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June 7, 2023

ELECTRONIC DELIVERY

Interim Campus Director of Operations and Educ. Porter and Chester Institute 33 Palomba Drive Enfield, Connecticut 06082

School #B001083 Warning

Dear

At the May 2023 meeting, the Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") considered the Student Satisfaction Report submitted by Porter and Chester Institute ("PCI-Enfield") located in Enfield, Connecticut. Upon review of the December 8, 2022 ACCSC letter and the school's response, the Commission voted to place PCI-Enfield on **Warning** with a subsequent review scheduled for ACCSC's September 2023 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 Commissions Review

- At the February 2020 meeting, the Commission placed the school on Student Satisfaction Reporting for not providing new student survey results collected after the on-site evaluation to show whether the school's efforts helped ameliorate student concerns.
- At the November 2020 meeting, the Commission continued PCI-Enfield on Student Satisfaction Reporting. The Commission noted that only 33.8% of the student body completed the survey. Additionally, the student survey results showed less than 80% student satisfaction in areas including Student Services, Faculty, Library and Learning Resource System, and Training Equipment. Accordingly, the Commission determined that additional monitoring of student satisfaction was warranted and directed PCI-Enfield to resurvey a sample of not less than 50% of the student population.
- At the June 2021 meeting, the Commission continued PCI-Enfield on Student Satisfaction Reporting. Despite the school's efforts to increase the response rate for their student survey, the Commission noted that there were several areas such as Student Services, Faculty, Library and Learning Resource System, and Training Equipment that continue to show less than 80% student satisfaction.
- At the February 2022 meeting, the Commission continued PCI-Enfield on Student Satisfaction Reporting. The Commission noted that there were several areas that continued to show less than 80% student satisfaction including: Admissions (Overall Rating: 75.1%), Academic Progress (Overall Rating: 76.38%), Faculty (Overall Rating: 62.45%), and Facilities (Overall Rating: 67.47%). The Commission was especially concerned with the areas of Student Services (Overall Rating: 50%), Library and Learning Resources System (Overall Rating: 50.3%), Training Equipment (Overall Rating: 49.4%), and Overall Experience (39.15%) that showed exceptionally high levels of student dissatisfaction.
- At the August 2022 meeting, the Commission noted several areas that continued to show less than 80% student satisfaction including: Admissions (Overall Rating: 62.5%), Financial Aid (Overall Rating: 66.2%), Academic Progress (Overall Rating: 66.6%), Faculty (Overall Rating: 71.9%), and Facilities (Overall Rating: 67.47%). The Commission remained especially concerned with the areas of Student Services (Overall Rating: 42.8%), Library and Learning Resources System (Overall Rating: 43.8%), Training Equipment (Overall Rating: 50.8%), and Overall Experience (30.8%) that continued to show

exceptionally high levels of student dissatisfaction. The Commission voted to continue PCI-Enfield on Student Satisfaction reporting and stated in the December 8, 2023 letter that, "continued high levels of student dissatisfaction in which the Commission has reason to believe that a school is not in compliance with one or more accreditation standards or other requirements **may result in a stronger action such as placing the school on Warning or Probation**" [emphasis added].

May 2023 Commission Review and Action

PCI-Enfield must submit a report on the school's efforts to be attentive to students' educational and other needs (*Section VI (A)(1)*, *Substantive Standards, Standards of Accreditation*). In response to the Commission's December 8, 2022 letter, PCI-Enfield stated that the school surveyed 101 students; however, only 51 (51%) of the student population responded to the February 6, 2023 Student Satisfaction Survey. The school reported the following overall student satisfaction rates: Admissions (Overall-Rating 59.5%); Financial Aid (Overall-Rating 60.3%); Academic Progress (Overall-Rating 64.2%); Student Services (Overall-Rating 41.1%); Faculty (Overall-Rating 62.45%); Library / Learning Resource System (Overall-Rating 44.1%); Facility (Overall-Rating 52.3%); training Equipment (Overall-Rating 45.1%); and Overall Experience (Overall-Rating 15.9%). The Commission found that the above reported student satisfaction rates have continued to decrease significantly since originally placed on reporting as outlined in the table below.

Review Date	Admissions Overall Rating	Academic Progress Overall Rating	Financial Aid Overall Rating	Student Services Overall Rating	Faculty Overall Rating	LRS Overall Rating	Facility Overall Rating	Training Equipment Overall Rating
Feb 2020	95%	67%	90%	42%	70%	47%	40%	42%
Nov 2020	86.6%	80.8%	85.4%	66.7%	70.8%	69.8%	80.6%	59.7%
Jul 2021	86.6%	78%	84.8%	55.7%	65.5%	71.7%	79.7%	62.2%
Feb 2022	75.1%	76.4%	80.7%	50%	62.5%	50.3%	67.5%	49.4%
Aug 2022	62.5%	76.4%	66.2%	42.8%	71.9%	43.8%	64.9%	50.8%
May 2023	59.5%	64.2%	60.3%	41.1%	62.5%	44.1%	52.3%	45.1%

In addition, as part of the Student Satisfaction Report, and to determine if there was a correlation between the high levels of student dissatisfaction and the low levels of student graduation, the Commission directed PCI-Enfield to submit Graduation and Employment Charts for the Practical Nursing (Diploma) program using a **January 2023** Report Date. PCI-Enfield reported the following student achievement rates:

Program (Credential)	Length in Months	School Graduation Rate	ACCSC Benchmark Graduation Rate	School Employment Rate	ACCSC Benchmark Employment Rate
Practical Nursing (Diploma)	15	19%	50%	70%	70%
Practical Nursing (Diploma)	21	0%	55%	No Data	7070

PCI-Enfield described, in part, the reasons impacting student dissatisfaction as follows:

Continued delay to graduation is the primary dissatisfaction noted when contrasting survey results. As students continue to experience delays to both clinical placement and graduation, student

satisfaction will continue to drop. Student frustration and anger over clinical backlog and delayed graduation has resulted in poor ratings across all aspects of the practical nursing program and is more reflective of the frustration and lack of control students feel, as opposed to the program quality. Ongoing recruitment issues and insufficient numbers of qualified faculty due to increased nursing demand only adds to the delay in clinical placement and graduation. Lastly, the apparent learning gaps created by the frontloading of didactic courses and delayed clinical experiences contribute to feelings of frustration and decreased student satisfaction. Students who are struggling academically and require additional support, tutoring, and remediation, are resentful of the extensive delays and are fearful that they will not be prepared upon graduation (February 23, 2023 PCI-Enfield Response. p. 22).

Additionally, as part of the school's response, PCI-Enfield included an analysis and assessment of the Student Satisfaction Survey results and a plan of action to improve student satisfaction as outlined below:

- Admissions: PCI-Enfield stated that since the school ceased enrollment in October 2021, the same student population that was surveyed in the last survey participated in the February 2023 survey. Furthermore, the school finds it "difficult to assess why the admissions rating has dropped in some areas and improved in others when none of the students have participated in the admissions process since the last survey" (*Id.*. p. 15). In an effort to improve student satisfaction in this area, PCI-Enfield stated that the school has implemented strategies to include having prospective students: complete a readiness questionnaire and meet with an admission representative; review the Practical Nursing information packet, complete acknowledgment forms, and watch the Practical Nursing Educational Acknowledgement video; and ensure that they have been Covid vaccinated and boosted for admission into the program (*Id.*, p.23).
- <u>Financial Aid</u>: The school stated that while the students surveyed have not participated in the financial aid process, the school attributes low student satisfaction in this area to overall dissatisfaction with delays in clinical placement and graduation. To address dissatisfaction in this area, PCI-Enfield stated that the school is reconstructing the "Educational Funding team" allowing students to work on-site with their designated representative to help resolve issues. Additionally, PCI-Enfield stated that the school is working with a 3rd party software company to streamline communication efforts and to assist with inquiries, with implementation estimated for May 2023. Lastly, the school stated that a kiosk station has been established on campus to allow students to meet with Educational Funding team members that may not be available on-campus at the time.
- Academic Progress: PCI-Enfield stated that the school, "believe[s] that low student satisfaction related to grades and academic performance is a direct result of the learning gaps created by the front loading of didactic courses, creating a disconnect between theory and the clinical experience" (*Id.*, p. 17). The school's plan to improve satisfaction in this area is to provide student support and offer tutoring sessions in person or via zoom, allow students to re-take failed courses, provide remediation courses to students "who have experienced delays in graduation" (*Id.*, p. 24), and to offer free repeats of the ATI-B (NCLEX Predictability assessment).
- Attendance: According to PCI-Enfield, student dissatisfaction in this area is closely related to the covid waiver expirations and return to on-ground delivery effective February 2022. PCI-Enfield stated that the school recognizes that, "students continue to struggle with life changes prompted by the pandemic" and that "the school closely monitors student attendance and has heightened referrals to student services when a formal accommodation may be appropriate to better support students requiring special consideration for health and/or learning related matters" (*Id.*, p. 24).

- <u>Faculty</u>: PCI-Enfield stated that while qualified faculty remains a high priority for the school, recruiting and retaining qualified faculty has been a challenge especially due to the campuses more remote location (being "further out" compared to other PCI campuses). Additionally, with the return to onground learning, PCI has struggled to attract and retain nursing faculty due to increased demand and higher than average compensation packages offered to experience nurses. To address dissatisfaction in this area, the school has implemented sign-on bonuses, referral bonuses, and a general public bonus for anyone who refers or applies and is hired as a qualified nursing instructor. Additionally, PCI-Enfield stated that the school is increasing tuition reimbursement and making adjustments to faculty wages, making the school more competitive in the market. Lastly, the school stated that it has interviewed and extended offers to 12 applicants, six (6) of which have accepted offers.
- <u>Learning Resource System</u>: PCI-Enfield stated that most currently enrolled students have completed the didactic portion of the program, therefore, the "use of the LRS resources are minimal and most likely contributing to the declining rate of student satisfaction" (*Id.*, p. 19). The school stated that all LRS resources are fully online and available to students 24/7, faculty and staff are prepared to answer any questions and flyers are posted throughout the school "outlining the LRS resources and how to access them" (*Id.*).
- <u>Facility</u>: PCI-Enfield stated that while there were issues with the doorbell and badge system that control access to the building, all repairs have been completed and the school maintains a clean and adequate environment. The school also stated that all lab and classroom equipment is in working order and any old equipment has either been discarded or placed in storage.
- Training Equipment: The school stated that the Enfield campus has not had enrollments since October 2021 and as such, the students filling out the survey were the students that were effected most by delays in equipment orders as a result of the pandemic. Specifically, the school stated that at the beginning of each term disposable equipment is ordered in sufficient numbers to accommodate each student, however, due to a delay caused by COVID, students during that time had to share school equipment.
- Overall Experience: PCI-Enfield stated that the school believes overall student experience has decreased significantly since the last survey mainly due to the continued frustration with extended delays to clinical placement and graduation. To improve student satisfaction in this area, the school continues to "pause enrollment" (*Id.*, p. 25) until all students are placed in clinical sites. Additionally, the PCI-Enfield stated that the school continues to seek for qualified faculty and will continue to make every effort to support students through the challenges that are facing.

PCI-Enfield stated that the school has no enrolled students in the Practical Nursing (Diploma) program since October 2021 and that the school "does not intend to enroll new students until all currently enrolled students can be assigned to clinical rotations and are on track to graduate" (*Id.*, p. 21). While the Commission acknowledges that the school has suspended enrollment, the Commission formerly directs the school to **cease enrollment** into the Practical Nursing (Diploma) program until the aforementioned concerns regarding student satisfaction are alleviated.

To address the overall concerns with the Practical Nursing program, PCI-Enfield stated the following:

If faculty retention, student graduation rates and student satisfaction increase as a result of this infusion of faculty, we will prepare a study for controlled resumption of enrollment at PCI-Enfield. If we do not see any increase in clinical placements and corresponding increases in student satisfaction and graduation by July 2023, then we will perform a full viability study for PCI-

Enfield and submit a teach-out plan for the Practical Nursing program [emphasis added] if warranted by the results of the viability study (Id., p. 26).

In addition, the Commission noted that the school reported 18 of the 59 students starts on the Graduation and Employment Chart for the 15-month Practical Nursing and 8 of 24 students starts on the Graduation and Employment Chart for the 21-month Practical Nursing programs in the Transfers to Another Program/Cohort" category. The Commission reminds PCI that the school should utilize the "Transfers to Another Program/Cohort" category as follows: 1) the total number of students transferred out of the program and into another ACCSC-approved program, or 2) the total number of students who return from an approved leave of absence; are unable to complete the program within 150% of the normal program length from the original start date due to the leave of absence; or transferred to a later cohort in order to graduate within 150% of the normal program length as adjusted based on the length of the approved leave of absence.

While the Commission appreciated the initiatives the school is taking, including completing a viability study of the program if the aforementioned efforts do not succeed, the Commission believes that since the Practical Nursing (Diploma) program is the only program currently offered at the school, a full viability study is necessary regardless of success.

Given the history and seriousness of the high levels of student dissatisfaction reported over a three-year period, the Commission remains concerned that many of the areas surveyed have not shown improvement but rather increased the student dissatisfaction rates. While the Commission acknowledged the impact of the COVID-19 pandemic on the school's Practical Nursing program, the Commission also noted that student dissatisfaction began before the pandemic. PCI-Enfield is reminded, the ACCSC accreditation process and the *Standards of Accreditation* establish that the "burden rests with the school to establish that it is meeting accrediting standards" (*Introduction, Standards of Accreditation*). Although the Commission has not yet made a determinative finding of non-compliance with accrediting standards, the school's continued inability to report acceptable levels of student satisfaction will likely lead the Commission to conclude that the school has failed to demonstrate compliance with accrediting standards and a stronger action in accordance with *Standards of Accreditation*.

Based on the foregoing, the Commission determined that additional monitoring of student satisfaction is warranted and voted to place PCI-Enfield on Warning. Accordingly, the Commission directs PCI-Enfield to submit the following:

- a. A detailed description of the issues continuing to delay the process of placing students in clinical sites including evidence of steps taken by the school to place students (i.e., evidence of clinical sites contacts, description of the reasons students cannot be accepted in a clinical site, timelines as to when students can be accepted in a clinical site, etc.);
- b. A list of the students that are still awaiting clinical sites and a timeline as to when the students will be placed using the following format;

Count	Student ID#	Graduation / Expected Graduation Date	# of Days Awaiting Clinical Site	Date Student Will be Placed in Clinical Site
1				

c. From the list in item (b.) above, a detailed description of the school's strategies to support students who are struggling academically and require additional support, tutoring, and remediation, and preparation upon graduation (e.g., NCLEX preparation, etc.);

- d. An update on the newly hired faculty to include recruitment and retention strategies and a description of how qualified faculty have impacted the increase in available clinical sites;
- e. A Program/Institutional Viability Study, or a copy of the results of the school's internal viability study, that includes the following analysis and assessment:
 - i. Analysis of the adequacy of faculty, staff, and student services available to students as it relates to student satisfaction, to include the school's ongoing plans as established in the school's IAIA;
 - ii. Given the gap between the didactic portion of the program and the clinical rotation and graduation, provide an analysis of the program's graduation processes demonstrating that students are prepared for clinical sites, to sit for the NCLEX exam, and are ready to be employed in field;
 - iii. An assessment of the admissions process demonstrating the school's ability to increase and retain students:
 - iv. An analysis of the retention activities ACCSC Retention Charts¹ for the Practical Nursing (Diploma) program using a **July 2023** Report Date; and
 - v. If the school, as part of the program viability re-surveys the student population, provide the survey results and analysis;
- f. A <u>Institutional Teach Out Plan Approval Form</u>;
- g. A Graduation and Employment Chart(s) for the Practical Nursing (Diploma) program using July 2023 Report Date;
- h. Summary information for the Graduation and Employment Chart(s) 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:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Practical Nursing	1/10/21	2/1/22	N/A
2	12346	Practical Nursing	1/10/21	N/A	7/10/21

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

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

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

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

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

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

Available for download at http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp

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.

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

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File
1						

i. 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 student satisfaction requirements.

Warning Restrictions:

Pursuant to Section VII (K)(8), Rules of Process and Procedure, Standards of Accreditation, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Teach-Out Plan Requirement:

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an <u>Institutional Teach Out Plan Approval Form</u>, which must be submitted as part of the response for the items listed above.

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.

PCI-Enfield 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.

PCI-Enfield must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by <u>clicking here</u>. 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

⁴ ACCSC has issued two modules of the **Blueprints for Success Series** – <u>Organizing an Effective Electronic Submission</u> and <u>Preparing a Comprehensive Response for Commission Consideration</u> – 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 <u>Resources section</u> at <u>www.accsc.org</u>.

the College 360 database. The Instructions for Electronic Submission can be found <u>here.</u> A detailed overview on how to upload a school submission can be found <u>here.</u>

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 <u>on or before August 17, 2023</u>. If a response, the required fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission's office <u>on or before August 17, 2023</u>, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact. 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
Sincerely,
Michale S. McComis, Ed.D.
Executive Director
e:

⁵ ACCSC assesses a \$500 processing fee to a school placed on Warning.