to take their board exams and their permanent license. However, the school recognizes there is room for improvement and to make this process more effective.

Additionally, the school noted the Dean of Academic Affairs “is in the process of curricular revision to determine the academic structure of the program” and “considering the increase of the credits of the practice courses so that they can have the 1,000 hours, as required by law.”

While the *Standards of Accreditation* state “[s]chools are expected to maintain an appropriate balance among didactic, supervised laboratory, outside work/preparation, and externship activities as applicable within the program,” *Section II (A)(8)(e), Substantive Standards* also notes “[a]ny externship that is greater than one-third of the total length of the program requires **review and approval** [emphasis added] by the Commission.” Additionally, *Section I (B)(1)(e)(iii), Rules of Process and Procedure* states “[i]n cases where accrediting standards and federal or state government requirements differ, the most stringent will apply” and that “[i]f conflict exist between federal or state requirements and accrediting standards, the federal or state requirements will take precedence.” Based on the state law requiring Pharmacy Technician students to complete a minimum of 1,000 externship hours, the Commission directs CEM-San Juan to submit for review and approval the appropriate application to include an externship of 1,000 hours.

Warning Restrictions and Notification Requirement

Pursuant to *Section VII (K)(7), 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.

Pursuant to *Section VII (K)(7), Rules of Process and Procedure, Standards of Accreditation*, the CEM-San Juan must inform all 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 as set forth herein.

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.

CEM-San Juan 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.⁷ If the school's response contains documentation that includes

⁷ ACCSC has issued 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.

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.

CEM-San Juan 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 April 9, 2018**. If a response, the required fee,⁸ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before April 9, 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] or [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

Encl.: ACCSC Institutional Review Cover Sheet

⁸ ACCSC assesses a \$500 processing fee to a school placed on Warning.