



Accrediting Commission of Career Schools and Colleges

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January 16, 2018

**ELECTRONIC DELIVERY**

██████████  
Director  
D'Mart Institute  
The Gallery at Gran Caribe Carr. #2 Km 29.7  
Vega Alta, Puerto Rico 00962

**School #B072149**  
**Warning**

Dear ██████████

At the August 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to continue D’Mart Institute located in Vega Alta, Puerto Rico on Outcomes Reporting. Upon review of the September 8, 2016 Commission letter and the school’s response to that report, the Commission voted to place D’Mart Institute on **Warning** with a subsequent review scheduled for ACCSC’s August 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’s Review**

#### **November 2014**

At the November 2014 meeting, the Commission considered the Application for Renewal of Accreditation submitted by D’Mart Institute and voted to defer final action to afford the school an additional opportunity to demonstrate the continuity of management is ensured through reasonable retention of management staff, improve below-benchmark rates of student achievement in seven of the school’s programs, demonstrate that admissions documentation is secured prior to enrolling students, and to demonstrate that the school internally reviews and evaluates the performance of recruitment personnel.

#### **May 2015**

At the May 2015 meeting, the Commission considered its previous decision to defer final action on the Application for Renewal of Accreditation submitted by D’Mart Institute and voted to accredit the school for four years going forward from August 1, 2014, with a stipulation that the school demonstrate that the school does not advertise secondary educational objectives in a manner that would represent those courses as within the scope of the school’s ACCSC institutional scope of accreditation.<sup>1</sup> In addition, the Commission directed the school to submit three interim progress reports to demonstrate ongoing compliance with accrediting standards in the areas of: management retention, student achievement rates in seven of the school’s programs, and admissions documentation.

#### **December 2015**

At the December 2015 meeting, the Commission considered the Management Retention Report, Outcomes Report, and Admissions Report submitted by D’Mart Institute. Upon review of the June 1, 2015 Commission letter and the school’s response to the report, the Commission voted to continue D’Mart Institute on Management Retention Reporting and Outcomes Reporting and voted to accept the Admission Report. Specifically, the Commission noted the graduation rates for the Pharmacy Technician (Day and Evening), Practical Nursing (Day), and Emergency Medical Technician programs had graduation rates that

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<sup>1</sup> ACCSC notified the school in March 2016 that the stipulation was satisfied.

fell below benchmark. In addition, the Pharmacy Technician (Day) program's employment rate also fell below benchmark

### **August 2016**

At the August 2016 meeting, the Commission considered the previous decision to continue D'Mart Institute on Management Retention Reporting and Outcomes Reporting. Upon review of the March 25, 2016 Commission letter and the school's response to the report the Commission voted to remove the school from Management Reporting and continue the school on Outcomes Reporting in order to provide the school with an opportunity to demonstrate compliance in the area of employment classifications for the Practical Nursing – Diploma (Day) program.

### **August 2017**

At the August 2017 meeting, the Commission considered D'Mart Institute's extensive history of Reporting actions, including Outcomes Reporting. Despite several opportunities to demonstrate compliance in the area of Graduation and Employment rates, D'Mart Institute has yet to demonstrate compliance in this area. In a separate action, the Commission also considered its previous decision to defer final action on the Application for Renewal of Accreditation submitted by the main school, D'Mart Institute (M064778) located in Barranquitas, Puerto Rico ("D'Mart-Barranquitas") and voted to place issue a Warning Order due to the school's persistent inability to demonstrate compliance with accrediting standards. In accordance with accrediting standards regarding the responsibilities between main schools and their branches, the accredited status of a branch campus is dependent upon the continued accreditation of the main school (*Section VIII (B)(3), Substantive Standards, Standards of Accreditation*). As such, D'Mart Institute will remain under a Warning Order until the school has addressed the compliance issues outlined in this letter and the main school has addressed the compliance issues outlined in the January 16, 2018 Warning Order.

1. D'Mart Institute must demonstrate that the school has adequate management and administrative capacity in place that includes supervision by a team with the demonstrated ability to lead and manage a post-secondary educational institution, providing assurance that the school will operate in compliance with accrediting standards, meet its objectives, and fulfill its obligations to students (*Section I, Statement of Purpose, Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). The Commission took note that D'Mart Institute has been subject to reporting requirements on an ongoing basis since the Commission's first consideration of the most recent application for renewal of accreditation in November 2014. Although the Commission noted that some issues have been resolved, other issues have come into question. This is especially noteworthy, given that the Commission has determined that an evaluation of the main school's management is necessary as a result of the ongoing inability to demonstrate compliance with standards. The effectiveness of the D'Mart Institute management capacity and strategies will be evaluated in part by the school's ability to demonstrate compliance with accrediting standards.<sup>2</sup>

In order to afford D'Mart Institute another opportunity to demonstrate that the school has adequate management and administrative capacity, the Commission directs D'Mart Institute to submit the following:

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<sup>2</sup> In determining the adequacy of the school's management, the Commission will consider D'Mart Institute's entire response to the items outlined in this letter as evidence of the school's ability to demonstrate the capacity to manage a post-secondary institution and ongoing compliance with accrediting standards.

- a. A description of how the school is managed (including campus-based and corporate-based oversight) and how the oversight in place effectively ensures that the school meets its objectives, fulfills its obligations to students, and meets or exceeds accrediting standards on an ongoing basis. The explanation must include a description of the oversight relationship between the main school and its branches;
- b. Two organization charts as follows:
  - i. An organization chart representing the on-site management at the campus level (for each location) and
  - ii. An organization chart representing management at the corporate level, including the position and name of each individual;
- c. A list of all management and administrative staff (including corporate staff as applicable) who have been employed by the school since the last accreditation review in the following format, organized by position;

Position	Staff Member’s Name	FT / PT	Assumed Duties (month/year)	Date Employment Ceased (month/year)	Reason Employment Ceased	Number of Years Employed

- d. A copy of job descriptions for each manager and administrative staff member;
  - e. An explanation as to how each individual is qualified to fulfill his/her role with the school;
  - f. An explanation as to how there are a sufficient number of managers at the corporate and campus levels. In particular, the Commission is interested in how D’Mart Institute provides sufficient management and administrative capacity to oversee and maintain quality and consistency of operations; and
  - g. A description of professional development undertaken by the management team to deepen the understanding of the accrediting standards and documentation requirements.
2. D’Mart Institute must 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 the Outcomes Report the school reported the following student achievement rates using a **May 2017** Report Date on the Graduation and Employment Chart:

Program (Credential)	Length in Months	School Graduation Rate	ACCSC Benchmark Graduation Rate	School Employment Rate	ACCSC Benchmark Employment Rate
Practical Nursing (Diploma)	14	52%	47%	78%	70%
Pharmacy Technician (Diploma)	18	<b>41%</b>	51%	<b>29%</b>	70%

The Commission found that D’Mart Institute reported the employment rate highlighted above that falls below ACCSC’s student achievement benchmark rate.<sup>3</sup> D’Mart Institute also stated that the school

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

adopted changes based on the Program Advisory Committee’s feedback, including changing the curriculum and credits in some programs, acquisition of books in the library, and providing exam preparation assistance. The Commission noted, however, that the school has a history of low student achievement rates for the Pharmacy Technician program since November 2013 despite the school’s efforts at improving student achievement outcomes over an extensive period of time.<sup>4</sup>

Given the history of low student achievement rates in the Pharmacy Technician program, the Commission directs D’Mart Institute to submit the following:

- a. A Graduation and Employment Chart for the 18-month Pharmacy Technician program using a **July 2018 Report Date**;
- b. Summary information for the 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 field<sup>5</sup> (line #14), provide the following information:

Graduate Name	Program	Start Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification <sup>6</sup> (i.e., graduate or employer)

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

Graduate Name	Program	Start Date	Description of the Documentation on File

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

Graduate Name	Program	Start Date	Description of the Documentation on File

- 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

<sup>4</sup> Given the history of low student achievement in the Pharmacy Technician program, the Commission may direct the school to cap enrollment or cease enrollment or may suspend or revoke the program approval at its next review.

<sup>5</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

<sup>6</sup> Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

- c. If the school reports a graduation rate for the Pharmacy Technician program that does not meet the ACCSC benchmark, submit an ACCSC Retention Chart<sup>7</sup> to show more recent data with regard to retention;
- d. If the school reports an employment rate for the Pharmacy Technician program that does not meet the ACCSC benchmark, submit a list of graduates for the last six months and employment information, in the following format:

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

- e. 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.
3. D'Mart Institute must support student achievement rates through verifiable documentation (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). At issue is the school's failure to demonstrate that D'Mart Institute classifies students as "Unavailable for Graduation" in accordance with the instructions in the Graduation and Employment Chart. The category is limited to four conditions in which a student may be classified as Unavailable for Graduation: death, incarceration, active military service, and the onset of a medical condition that prevents continued enrollment. The classification of each student in the Unavailable for Graduation category must be supported by copies of official translated documentation.

In the September 8, 2016 letter, the Commission directed D'Mart Institute to submit documentation to support the classification of seven students as Unavailable for Graduation, due to questions raised by the description of the documentation on file at the school. Specifically, for students that were identified as unable to continue enrollment at the school due to medical conditions, it appeared that the school did not have written documentation from medical professionals to that effect. In addition, the school classified one student as Unavailable for Graduation due to legal reasons, which is not one of the allowable four conditions. In response, the school submitted attestations from the Student Affairs Officer that the student was unavailable for graduation, the reason why, and an assertion that the information had been verbally verified. In addition, the school provided documents for each student, which do not support the classification of Unavailable for Graduation, based on the Commission's definitional conditions, for the reasons described below:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

<sup>7</sup> Available for download at <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

In order to demonstrate successfully student achievement in the Practical Nursing program, D'Mart Institute submitted an updated Graduation and Employment Chart, prepared using a May 2017 Report Date. The school provided documentation for the nine students categorized as Unavailable for Graduation. Based on a review of that documentation, the Commission noted the following regarding the documentation provided:

- [REDACTED]

Overall, the Commission found that D'Mart Institute has failed to provide translated documentation that supports the classification of students as Unavailable for Graduation. Therefore, it is imperative that D'Mart Institute take this opportunity to show that students were appropriately categorized as "unavailable for graduation" in accordance with the Instructions for the Graduation and Employment Chart. If the school cannot provide documentation, the Commission will reclassify those graduates to be classified as "withdrawn" and recalculate student achievement rates and take action accordingly. For

example, if the nine students currently classified as Unavailable for Graduation for the Practical Nursing program are reclassified as withdrawn, the resulting graduation rate would be 39%, which falls well below the required benchmark of 50%.

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

- a. A copy of the school's official Policy and Procedures for classifying students as Unavailable for Graduation and for securing documentation to support those classifications;
- b. A Graduation and Employment Chart for the 14-month Practical Nursing program using a **May 2018 Report Date**;
- c. For any student classified as Unavailable for Graduation (line #6) on the Graduation and Employment Charts from (b.) above, provide the following information:

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

and

- d. Supporting and verifiable documentation for each student in the above chart to support the Unavailable for Graduation classification.
4. D'Mart Institute must provide evidence that PAC members for the Practical Nursing program provide meaningful review and comment of student achievement outcomes and that the school gives consideration to Program Advisory Committee input (*Section II (A)(6)(e), Substantive Standards, Standards of Accreditation*). As part of the Commission's August 2016 review of the student achievement rates in the Practical Nursing program, the Commission directed D'Mart Institute to provide documentation regarding the external feedback from the Program Advisory Committee. Based on a review of the November 21, 2016 and June 5, 2017 Program Advisory Committee ("PAC") meeting minutes, the Commission noted that while the PAC did comment on the importance of achieving adequate retention rates and the PAC specifically stated that programs with low retention and placement should be evaluated, the commentary was limited and does not appear to provide meaningful feedback or a discussion relative to initiatives to improve student achievement. In addition, the PAC meeting minutes note that members made recommendations in different areas; however, the meeting minutes do not clearly describe the specific recommendations and do not include evidence that the school considered any PAC input.

Based on the foregoing, the Commission directs D'Mart Institute to submit detailed PAC minutes for two PAC meetings held since August 1, 2017 for the Practical Nursing program that include the following:

- a. A description of each member in attendance (i.e., titles and affiliations) and a notation as to which members in attendance represent the employment community or are practitioners;
- b. The date, time, and location of each meeting;
- c. A comprehensive and clear description of the review of and commentary made by the PAC members;
- d. Evidence the PAC review includes review and commentary graduation and employment required by standards; and

- e. Evidence that the school gives consideration to PAC input.

**Application for a New Non-Degree Program:**

At the August 2017 meeting, the Commission considered its previous decision to defer action on the Application for a New Non-Degree Program for the Geriatrics Assistant (Diploma) program. The Commission voted to defer again final action on the Application for a New Non-Degree program for the Geriatrics Assistant (Diploma) program in conjunction with the decision to place the school on Warning. The Application for a New Non-Degree Program for the Geriatrics Assistant (Diploma) program will again be considered at the August 2018 meeting.

**Warning Restrictions:**

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.

**Notification to Students:**

The Commission requires the school 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 (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

**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.

D'Mart Institute 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>8</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.

D'Mart Institute 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

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<sup>8</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).

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.

A \$500 processing fee is assessed when a school is placed on Warning. Accordingly, the school will receive an invoice, under separate cover, in the amount of \$500. 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 29, 2018.**

If a response, the required fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 29, 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