



Accrediting Commission of Career Schools and Colleges

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June 10, 2020

ELECTRONIC DELIVERY

[Redacted]

Takoda Institute of Higher Education
1845 East Franklin Avenue
Minneapolis, Minnesota 55404

School #M072435

Dear [Redacted]

At the May 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the response to the Commission’s December 5, 2019 Probation letter submitted by Takoda Institute of Higher Education (“TIHE”) located in Minneapolis, Minnesota. Upon review of the December 5, 2019 Commission letter and the school’s response to that letter, the Commission voted to continue TIHE on **Probation** with a subsequent review scheduled for ACCSC’s **November 2020** meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

STUDENT ACHIEVEMENT

TIHE must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education (*Section VII (B)(1)(b), Appendix VI, Substantive Standards, Standards of Accreditation*). TIHE must also be able to support these rates through the school’s verifiable records of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*).

November 2019 Review

In response to the June 26, 2019 Warning letter, TIHE provided graduation and employment rates with a July 2019 report date as highlighted in the chart on the next page along with additional information regarding TIHE’s efforts to address the school’s student achievement problem. The Commission noted that as of the July 2019 Report Date on the Graduation and Employment Chart, none of the school’s programs was meeting the student achievement benchmarks.

TIHE sought assistance from the school’s Program Advisory Committees and received recommendations regarding the expansion of the Student Services Department to provide additional support for students, strengthening admissions procedures to ensure prospective students understand program requirements, and changing the structure of pre-requisites. In addition, TIHE provided occupational outlook information for the Patient Service Specialist (Certificate) and Computer Support Specialist (Certificate) programs in an effort to show program viability. While the Commission acknowledged the initiatives being considered and implemented by TIHE, the Commission remained concerned that the history of TIHE’s student achievement rates showed a trend of below-benchmark graduation rates with no evidence of improvement. Accordingly, the Commission placed TIHE on Probation with a subsequent review scheduled for the May 2020 meeting.

May 2020 Review and Action

At the May 2020 meeting, the Commission considered the history of TIHE’s below-benchmark student graduation and employment rates from May 2014 to present as recorded in the chart below:

Program	Length in Month	G/E	May 2014 Report Date	July 2016 Report Date	Feb. 2017 Report Date	March 2018 Report Date	Feb. 2019 Report Date	July 2019 Report Date	Jan. 2020 Report Date	ACCSC Benchmark Rates
Administrative Professional*	9/6	G	41%	40%	57%	0%	17%	0%	0%	55%/60%/73%
		E	86%	25%	75%	No rate	0%	0%	0%	66%/70%
Computer Support Specialist	9	G		52%	47%	57%	40%	38%	37%	60%
		E		70%	75%	29%	67%	55%	43%	70%
Patient Services Specialist†	6	G	72%	71%	65%	92%	30%	45%	57%	69%/73%
		E	62%	57%	55%	55%	33%	50%	50%	66%/70%

* Originally, this was the 9-month Administrative Assistant program. The program became 6 months in length effective with the March 2018 Report Date.

† Formerly the Health Information & Patient Services Specialist program

As shown in the chart above, the graduation and employment rates for the Administrative Professional,¹ Computer Support Specialist, and Patient Services Specialist Certificate programs all continue to fall below the Commission’s benchmarks. Although the graduation rate for the Patient Services Specialist program improved by 12 percentage points, the Computer Support Specialist program’s graduation and employment rates have further declined by one percentage point and 12 percentage points respectively with the most recent report date of January 2020.

In its response, TIHE identified six underutilized assets that the school could use to improve outcomes:

- Better motivation of staff and faculty;
- Enrollment size;
- The TIHE cohort model;
- The effective use of established cultural competencies reflected by the school’s base constituencies;
- More effective engagement with existing programming housed within the American Indian OIC; and
- More effective leveraging of the wide array of external partners as facilitated by the American Indian OIC.

¹ TIHE has not enrolled students in the Administrative Professional program since January 2018 and stopped marketing the program in June 2018.

In addition, the school described a new five-step process for supporting students, including:

- Enhanced enrollment and orientation processes;
- Retention, achievement, and completion processes;
- Completion transitions;
- Post-graduate engagement and mentoring activities; and
- Ongoing institutional learning activities.

TIHE also identified several positive developments from the new Tiospaye Initiative following its implementation in fall 2019, including increased engagement, and the school provided preliminary data showing increased retention of students.

While the Commission acknowledged the initiatives being considered and implemented by TIHE, and took note of the positive trend in retention rates, the Commission remains concerned that the history of TIHE's student achievement rates shows a long-term trend of below-benchmark graduation rates. The Commission considered TIHE's explanations and strategies for supporting and enhancing student graduation and employment for the school's programs. Although TIHE has outlined a comprehensive approach to address student needs, the school has been unable thus far to demonstrate successful student achievement across the school's programs and to bring the school's graduation and employment rates to a minimally acceptable level as required by accrediting standards.

The school's student achievement trends notwithstanding, the Commission determined that it is appropriate to provide the school with an additional opportunity to demonstrate the positive impact of the school's strategies on the reported rate of student achievement. However, the Commission reminds TIHE that if the school cannot demonstrate successful student achievement including graduation and employment rates that meet or exceed the Commission's established benchmarks, then the Commission will take appropriate action as afforded under *Section VII, Rules of Process and Procedure, Standards of Accreditation* to include withdrawing program approval or the school's accreditation. Based on the longstanding nature of its student achievement struggles, TIHE must seriously consider whether the school can offer its programs in a manner that will translate to successful student achievement for the student population served by the school.

Therefore, in order to afford TIHE with an opportunity to further develop its student achievement support strategies in the Computer Support Specialist program and the Patient Services Specialist program and to document the effectiveness of these strategies on the reported rates of student achievement, the Commission determined that further monitoring is warranted. Accordingly, the Commission directs the school to submit the following:

- a. The school's student achievement improvement plans for the Computer Support Specialist (Certificate) and Patient Services Specialist (Certificate) programs specifically addressing any modifications or improvements implemented in the following areas:
 - i. Admissions requirements and process;
 - ii. Curriculum modifications;
 - iii. Student Services; and

- iv. Career services and employer engagement.
- b. Updated program viability studies for the Computer Support Specialist program and the Patient Services Specialist program to include the school’s detailed analysis as to the viability of each program and evidence to support program viability. The school should evaluate current retention trends and employment trends and assess when the programs’ student achievement rates are expected to meet ACCSC’s benchmark rates.
- c. Written and detailed minutes of all PAC meetings held for all programs in 2020 that include:
 - i. A description of all members in attendance (i.e., titles and affiliations);
 - ii. The date, time, and location of the meeting;
 - iii. A comprehensive and clear description of the review and commentary made by the school representatives and the Program Advisory Committee members in compliance with *Section II (A)(6)(e), Substantive Standards, Standards of Accreditation* (the school is reminded that PAC review and comment activities must include all items outlined in *Section II (A)(6)(d), Substantive Standards, Standards of Accreditation*); and
 - iv. Evidence to demonstrate that the PAC has reviewed the school’s new student achievement support strategies along with documentation of the PAC members’ assessment as to the effectiveness of those strategies.
- d. Graduation and Employment Charts for the Computer Support Specialist (Certificate) and Patient Services Specialist (Certificate) programs using a **July 2020 Report Date**.
- e. 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 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 classified as employed in the field² (line #14), provide the following information:

Graduate ID	Program	Start Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification ³ (i.e., graduate or employer)

² See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

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

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

- d. 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.

In responding to this letter of Probation, TIHE must demonstrate to the Commission a likelihood that the new strategies implemented by the school will lead to acceptable graduation and employment rates. Additionally, TIHE must demonstrate as part of its response that the school has fully addressed the root causes (internal and external) surrounding the inability to demonstrate successful student achievement as measured via graduation rates and provide evidence of successful student achievement. Pursuant to *Section VII (R), Rules of Process and Procedures, Standards of Accreditation*, if the school fails to demonstrate successful student achievement, the Commission is likely to take a programmatic action to require the school to cease enrollment in a program or to suspend or revoke the approval of a program if that program fails to demonstrate acceptable rates of student achievement. The Commission may also take further institutional action to include continuing the school on probation or a withdrawal of accreditation action.

ADMINISTRATIVE PROFESSIONAL AND DIGITAL OFFICE PROFESSIONAL PROGRAMS:

The Commission noted that the Administrative Professional and Digital Office Professional programs are in teach-out status and directs TIHE’s continued attention toward ensuring that the school continues to support student success through the offering of student, academic, and career services to students enrolled in these programs through the programmatic teach-out process.

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. Failure of the school to demonstrate that accrediting requirements have been met by the due date as set forth herein may result in a revocation of program approval or withdrawal 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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of

accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with *Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation*, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school's federal financial aid responsibilities.

In accordance with *Section VII (L)(8), Rules of Process and Procedure, Standards of Accreditation*, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission's website.

MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

As stated in *Section VII (M), Rules of Process and Procedures, Standards of Accreditation*, where the Commission has found an area in which a school is out of compliance with accreditation standards or requirements, the period allotted to the school to remedy the noncompliance or cure the deficiency, together with the time for the Commission's final decision, will not exceed eighteen months if the school's longest program is at least one year, but less than two years in length;. Accordingly, the maximum eighteen month timeframe for TIHE to achieve compliance began as of the December 5, 2019 Probation letter. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe if the school's response demonstrates an increasingly deteriorating financial position and lack of financial soundness.

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.

TIHE 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.⁴ 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.

TIHE 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

⁴ 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.

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 September 24, 2020**. If a response, the required fee⁵, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before September 24, 2020**, 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,

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

⁵ ACCSC assesses a \$1,000 processing fee to schools placed on Probation.