

March 30, 2020

ELECTRONIC DELIVERY

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 ████████████████████
 Harris School of Business
 401 Whitehorse Rd.
 Voorhees, New Jersey 08043

School #M001524

██████████:

At the February 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place the entire system of schools owned and operated by Premiere Education Group (“PEG”), including Harris School of Business located Voorhees, New Jersey (HSB-Voorhees) on **Warning**. This letter serves to inform HSB-Voorhees that while the Commission voted to vacate the system-wide Warning action,¹ based on a review of HSB-Voorhees’ response to the Commission’s September 20, 2019 letter, and in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards, the Commission voted to continue HSB-Voorhees on Warning with a subsequent review scheduled for ACCSC’s **August 2020** meeting. The reasons for the Commission’s decision and the Commission’s requirements for HSB-Voorhees to demonstrate compliance are set forth below.

1. HSB-Voorhees must submit a report on its continued efforts to 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), Substantive Standards, Standards of Accreditation*). Additionally, HSB-Voorhees must demonstrate that the school verifies initial employment of its graduates in accordance with accrediting standards (*Section VI (C)(2); Substantive Standards of Accreditation; Standards of Accreditation*). In response to the September 20, 2019 Warning letter, HSB-Voorhees provided the following student achievement rates using a November 2019 Report Date on the Graduation and Employment Charts for the 6-month and 11-month Multi-Skill Health Technician, 9-month Dental Assistant, and 11-month Health Claims Specialist programs. The Commission considered that data along with the student achievement data previously reported to ACCSC as follows:

Program (Length in Months)	Grad/Emp	7/18 RD	6/19 RD	11/19 RD	ACCSC Benchmark Rates
Multi-Skills Health Technician (11 Months)	G	48%	42%	48%	55%
	E	50%	45%	57%	70%
Multi-Skill Health Technician (6 Months)	G	73%	59%	63%	73%
	E	67%	67%	69%	70%
Dental Assistant (9 Months)	G	58%	*	100%	60%
	E	86%	*	100%	70%
Health Claims Specialist (11 Months)	G	60%	*	*	55%
	E	67%	*	*	70%

RD=Report Date *Zero Starts

¹ Please note that the Commission will send a letter under separate cover to PEG regarding the system-wide areas under Commission consideration, the reasons for the system-wide action, and requirements to respond to the system-wide action.

As shown in the chart above, the Commission noted that while the graduation and employment rates for the 11-month and 6-month Multi-Skills Health Technician improved from the June 2019 Report Date, those rates continue to fall below the established student achievement benchmark. Additionally, as part of the school's response, HSB-Voorhees explained that:

- While the Dental Assistant program shows both a graduation and employment rate of 100%, this is based on a cohort of one student;
- There was a substantive change to the Health Claims Specialist program reducing length of the program from 11 months to 7 months, including a reduction of the program clock hours from 1110 hours to 900 hours; and
- The school has continued with its voluntary decision to cease enrollment in the 15-month Multi-Skills Health program.

In its response, HSB-Voorhees outlined a number of challenges and obstacles outside of the classroom faced by its student population that the school believes adversely impacted student graduation rates and described several initiatives being implemented to assist students. These areas include resources within the community to help with child care, housing, food donations, and health resources. Additionally, the school explained that it is hosting more student events, tutoring sessions and review classes for students struggling academically as well as helping students to find part-time jobs while in school to help with financial difficulties. To support graduate placement, HSB-Voorhees outlined several new initiatives, including bringing in guest speakers to talk to the students regarding real world experiences, offering review seminars for certification exams to make graduates more marketable in their field of study, and increasing outreach to motivate and encourage graduates during their employment search. HSB-Voorhees also explained the school's process and procedure for recording and verifying graduate employment describing how the school determines in-field employment outcomes and provided copies of completed employment verification forms.

With regard to the school's employment verification efforts, the Commission found that while the school provided supporting documentation as directed in the September 20, 2019 letter, the school's Self-Employment Attestation form does not include a line for the graduate to attest that the self-employment is aligned with the individual's employment goals, is vocational, and is based on and related to the education and training received; that the graduate is earning training-related income; and in cases where licensure is required for employment, that such licensure has been achieved. These elements are required by [ACCSC's Guidelines for Employment Classification](#).

Overall, the Commission took into consideration the school's efforts and improvement. However, the Commission remains interested in monitoring the ongoing impact of those efforts and whether the school's rates of student achievement can reach ACCSC's benchmarks. Based on the foregoing, the Commission directs the school to submit the following:

- a. A Graduation and Employment Chart for the 11-month and 6-month Multi-Skills Health Technician, 9-month Dental Assistant, and revised 7-month Health Claims Specialist programs using a **June 2020 Report Date**.
- b. For **each** Graduation and Employment Chart, provide:

i. The following information for every student categorized as a “start” on line 2:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1					

ii. For each student classified as “Unavailable for Graduation” (line #6), the following information:

Count	Student ID	Program	Start Date	Reason Unavailable	Description of the Documentation on File
1					

iii. Supporting and verifiable documentation for each student in (ii.) above to include minimally, external documentation such as military orders, letter from physician/doctor, death notice/obituary, public record of incarceration.

iv. For each graduate classified as employed in the field² (line #14), the following information:

Count	Graduate ID	Program	Start Date	Employer, Contact, Address, & Ph. #	Date of Initial Employment	Descriptive Job Title & Responsibilities	Source of Verification ³ (i.e., graduate or employer)
1							

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

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

vii. Supporting and verifiable written documentation for each graduate in (vi.) above to include a signed statement from the graduate with the graduate’s name and contact information; an attestation that the self-employment is aligned with the individual’s employment goals, is vocational, is based on and related to the education and training received; an attestation that the graduate is earning training-related income; and in cases where licensure is required for employment, an attestation that such licensure has been achieved.

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

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

ix. Supporting and verifiable documentation for each graduate in (viii.) above to include written documentation from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.

x. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), the following information:

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.

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason
1					

- xi. Supporting and verifiable documentation for any graduate classified in (x) to include, minimally, external documentation such as transcripts/enrollment agreements for “Graduates-Further Education” and military orders, letter from physician/doctor, death notice/obituary, public record of incarceration, etc. for “Graduates-Unavailable for Employment.”
 - c. If either the reported graduation rate or employment rate for the 11-month and 6-month Multi-Skills Health Technician, 9-month Dental Assistant, or 7-month Health Claims Specialist programs fall below student achievement benchmark, provide a copy of the school’s student achievement improvement plan which addresses 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.
 - d. Minutes from at least one Program Advisory Committee (“PAC”) meeting for each program area hosted in 2020 that include the date, time, and location of each meeting; a comprehensive and clear description of the review of and commentary made by each of the school’s PAC; the review and commentary regarding student achievement outcomes, learning resources, the adequacy of facilities and equipment⁴; and the school’s consideration of PAC input.
 - e. A copy of the school’s process and procedures for classifying and verifying graduate employment.
 - f. A copy of the current verification forms, including a revised Self-Employment Attestation form, that the school currently utilizes to verify self-employment as part of the process and procedures described in (e.) above.
 - 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.
2. Harris School of Business must demonstrate that the school remains attentive to students’ educational and other needs (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). In response to the September 20, 2019 Warning letter, HSB-Voorhees explained that to address student satisfaction, the school implemented career services seminars for all students and attached an analysis of survey results from 134 of 185 active students. The school indicated that that campus expectation for student satisfaction would be a minimum of a global index grade of 4.0 and that student satisfaction regarding their instructors is 4.49 and satisfaction regarding the school is at 4.21. HSB-Voorhees also indicated that survey results also show that 73.4% of students would recommend to a friend and that that 81% feel they made a good decision enrolling in school. The Commission noted, however, that the schools survey results again do not include any information regarding student satisfaction with the school’s learning resource system, which was a key area of the original compliance finding included in the Team Summary Report. The school also did not provide an analysis of the student survey results with a

⁴ See Item #2 of this Continued Warning letter.

particular focus on overall student satisfaction, given that survey results that show less than 80% satisfaction in this area.

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

- a. Summary results of a student survey of not less than 50% of the student population enrolled at HSB-Voorhees using the attached **ACCSC student survey** along with the following:
 - i. A description of the student survey process;
 - ii. A detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction; and
 - iii. A detailed narrative of the school's plan to address any areas of student satisfaction, if applicable, and any other information to support the efforts made to enhance a student's experience at the school; and
 - b. Any other information or documentation that HSB-Voorhees believes will assist the Commission with determining the school's compliance with accrediting standards in this regard.
3. HSB-Voorhees must demonstrate that the school engages in ongoing institutional assessment and improvement activities that support the management and administration of the school as well as the quality of education provided (*Section I (B)(1), Substantive Standards, Standards of Accreditation*). According to the school's response, the campus Institutional Assessment and Improvement Plan (IAIP) is developed for the calendar year and that given the timing of the response to the Warning letter, the school was unable to analyze the plan as a whole since it is still in need of data for the month of December. The school further posited that the full analysis and development of the 2020 IAIP will be conducted between late December 2019 and early January of 2020.

Based on the foregoing, the Commission directs the school to submit a description of the school's institutional assessment and planning activities that includes the following:

- a. Evidence of institutional assessment and improvement activities and planning appropriate to the size and scale of the school's operations and that support the management and administration of the school as well as the quality of education provided;⁵
 - b. Documentation showing the implementation activities that took place from December 1, 2019 through May 31, 2020 in any of the areas described in *Section I (B)(1), Substantive Standards, Standards of Accreditation*; and
 - c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards in this regard.
4. HSB-Voorhees must demonstrate that prior to enrollment the school determines that an applicant meets the school's admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*). According to the school's response to the September 20, 2019 Warning letter, prospective students are given a conditional/provisional acceptance based on their acknowledgment that they possess a high school diploma or equivalent which is requirement for acceptance, indicating

⁵ Areas to consider should include management; fiscal condition and budget; administrative policies and practices; emergency preparedness; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes.

that all students must have a valid proof of graduation in their file prior to the campus director signing and fully executing the enrollment agreement. Further, HSB-Voorhees posits that no student is permitted to start school without a copy of the proof of graduation in their student file.

However, based on a review of the school’s submission of a roster of students who started school between September 1, 2019 and November 30, 2019, two students in the Dental Assistant program, Student [REDACTED] had their enrollment agreement signed and accepted by the school after the program start date, and for three students in the Multi Skilled Health Technician program, Students [REDACTED], the school includes two dates on the roster identifying when all admissions documentation was secured, one of which falling after the program start date.

Based on the foregoing, the Commission determined that additional monitoring is warranted and directs the school the submit the following:

- a. A description of the school’s internal process and procedures for enrolling and executing enrollment agreements including a description as to how school secures admission documentation and determines that students meet the school’s admissions requirements, prior to enrollment and starting class;
- b. A roster of all students that started classes from January 1, 2020 through March 15, 2020 as follows:

Student ID #	Program Name	Date All Admissions Documentation Secured	Date Enrollment Agreement Signed & Accepted by School	Program Start Date

- c. An explanation for any student for whom the school did not receive all admissions documentation, prior to the enrollment agreement being signed by the school or prior to the start of class, from item (b.) above; and
- d. Any additional documentation to demonstrate that the school’s policies and procedures are in compliance with the accrediting standards cited above.

Warning Restrictions:

Pursuant to *Section VII (K)(9), 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.

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.

HSB-Voorhees 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.⁶ 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.

HSB-Voorhees 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 July 2, 2020**. If a response, the required fee,⁷ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before July 2, 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

Encl. ACCSC Student Survey

⁶ 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.

⁷ ACCSC assesses a \$500 processing fee to a school placed or continued on Warning.

Current Program: _____ **Start Date:** _____
(month/year you started training)

Please check the box that best reflects your opinion and experience at this school.

ADMISSIONS	Strongly Agree	Agree	Disagree	Strongly Disagree
1. A school representative accurately provided me with all of the necessary facts and details about the school before I enrolled.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. All tuition costs and student charges (such as books, fees, tools, etc.) were explained to me.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. I was able to make an informed decision to enroll based on the information provided to me during the admissions process.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4. My decision to enroll was solely my own and made without pressure from the school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Did you receive a copy of the school catalog (a hard copy or electronic document that describes the school, its programs, policies and procedures) before you enrolled?	Yes:	<input type="checkbox"/>	No:	<input type="checkbox"/>
6. Did you receive a copy of the enrollment agreement that was signed by you and a school official?	Yes:	<input type="checkbox"/>	No:	<input type="checkbox"/>
FINANCIAL AID	Strongly Agree	Agree	Disagree	Strongly Disagree
7. The financial aid representative provided me with accurate information that helped me make an informed decision regarding the affordability of school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. I was able to make an informed decision about the affordability of school without persuasion from the financial aid representative.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. (If you have a student loan): The school explained the amount of my loan.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. (If you have student loan): The school explained my loan repayment responsibilities (e.g. frequency of payment and amount per payment).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ACADEMIC PROGRESS	Strongly Agree	Agree	Disagree	Strongly Disagree
11. The school's grading policy is explained clearly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. The school's grading policy is applied fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. The school's attendance policy is explained clearly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14. The school follows its published attendance policy.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. The school reports my academic progress (grades and attendance) to me at regular intervals.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
STUDENT SERVICES	Strongly Agree	Agree	Disagree	Strongly Disagree
16. The school made me aware of services (academic advising and tutoring) that are available to assist me when I have questions about my educational training.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. The school made me aware of services that can assist me if I have issues that affect my ability to attend school and complete the program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. The school made me aware of services that it provides to help me get a job after I graduate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. The school follows its published procedure for handling student concerns/complaints.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FACULTY	Strongly Agree	Agree	Disagree	Strongly Disagree
20. Instructors are interested in my individual progress throughout the program.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Instructors seem knowledgeable about subject areas they are teaching.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. Instructors appear to be trained to teach.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
23. Instructors answer questions in an understandable way.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Instructors have a positive attitude and treat all students fairly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. Instructors make class interesting.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PLEASE COMPLETE BOTH SIDES OF THIS SURVEY

LIBRARY/LEARNING RESOURCE SYSTEM (LRS)	Strongly Agree	Agree	Disagree	Strongly Disagree
26. The school provided an adequate orientation on how to use the library/LRS.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. The library/LRS is staffed and someone is available to help me when I have questions.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. The library/LRS is useful for completing required assignments.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
29. The library/LRS materials are available during and beyond classroom hours.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
FACILITY	Strongly Agree	Agree	Disagree	Strongly Disagree
30. The physical facilities (overall building) are adequately maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31. The classrooms are adequately maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. The laboratories are adequately maintained.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
TRAINING EQUIPMENT	Strongly Agree	Agree	Disagree	Strongly Disagree
33. There is sufficient time for hands-on training and practicing on the equipment.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
34. The training equipment is sufficient in quantity.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
35. The training equipment is sufficiently up-to-date and kept in good repair.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
OVERALL EDUCATIONAL EXPERIENCE	Strongly Agree	Agree	Disagree	Strongly Disagree
36. I feel good about my decision to attend this school.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
37. I would recommend this school to a friend (assuming my friend was interested in this type of training).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

38. What do you expect to do when you complete your training program? (You may choose more than one answer)

- Go to work in an occupation for which my training has prepared me.
- Continue my education in this same occupational area.
- Seek employment in an occupation not related to this training program.
- Continue my education in an occupational area different from this training program.

Other:

COMMENTS (OPTIONAL)

Please use this space to elaborate on any of your answers to the survey questions, include suggestions to improve the school, or provide any additional comments/concerns about your overall experience at the institution.

Thank you for completing this survey. Your comments will be very helpful.