



Accrediting Commission of Career Schools and Colleges

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December 9, 2022

ELECTRONIC DELIVERY

[Redacted]

Walnut Hill College
4207 Walnut Street
Philadelphia, Pennsylvania 19104

*School #M001036
Continued Warning*

Dear [Redacted]

At the November 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its July 19, 2022 decision to place Walnut Hill College (“WHC”) located in Philadelphia, Pennsylvania on Warning with a subsequent review to be conducted in conjunction with the Corresponding On-site Evaluation (“COSE”) required as part of the school’s renewal of accreditation application. Upon review of the October 4, 2022 On-site Evaluation Report (“OER”) for the Renewal of Accreditation (Corresponding On-Site Evaluation), Initial Distance Education, and Warning evaluation conducted on September 15, 2022, and the school’s response to that report, the Commission voted to continue the school on Warning to the May 2023 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

- 1. WHC must demonstrate successful student achievement by a) maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education and b) supporting student achievement rates through student transcripts, the school’s verifiable records and documentation of initial employment of its graduates, (*Section VII (B)(1)(b)*, and *Appendix VII Guidelines for Employment Classification, Substantive Standards, Standards of Accreditation*).

In response to the October 4, 2022 OER, the school reported student achievement rates via Graduation and Employment (“G&E”) Charts using a July 2022 Report Date as directed.

Program	Length In Months	School Graduation Rate	ACCSC Benchmark Graduation Rate	School Employment Rate	ACCSC Benchmark Employment Rate
Culinary Arts (AS)	18	32%	47%	40%	70%
	24	17%	40%	100%	
Culinary Arts (BS)	18	40%	47%	50%	
Hotel Management (BS)*	18	57%	47%	50%	
Hospitality Management (AS) **	18	39%	47%	0%	
Pastry Arts (AS) ***	18	60%	47%	56%	
	24†	50%	40%	0%	
Pastry Arts (BS)	18	75%	47%	67%	
Restaurant Management (BS)	18	60%	47%	33%	

July 2022 Report Date.

*The July 2022 rate listed for the Hotel Management (BS) program is from page 2 of the OER list of data provided to the team at the time of the on-site evaluation. This program was inadvertently omitted from the request for updated G&E Charts and therefore there was no updated data provided in the response. In the 2022 Annual Report, the school reported a graduation rate of 57% and an employment rate of 75%, both which meet benchmark; however given the differences in rates, the Commission is requesting further information.

** Formerly Hotel Management.

*** The July 2022 rate listed for the Pastry Arts 24-month (AS) program is from page 2 of the OER list of data provided to the team at the time of the on-site evaluation. The school was not required to submit a G&E Chart in response.

†As acknowledged in the July 19, 2022 Warning letter, the school’s Outcomes Report had indicated that the school recognizes the history of low student achievement rates for the 24-month version of the Culinary Arts (AS) program and stated that although not requested in the June 21, 2021 Outcomes Reporting letter, the 24-month Pasty Arts (AS) program faces similar challenges and deficits as it relates to enrollment and student achievement outcomes. Therefore, the school indicated that it has elected to cease enrollment in the 24-month version of these two programs.

The Commission found that WHC reported the graduation and employment rates highlighted above that fall below ACCSC's student achievement benchmark rates.¹ In addition, there was a discrepancy in the accompanying documentation. Specifically, the documentation information submitted to support the data for the Culinary Arts (BS) program lists 7 graduates; however the G&E Chart lists 6 graduates. In addition, in some cases the school provided different student achievement rates to the on-site evaluation team (see page 2 of 13 of the OER) as compared to the rates in the G&E Charts in the school's response (the response rates appear to match the data in the 2022 Annual Report submitted by the school). Given the small cohorts it may be that additional students gained employment such as in the Hotel Management program the Annual Report rate of 75% represents 3 out of 4 graduates and the 50% rate provided to the team would have represented 2 out of 4 graduates. At any rate, the school will be provided an opportunity to give an explanation for differences and changes for the applicable programs.

The response states that the COVID-19 pandemic devastated the restaurant and hospitality industries and that WHC faced significant challenges in almost every area of school operations, including staffing, new enrollments, student retention, and graduate employment. The response goes on to state that since the pandemic the school has now found that the demand for graduates from its hospitality and culinary programs has increased significantly and that the school regularly receives requests from local, regional, and sometimes national employers, seeking graduates from WHC. The school stated that the Occupational Network (O*Net) sponsored by the U.S. Department of Labor suggests that Cooks/Chefs and Lodging Managers have a bright outlook with expectations of growth to be much faster than average (11% or higher), whereas Pastry Cooks/Chefs and Restaurant Managers are expected to grow faster than average (8% to 10%); however the response does not include a copy or link to the ONET data to support this statement.

The Commission also has acknowledged the impact of the pandemic on student achievement and to that end issued guidance on December 21, 2021 regarding reporting students on the G&E Chart. Given the school's description of the pandemic's impact, the Commission is interested to know whether the school used the COVID-drop allowance and whether any of the withdrawals on the G&E Charts should have been categorized pursuant to the allowance.

The response also indicates that WHC completed an analysis of retention for enrollments from the 2021/2022 Academic Year (starts in September of 2021 and February of 2022) for each program in which the school is currently enrolling students. The retention rates for the students who started in September 2021 for all programs is 83% and those students are currently completing their fifth of six terms and therefore the school expects most will graduate. The same data was collected and analyzed for the February 2022 cohort start date which shows an overall student retention rate of 90%. The Commission found the retention rate information to be helpful in showing progress and that the programs appear to be tracking toward improved graduation rates. Conversely, WHC analyzed employment rates for students who graduated in the calendar year 2022 which appears to show that while some programs are meeting benchmark, just as many are below benchmark.

Overall, the Commission took into account the school's history of below-benchmark student achievement rates, the school's current efforts, and the prospects for ongoing improvement and determined that while there are indicators to support the prospect of increased rates of graduation and employment, further follow-up is warranted. Accordingly, the Commission directs the school to submit the following:

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

- a. The school’s student achievement improvement plan for all programs specifically addressing any enhancements or modifications made in the following areas:
 - i. Admissions requirements and process;
 - ii. Curriculum and/or training equipment;
 - iii. Teaching methods and/or materials;
 - iv. Learning resources;
 - v. Student Services; and
 - vi. Career services and employer engagement.
- b. An evaluation of current employment trends including an assessment as to when the school’s programs graduation and/or employment rates are expected to meet ACCSC’s benchmark rates.
- c. An analysis of the impact of the pandemic on the school’s reported graduation and employment rates with an explanation as to whether the school followed and used the guidance set forth in the December 21, 2021 Accreditation Alert when reporting the rates in its previous response.
- d. An explanation for the discrepancies in reported student achievement data between the information provided to the team as listed in the OER (page 2 of 13), as compared to the 2022 Annual Report and the charts submitted by WHC in the response to the OER for the following programs: Hotel Management (BS), Culinary Arts (BS), Pastry Arts (BS), Culinary Arts (AS) 18-month.
- e. An analysis of retention activities and ACCSC Retention Charts² for each program offered at the school using a **January 2023** Report Date.
- f. G&E Charts for all programs using a **January 2023 Report Date**.
- g. Summary information for each G&E 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:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Cosmetology	01/10/2021	06/01/2021	N/A
2	12346	Cosmetology	01/10/2021	N/A	07/10/2021

- 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 field³ (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 ⁴ (i.e., graduate or employer)
1								

- 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:

² Available for download at <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>

³ See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

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

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

- 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						

- h. A drop analysis for each G&E Chart, that lists each student classified as withdrawn/terminated and the reason for the withdrawn terminated status (i.e., COVID reasons, SAP termination, attendance termination, withdrawal by student).
- i. 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.

On December 21, 2021, ACCSC issued an [Accreditation Alert](#) regarding COVID-19 guidance for student achievement reporting effective for any Graduation and Employment Charts submitted with a January 2022 Report Date going forward. Specifically, in any instance where a school classified a student as having withdrawn as a result of circumstances related to the COVID-19 national emergency as set forth in the Department of Education’s guidance, the school may also classify that student as “Unavailable for Graduation” on the ACCSC Graduation and Employment Chart. This will, effectively, remove the student from the graduation rate calculation. As stated in the Department’s Federal Student Aid (FSA) [Guidance for Interruptions of Study Related to Coronavirus \(COVID-19\) \(Updated June 16, 2020\)](#), allowable circumstances include, but are not limited to, illness of the student or family member, need to become a caregiver or first responder, loss of childcare, economic hardship, inability to access Wi-Fi due to closed facilities, or an increase in work hours as a result of the COVID-19 emergency.

In addition, any institution that moved students from ground-based instruction to distance learning, closed campus housing or other campus facilities, or experienced other interruptions in instruction during a term within the covered period may consider all withdrawals from students enrolled in affected programs during that term to have been the result of circumstances related to the COVID-19 national emergency. If the school reported a student as withdrawn due to COVID-19 to the Department, the school is expected to maintain the documentation that satisfied the Department’s requirements to classify the student in the Unavailable for Graduation category. For non-Title IV students, documentation may be similar for students classified as Unavailable for Graduation, such as a written attestation from the student that he/she can no longer attend classes due to COVID-19 would be sufficient.

2. WHC must demonstrate that the school publishes in its catalog and enforces a policy of acceptable student attendance (*Section VII (B)(3)(b), Substantive Standards, Standards of Accreditation*). The questions regarding WHC’s attendance policy were raised during the Commission’s ongoing review of the school’s refund practices. As noted in the OER, “issues related to late refunds and satisfactory academic progress appeared related, at least in part, to the school’s former grade and attendance tracking practices” (page 7). The on-site evaluation team found that the school has revised its practices to monitor attendance more frequently and to identify when intervention is necessary. Upon review of

the revised policy, the Commission questioned whether the revisions provide sufficient structure regarding the measurement of satisfactory attendance and the determination of the date a student has withdrawn. In addition, there appear to be discrepancies in the statement of the makeup policy and a lack of documentation that the attendance policy has been implemented as described.

Attendance Policy

In response to the OER, WHC provided a catalog showing the publication of the revised attendance policy. The Commission noted that the policy is primarily designed to monitor attendance by course, rather than by program. The policy has two differing requirements based on the type of course in which the student is enrolled: one is for Lecture, Demonstration, and Supervised Lab courses and one is for Production and Operations courses. The policy also has differing requirements depending on whether a course meets once per week or twice per week. An overview of the attendance policy is as follows:

- For courses that meet once per week, students are allowed two absences – any student who exceeds two absences will be withdrawn from the course;
- For courses that meet twice per week, students are allowed three absences; and
- For Production and Operation courses (regardless of number of meetings per week), each absence requires a make-up that must be completed within three weeks from the date of the absence and prior to the end of the term – any student who exceeds the required number of absences (two or three depending on the number of class meetings per week) or fails to complete a make-up will be withdrawn from the course.

According to the catalog (WHC’s response to the OER, PDF pg 301) , the school monitors attendance beginning in the second week of each term. The school runs a weekly report that reports the student absences per course. According to the policy: “[s]hould it be determined that a student has exceeded the number of allowable absences in a specific course(s), the student is notified in writing of a course withdrawal and they are withdrawn from that course.” While WHC may use a “per course” attendance policy, the school is ultimately responsible for assessing student progress and success in relation to ***program [emphasis added]*** objectives and effectively assessing satisfactory student progress through the ***program [emphasis added]*** (*Section VII, Statement of Purpose, Standards of Accreditation*). The Commission found that the policy does not explain how the school uses the information collected on a per course basis to make a determination regarding sufficient progress through the program.

Date of Determination

As noted previously, the Commission’s questions regarding the timeliness of refunds centers on the school’s ability to make timely determinations that a student has withdrawn. As the school has a definitive date of withdrawal when a student submits notice in writing, the school’s policy must address how a date of withdrawal is determined in absence of notification from the student. A commonly accepted practice is to establish a number of days of consecutive absences from the program that triggers the determination that the student is not returning. The WHC attendance policy defines the process for determining the student is withdrawn, “[i]f the school determines that the student has dropped below the number of allowable absences in all their courses, the student is withdrawn from all courses, and by default, withdrawn from Walnut Hill College, as the student is no longer enrolled in any courses.” WHC did not specify how the school determines the official date of withdrawal. It is not clear from the information provided how long it may take the school to make the actual determination. According to the policy, attendance is tracked on a weekly basis and when excessive absences are detected; “investigations” are initiated. The policies do not define the timeframes in which these actions take place and when the actual determination of withdrawal occurs.

The refund policy defines date of withdrawal as the “students last date of attendance.” (Catalog addendum, PDF page 321 of the OER response). The Commission is concerned that the school has set an unreasonably restrictive policy that may not be supporting the school’s efforts to make timely refunds. As stated in the catalog addendum, “[r]efunds calculated under this policy shall be sent to the student within 30 days of notice of cancellation, or the date the school determines the student has withdrawn.” Because the school defines the date the student has withdrawn as the last date of attendance, any time that the school takes to determine that a student has withdrawn counts against the timeframe in which to make the refund.

In reviewing the response to the OER, the Commission noted that the refund reviewed as part of the on-site evaluation illustrates the systemic issues impacting refunds. During the on-site evaluation, the school provided the on-site evaluation team with the record for the only student was terminated between March 1, 2022 and September 9, 2022, as directed. Upon review of the refund report summary sheet and refund report worksheet, the team noted that the student’s last date of attendance was March 17, 2022 and the refund was issued on May 28, 2022. According to the response, the student was informed on March 26, 2022 that:

...[redacted] was being withdrawn from 4 courses due to excessive absences. Additionally [redacted] was informed that she remained in only one course at that time. Student was informed that they were not permitted to be late to, nor have any absences in the remaining course or they would be withdrawn from the course and dropped from the program.”

The instructor reported no subsequent tardies or absences for this student. On May 17, 2022, the student informed the Financial Aid office that [redacted] had not returned to school following spring break. Six days later, on May 23, 2022, the Student Success office contacted the student about not returning to class. The student did not respond and was placed on Flash Report on May 27, 2022 for withdrawal. The refund was made May 28, 2022.

The explanation raises questions about whether the process of attendance monitoring and oversight mechanisms at WHC are effective. In addition, the Commission noted that WHC did not determine that the student had withdrawn until 71 days after her last date of attendance, making it impossible for the school to comply with its own policy of returning refunds within 30 days of the day the school determined the student to have withdrawn, defined as the “last date of attendance.” While the Commission recognizes this occurrence may have taken place before the new policies were implemented, given the concerns with the new policy expressed here, more information is necessary.

Inconsistencies in the Make-up Policy

The Commission found that the requirements for making up classes are stated inconsistently within the policy. According to the school’s narrative with regard to Operations classes (WHC’s response to the OER, PDF pg 43):

Students missing any of these classes must make up the class at varying degrees, depending upon the day and/or number of classes missed.

- *Students who miss a class (first absence) must make up one class.*
- *The second absence in a term requires two make-up classes.*
- *Any absence on the day before or the day after a holiday requires three make-up classes.*

The statement in the catalog indicates that each absence requires one make-up class and that any absence the day of, before or after a federal holiday or school break requires two make-up classes. The Commission advises WHC to review its policies to ensure that the published requirements are stated in accordance with the school's policies and that the school's practices in this area are documented to show consistent implementation.

The Commission also noted that make-up classes must be completed within three weeks from the date of the absence or before the end of the term and that failure to complete all scheduled make-up classes before the end of the term will result in a course failure. The Commission questioned whether this allows for sufficient support of student progress, as it appears a student could reach the end of the course and still receive a failing grade. Students are required to repeat the course at an additional tuition charge. The policy does not make clear how many retakes of a course, after failure, are permitted.

The Commission noted the "Course and Program Withdrawal due to Non-Attendance policy" which states that,

***At any point** during a single term, should it be determined that a student has exceeded the number of allowable absences in a specific course(s), the student is notified in writing of a course withdrawal and they are withdrawn from that course. Students who exceed two (2) absences in courses that meet once per week, or, who exceed three (3) absences in courses that meet twice per week **are withdrawn** from the course in which the excessive absences occurred [**emphasis added**].*

This policy makes no mention of the requirement of make-up work for Production and Operations classes. Therefore, it is not clear whether the school takes into account that students have made up absences, or if termination is based strictly on exceeding the absences at any point in time.

Implementation of Policy

According to the response, the school uses the "Absences by Day By Course" report to monitor absences on a weekly basis. The school stated that this report shows the number of absences per course per term and the students Last Date of Attendance. However, the report provided in the response does not list the last date of attendance. In addition, the report is unclear as to how the information aligns with the school's policies. The report lists the number of absences and in some cases the "dropped" date. It appears that 3 or more absences results in termination from the course with the exception of "Operations" courses which show 3 absences without a termination noted. Overall, the Commission found that the documentation does not show how the school is consistently implementing the new attendance policies.

Based on the foregoing, the Commission found that the school has made an attempt to establish more structured processes for monitoring sufficient attendance; however, it is not clear that the school has fully addressed determining sufficient attendance in the context of achievement vis-à-vis program outcomes. In addition, questions remain regarding the internal consistency of the policies, and the consistent implementation of the policies.

Accordingly, the Commission directs the school to evaluate its attendance policies, make appropriate revisions, and submit the following:

- a. A description of the school's revised attendance policy, including the following:
 - i. Any explanation of how the school uses the information gathered on a per courses basis to evaluate sufficient levels of attendance necessary to achieve program objectives;

- ii How the school determines the date a student has withdrawn (e.g., how many days of absences will constitute a withdrawal).
- iii. A consistent description of the make-up policy
- b. A copy of the school’s catalog cross-referenced to the Catalog Checklist showing the publication of the revised policies;
- c. A list of ten students who most recently withdrew under the new policy without providing written notice, using the following format:

Student ID#	Start Date	Last Date of Attendance	Date of Determination of Withdrawal	Refund Due Date	Date Refund Paid	Refund Amount

- d. For each student listed above:
 - i. Individual attendance records for the students listed above, to include documentation of approved leave of absences (as applicable);
 - ii. A copy of the school’s attempt(s) to notify the student that continued failure to attend classes will result in termination; and
 - iii. An explanation for any student for whom a determination of withdrawal was not made in accordance with the published policy; and
 - e. Any additional information that the school believes will be useful to demonstrate compliance.
3. WHC must demonstrate that the school makes timely refunds in accordance with the published refund policy (*Section I (D)(3), Substantive Standards, Standards of Accreditation*). It appears to the Commission that the primary factors impacting WHC’s ability to make refunds in a timely manner are the school’s policies and procedures related to attendance and progress monitoring, as explained in the preceding item. It also appears to the Commission that the school is making efforts to remake and implement its policies to ensure fair and consistent application. As such, the Commission determined that further follow-up is needed to see whether WHC can provide documentation to show the ongoing, fair, and consistent application of its policies. Accordingly, the Commission directs the school to submit the following:
- a. An ACCSC Refund Report for the ten students who most recently withdrew under the new policy without providing written notice from the previous item:
 - i. Refund Report Summary Sheet;
 - ii. Refund Report Worksheet;
 - iii. Student ledgers for each of the students demonstrating tuition charges applied, tuition funds paid, refunds issued;
 - iv. Documentation of approved leave of absences, as applicable;
 - v. Documentation of refunds, e.g., copies of all electronic refund transactions, refund checks – front and back – and any other methods used for the purpose of student refunds); and
 - vi. Be prepared to provide an explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school’s refund policy; and
 - b. Any additional information that the school believes will be useful to demonstrate compliance.

4. WHC must demonstrate that the school terminates any student who does not satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives based on the school’s assessment criteria and satisfactory progress policy. In addition the school must demonstrate that it has a policy and process to assess student academic progress throughout the program and to inform students of their academic progress at established and specific intervals (*Section VII (A)(3)(a)&(e-g), Substantive Standards, Standards of Accreditation*). At issue are the school’s assessment practices, which appeared to provide too few evaluation points for the school to determine the likelihood that the student would be able to attain the program objectives. Specifically, WHC’s previous practice was to monitor grades once each academic year, which resulted in the school failing to identify students that had fallen below the minimum requirements. During the on-site evaluation, the on-site evaluation team noted that the Student Satisfactory Progress (“SAP”) policy had been updated to require faculty to track grades more closely and formally refer students to the Student Success office for advising, as needed. However, at the time of the corresponding on-site evaluation, the school could not provide documentation to demonstrate the consistent application or effectiveness of the revised policy. In response to the OER, WHC provided a copy of the school’s updated SAP policy. Upon review of this policy, the Commission questioned whether the policy results in adequate monitoring of satisfactory academic progress.

The school’s updated policy refers to two different intervals: a term and an academic year. The term consists of 10 weeks, and a full-time academic year consists of three, 10-week terms. An Associate of Science is comprised of two academic years (six terms) and although the Bachelor of Science is comprised of four academic years (12 terms), a student must already have completed an associate degree for admissions. As a result, each degree program consists of two academic years. According to the school’s policy, a transcript is issued at the end of each term, providing a grade point average (GPA) for each term and a cumulative GPA. However, the school evaluates the cumulative GPA for satisfactory progress only at the end of the academic year, or every third term. The requirements to maintain satisfactory academic progress are outlined in the table below:

ASSOCIATES DEGREE		
Interval	Credits	Minimum GPA Required
Year 1	0-36	1.5
Year 2	36-72	2.0
BACCALAUREATE DEGREE		
Year 3	72-108	2.0
Year 4	108 & up	2.0

It appears that the school does not intervene until the midpoint of the program. Once the school conducts a formal evaluation of satisfactory academic progress at the end of the academic year, the consequences for failing to meet the criteria are implemented on a term-by-term basis, are as follows:

- Upon completion of the first academic year, students who fail to meet SAP requirements as described above will be placed on Academic and Financial Aid Warning for the following term.
- A student who fails to meet the SAP requirements following the Academic and Financial Aid Warning term will be placed on Academic and Financial Aid Suspension. These students will be placed into ‘Academic Retake’ status, which permits students to retake courses until satisfactory progress can be obtained.
- Any student who does not satisfactorily progress towards obtaining SAP in three consecutive terms will be terminated.

Although the policy states that the formal evaluation of satisfactory academic progress is at the end of the academic year, it appears that students who meet satisfactory progress requirements at the midpoint

of the program will not receive another evaluation until the end of the program. At that time, it would be possible for a student to be at the end of the program, fail to meet SAP criteria, and never receive feedback from the school. In addition, the Commission noted that there does not appear to be a defined time period for Academic and Financial Aid Suspension. A student may be placed in this status “until satisfactory progress can be obtained.” The policy also does not appear to indicate that there is feedback or evaluation to students in this status. From the policy, it appears that the student may continue to work on obtaining satisfactory progress for the remaining two terms of the program, and if the requirements are not met, will be terminated for failing to make SAP in three consecutive terms, without additional intervention from the school. Accordingly, the Commission questioned whether the design of this policy provides sufficient evaluation points for the school to identify a student who does not satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives.

To show evidence of the revised policy’s implementation, WHC provided documentation for the one student placed on “Academic and Financial Aid Warning (probation)” since the COSE. The response includes documentation of a meeting with the student on September 26, 2022. The school staff person “[m]et with the student to discuss 1.95 GPA, Academic & Financial Aid Warning and provisional acceptance/Nutrition retake.” According to the notes, the student was planning to take off the November 2022 term and must retake and pass Nutrition before he may resume the BS program.” The Commission noted that the SAP policy does not include information about “provisional acceptance,” which implies that a student’s enrollment has been interrupted and that conditions must be met for re-admission into the school. In addition to the meeting notes, the response includes an Academic and Financial Aid Warning Agreement dated September 26, 2022. The agreement states that the student is placed on Warning effective August 31, 2022. It appears that the school communicated with the student almost four weeks after the effective date rather than the two weeks as stated in the policy. And the agreement is signed by the student and the school another week after the date of the agreement, on October 3, 2022.

Based on the foregoing the Commission determined that WHC has not fully demonstrated assessment criteria and satisfactory progress policy that will effectively ensure the school terminates any student who does not satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives. Accordingly, the Commission directs the school to evaluate its satisfactory academic progress policy, make appropriate revisions, and submit the following:

- a. A description of the school’s revised satisfactory academic progress policy, including the following elements:
 - i. An explanation how the evaluation points provide adequate feedback to students to support satisfactory progress through the program;
 - ii The policy must define the period of time for each probationary period, regardless of designation (e.g., warning, suspension); and
 - ii. An explanation as to how the revised policy allows the school to identify and terminate students who are unable to satisfactorily acquire the minimum knowledge, skills, and competencies required by the program objectives;

- b. A list of the students who failed to meet the school SAP requirements at the most recent evaluation point, as organized below:

Student ID#	Start Date	Date of FA or Academic Suspension Notification	LDA (If Withdrawn)	Withdrawal or Termination Date

- c. For each student listed above, provide:
- i. Student advising documentation for all students identified in Chart b.;
 - ii. A copy of the notification to the student regarding academic or financial aid suspension; and
 - iii. A record of the notification of termination for each student identified in item b, as applicable; and
- d. Any additional information that the school believes will be useful to demonstrate compliance.
5. WHC must demonstrate that the school is attentive to its students’ education and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). Results from the student survey conducted during the evaluation indicated the following:
- 25% dissatisfaction with regards to Financial Aid;
 - 36% dissatisfaction with the Student Services;
 - 28% do not feel good about their decision to attend; and
 - 37% would not recommend the school to a friend.

In response to the OER, WHC stated that the Warning action likely had an impact on the survey results as well as the reduced staffing at the school and the difficulties in the industry due to the pandemic. The Commission found that while the response provided comprehensive context for not only the circumstances surrounding the survey results, but also an in-depth description of student services and *the school’s mechanisms for remaining attentive to student needs*, the Commission is interested in the results of an updated student survey to ensure the effectiveness of these initiatives. The response indicates that WHC has decided to utilize the ACCSC Student Survey to collect and analyze feedback more regularly from its student body, such as at the end of each academic year for students completing their freshman and junior years and graduating sophomores, therefore the Commission is interested in a follow-up report.

Based on the foregoing, the Commission directs WHC to survey a sample of not less than 50% of the student population, using either the ACCSC student survey or one that is substantially similar, and to submit the following:

- a. A narrative description of the student survey process and a copy of the survey instrument used.
- b. A detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction;
- c. A summary of any trends, isolated incidents, or general problems extracted from the comparison of the student surveys; and

- d. A detailed narrative of the school’s plan to address any areas of student dissatisfaction, if applicable, and any other information to support the efforts made to enhance a student’s experience at the school.

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.

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.

WHC 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.¹ 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.

WHC 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 March 16, 2022**. If a response, the required fee,² and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before March 16, 2022**, 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]

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Encls: Refund Report Summary Sheet
Refund Report Worksheet
ACCSC Student Survey

ACCSC REFUND REPORT SUMMARY SHEET

School Name:

School Number:

Refund Report Date Range:

Student Name	Start Date	Last Date of Attendance	Date of Determination of Withdrawal / Termination	Refund Due Date	Date Refund Paid*

*This is the date that the refund was distributed to or received by either the student or applicable funding source.

REFUND REPORT WORKSHEET

A separate worksheet must be completed for each refund made within the time period specified by the Commission.

Name of Student: _____ Date of Enrollment: _____

The maximum number of days for which the school must disburse refunds, as defined in the school's refund policy:	
Based upon the school's refund policy, select (a) or (b) below and enter the date the school used to calculate the number of days required to disburse the refund:	
(a) Last date of attendance	
(b) Date of determination of termination/withdrawal	
Date of refund disbursement:	
The actual number of days between (a) or (b) above and the date the school disbursed the refund:	

Attach to this worksheet a detailed explanation for why the refund was late (if applicable).

Length of program or period of enrollment:	
Percentage of program or period of enrollment completed:	%
Total tuition for program or period of enrollment:	\$
total amount of tuition collected:	\$
percentage of total tuition collected:	%
percentage of collected tuition retained (c):	%
percentage of collected tuition refunded (d):	%
Amount of refund	\$

Attach to the school's submission:

- One copy of the school's withdrawal/refund policy and attendance policy, as it appears in the school's catalog, must accompany the school's submission. If the school uses one or more state refund policies, please attach a copy of each state's refund policy. One copy per state will suffice for the entire Refund Report.
- The Refund Report Summary Sheet for all refunds included in this report.

Attach to this worksheet:

- Copy of the calculation sheet(s) showing how the refund was calculated,
- Copy of the front and the back of the refund check(s) or electronic transmission document(s).

THE REFUND REPORT WORKSHEET GLOSSARY

Name of student: As it appears on the signed Enrollment Agreement.

Date of enrollment: The date the Enrollment Agreement was signed.

Last date of attendance (a): The last day the student attended class.

Date of determination of termination/withdrawal (b): The date the student's enrollment was terminated either by voluntarily withdrawal or by termination by the school.

Date of refund disbursement: The date the refund check was processed and disbursed or electronically transmitted (Pell accounts).

Length of program or period of enrollment: The total length of the program, or period of enrollment for which tuition is charged, measured in either weeks, months, or clock hours, whichever is most appropriate for refund calculation purposes.

Percentage of program or period of enrollment completed: Length of the total program, or period of enrollment for which tuition is charged, completed divided by the amount of the length of the program or period of enrollment for which tuition is charged uncompleted.

Total tuition for program or period of enrollment for which tuition is charged: The total tuition cost for the program, or period of enrollment for which tuition is charged. This amount does not include application fees, books, supplies, uniforms, etc., unless those items are completely refundable by the school.

Total amount of tuition collected: The amount of refundable monies collected.

Percentage of total tuition collected: The percentage of refundable monies collected.

Percentage of collected tuition retained (c): The percentage of refundable monies collected that was retained by the school for training received by the student.

Percentage of collected tuition refunded (d): The percentage of refundable monies collected that was returned to the student, or to financial aid accounts on behalf of the student, for training which was purchased but not received by the student. Items (c) and (d) should total 100%.

Amount of refund: The dollar and cents amount of the refund.

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.