

February 12, 2018

ELECTRONIC DELIVERY

██████████
Director
CollegeAmerica-Denver
1385 South Colorado Blvd
Denver, Colorado 80222

School #M001507
Continued Warning

Dear ██████████

The Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) has considered its previous decision to continue CollegeAmerica-Denver (“CA-Denver”) located in Denver, Colorado on Warning. Upon review of the Commission’s April 27, 2017 Continued Warning Order and the school’s response, the Commission voted to continue CA-Denver on **Warning** and to ask the on-site evaluation team to review specific areas. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

Compliance with ACCSC Standards and Requirements on a Continuous Basis

As stated in ACCSC’s *Rules of Process and Procedure*, only “[a]pplicants for renewal of accreditation that are found to be in compliance with accreditation standards and requirements will be granted renewal of accreditation” (*Section I (G)(2)(a), Rules of Process and Procedure, Standards of Accreditation*). CA-Denver’s response to the April 27, 2017 Continued Warning Order does not demonstrate compliance with accrediting standards. The school continues to report below-benchmark rates of student achievement, has not resolved significant compliance issues with state and federal agencies, and is subject to ongoing Compliance and Litigation Reporting.

The Commission reviewed CA-Denver’s accreditation history and noted that the school’s most recent grant of accreditation was for a period of five years going forward from November 2007.¹ CA-Denver submitted an Application for Renewal of Accreditation to begin the process of renewing that grant of accreditation in September 2011. Over the last five years, the Commission has afforded CA-Denver multiple opportunities to conduct meaningful assessments and implement improvement plans and yet the school has not met the burden of establishing compliance with the *Standards of Accreditation* in the area of student achievement outcomes. An outline of the history of the Commission’s review of CA-Denver’s Application for Renewal of Accreditation is as follows:

- At the November 2012 meeting, the Commission noted the systemic student achievement issues at the CA-Denver campus. In accordance with that determination, the Commission directed the school to limit enrollment in all programs (excerpt from the December 21, 2012 deferral letter below).

CA-Denver did not demonstrate that the measures to improve graduation and employment described in the school’s response have had any impact to date.

As the student achievement issues have been systemic and on-going, the Commission directs CA-Denver to cap enrollment in every program. As of the date of this letter, programs that have less than 10 students enrolled must be capped at 10 students and programs that have more than 10 students enrolled must be capped at the program’s current enrollment level. This cap will remain in effect until the school is able to demonstrate successful student achievement

¹ See ACCSC’s letter dated March 11, 2009.

by maintaining acceptable rates of student graduation and employment in the career field for which the school provides education.

- At the May 2013 meeting, the Commission considered renewal of accreditation applications, substantive change applications, complaint notices, and other actions for the ACCSC-accredited schools in the Center for Excellence in Higher Education (“CEHE”) system of schools. Upon review of the record in these matters, the Commission expressed concern as to whether there are systemic issues with regard to recruitment, admissions, student achievement, advertising, state licensure, and cohort default rates throughout the CEHE schools under consideration and voted to issue a Show Cause order to direct the CEHE system of schools to show cause as to why accreditation should not be withdrawn.
- In November 2013, the Commission voted to vacate the system-wide Show Cause Order but also voted to continue the Show Cause Order for CA-Denver. After a year of ongoing monitoring, the Commission noted that CA-Denver continued to report low outcomes in a majority of the school’s programs (of the ten active programs with reportable outcomes, CA-Denver reported rates of student graduation and graduate employment for nine that fall below ACCSC’s benchmarks). At that time, the Commission called into question the school’s management as it pertained to fulfilling obligations to students.
- In November 2014 the Commission noted that CA-Denver continued to report low outcomes in a majority of the school’s programs. At that time, the Commission notified the school that continued failure to demonstrate compliance with student achievement standards would result in further programmatic and institutional actions (excerpt from the December 17, 2014 Warning Order below).

As set forth in Section VII (B)(2)(c), Substantive Standards, Standards of Accreditation, the Commission at its discretion may take a programmatic action such as to require an on-site evaluation; temporarily require a school to cease enrollment in a program; suspend or revoke program, degree-granting, or distance education approval; or may take an institutional action such as to issue a Warning or Probation Order (see Section VII, Rules of Process and Procedure, Standards of Accreditation) when the Commission has determined that the school has not demonstrated acceptable student achievement either through its student learning assessment efforts, rates of graduation or employment attainment, or a combination thereof. This letter serves as notice that the Commission will take further programmatic or institutional action if the school cannot demonstrate improvement in the student achievement outcomes of its programs.

- In May 2015, the Commission noted CA-Denver continued to report low outcomes in a majority of the school’s programs and raised questions with regard to the school’s request for additional time to demonstrate compliance, given the amount of time already afforded the school. The Commission directed CA-Denver to demonstrate that the school had been in continuous compliance with standards, and voted to place the school on Probation (excerpt from the June 17, 2015 Probation Order below).

The Commission’s expectations are that accredited schools will be proactive to assess the performance of programs and take appropriate action, including discontinuing programs that do not successfully serve students - without intercession from the Commission. The school is proposing to wait an additional two years to demonstrate compliance with accrediting standards in this regard, or to make the decision to discontinue programs that do not appear to be fulfilling the school’s obligations to students. Given the school’s history of serially low outcomes and the request for additional time to demonstrate compliance with standards, the Commission determined to impose an official limit on the school’s timeframe to come into compliance and therefore issued a Probation Order. Under the Probation Order, CA-Denver

must take appropriate action to come into compliance or the Commission may revoke program approvals or take any other action in Section VII, Rules of Process and Procedures, Standards of Accreditation.

- In November 2015, the Commission noted that CA-Denver reported above-benchmark rates for two programs and lifted the previously imposed enrollment caps. In addition, the Commission noted that CA-Denver had taken action to discontinue two programs with long histories of below-benchmark outcomes. On the basis that the school appeared to be taking action that would improve student achievement outcomes, the Commission voted to vacate the Probation Order; however, given that the school had yet to demonstrate compliance with accrediting standards after three years of monitoring, the Commission placed the school on a Warning Order (excerpt from the December 18, 2015 Warning Order below).

As noted in the history of Outcomes Reporting, at any given point in time, there has been a different set of programs under scrutiny. At each review, there are programs showing improvement while there are also programs showing a decline in student success. Once viewed longitudinally over time, the cumulative effect of years of Outcomes Reporting begins to look like an institutional issue rather than a programmatic issue. Persistently low rates lend to a conclusion that the school's management has not conducted an effective assessment in identifying the root cause of student achievement issues, or has not been able to develop an effective plan of action to improve student success, or has not devoted sufficient resources to the implementation of an effective plan of action, or all or some combination of the aforementioned.

- In August 2016 and upon reviewing the 2016 Annual Report, CA-Denver provided Graduation and Employment Charts for the Computer Technology & Networking (AAS), Healthcare Administration (BS), and Accounting (BS) programs, prepared using a June 2016 Report Date. The data shows that two² of the three programs continue to report rates of student achievement that fall below ACCSC's benchmarks. Based on these results and given the school's history of not demonstrating acceptable levels of student graduation and graduate employment, the Commission determined that a review of student achievement outcomes for all programs was warranted. Therefore, the Commission also took into account the rates of student achievement that CA-Denver submitted on the 2016 Annual Report. The Commission found that the data provided no evidence to show that CA-Denver made improvements in the baccalaureate degree-level programs such that these programs can be delivered in a manner that results in student success. Given the data and extensive history of reporting below benchmark student achievement outcomes in the baccalaureate degree programs, as stated in the letter dated April 27, 2017 the Commission voted to **revoke approval of the baccalaureate degree programs**. Therefore, the Commission directed the school to cease enrolling and to teach out all remaining students in the Accounting (BS), Computer Science (BS), Networking and Information Systems Security (BS), and Software and Mobile Applications Development (BS) programs. In addition, the Commission directed CA-Denver to undergo a supplemental review and **total re-evaluation**, beginning with an Accreditation Workshop and adhering with the established reporting requirements and timelines for completing the renewal of accreditation process. The Commission determined that it was crucial to continue monitoring the resolution of the other pending actions that may affect any or all institutions in the system of schools operated by CEHE such as the complaint filed by the Colorado Attorney General's Office against CEHE, and the False Claims Act Lawsuit brought by US Department of Justice and Qui Tam Plaintiffs.

² Computer Technology & Networking (AAS) and Accounting (BS)

Lastly, in the April 27, 2017 letter the Commission notified the school that *Pursuant to Section VII (M)(1), Rules of Process and Procedure, Standards of Accreditation*, where the Commission has found an area in which a school is out of compliance with accreditation standards or requirements, the period allotted to the school to remedy the noncompliance or cure the deficiency, together with the time for the Commission's final decision, will not exceed two years. Thus, the school must be able to demonstrate successful student achievement through the total re-evaluation process directed above.

Current Review: August 2017 Review

At the August 2017 meeting, ACCSC considered the Commission's previous decision to continue CA-Denver on Warning. Upon review of the April 27, 2017 Continued Warning Order and the school's response to that report, the Commission voted to further continue the school on Warning to be considered in conjunction with the results from the school's upcoming on-site evaluation for renewal of accreditation. The Commission's decision includes forwarding the following direction to the on-site evaluation team in order to close the loop on the items listed below.

1. As part of the ACCSC's April 27, 2017 Continued Warning Order, the Commission directed CA-Denver to "undergo a supplemental review and total re-evaluation, beginning with an Accreditation Workshop and adhering with the established reporting requirements and timelines for completing the renewal of accreditation process." As such, the Commission required CA-Denver to submit a Certificate of Attendance showing that "the director or other appropriate management personnel" attended the Accreditation Workshop as directed. In response, CA-Denver provided a Certificate of Attendance from the April 20-21, 2017 workshop for [REDACTED]. Given that ACCSC still has [REDACTED] as the Campus Director on file, it is unclear if [REDACTED] is the director or an appropriate management personnel. Therefore, the Commission requests that the on-site evaluation team provides the position and responsibilities of [REDACTED] in the Team Summary Report so that the Commission can determine whether the appropriate staff member attended the Accreditation Workshop as directed.
2. As part of ACCSC's April 27, 2017 Continued Warning Order, the Commission revoked approval of the baccalaureate degree programs and directed CA-Denver to cease enrollment and teach out all students remaining in the Accounting (BS), Computer Science (BS), Networking and Information Systems Security (BS), and Software and Mobile Applications Development (BS) programs. CA-Denver did provide the appropriate Programmatic Teach-Out Forms for the aforementioned programs in the school's response. Additionally, the school had previously provided Programmatic Teach-Out Forms for the Business Administration (BS) and Computer Science (BS) programs. As such, the Commission is interested in the level of attention given to the students in the discontinued programs and the success CA-Denver has had in executing the aforementioned programmatic teach outs in conjunction with other programs offered at the school. Therefore, in addition to reviewing the student outcomes for these programs, the Commission requests that the on-site evaluation team survey 100% of the active students at the on-site evaluation (to the extent that it is possible).

Warning Notification and Restrictions:

The Warning notification requirements and restriction previously set forth remain in effect.

Maximum Time Frame to Achieve Compliance:

As stated in the April 27, 2017 Warning Order, pursuant to *Section VII (M)(1), Rules of Process and Procedure, Standards of Accreditation*, where the Commission has found an area in which a school is out of compliance with accreditation standards or requirements, the period allotted to the school to remedy the noncompliance or cure the deficiency, together with the time for the Commission's final decision, will not exceed two years. Thus, the school must be able to demonstrate successful student achievement through the total re-evaluation process. The timeframe to achieve compliance began as of April 27, 2017 and ends on April 27, 2019. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

For further assistance or additional information, please contact me at [REDACTED].

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c: Susie Reed
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