



Accrediting Commission of Career Schools and Colleges

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October 21, 2020

ELECTRONIC DELIVERY

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██████████
Central Pennsylvania Institute of Science & Technology
540 North Harrison Road
Pleasant Gap, Pennsylvania 16823

School #M072487
Warning

Dear ██████████

At the August 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the following submitted by Central Pennsylvania Institute of Science & Technology (“CPI”) located in Pleasant Gap, Pennsylvania:

- Application for Renewal of Accreditation;
- Degree Program Application;
- Employment Verification Report; and
- Admissions Report

Upon review of the June 3, 2020 On-site Evaluation Report (“OER”) and the school’s response to that report, the Commission voted to place CPI on **Warning** with a subsequent review scheduled for ACCSC’s February 2021 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

1. CPI must demonstrate that the school only describes in its catalog, advertises, and enrolls students in new programs (degree or non-degree programs) after receiving prior Commission approval (*Section IV (E)(6)(e) Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team noted that CPI appeared to have currently enrolled students in three unapproved vocational programs and advertised the availability of additional unapproved programs. In response to the Commission’s June 3, 2020 OER, CPI submitted a revised catalog with asterisks indicating which programs were ACCSC-approved and which were non-ACCSC-approved programs. However, the Commission rules state that “all programs offered by a school that fall within the Commission’s scope must be approved by the Commission as within the school’s scope of institutional accreditation through the application for accreditation process and substantive change process” (*Section I (B)(1)(a), Substantive Standards, Standards of Accreditation*). While the Commission noted the revisions to the catalog, the Commission found that the issue of unapproved programs that appear to fall within the Commission’s scope of career-oriented areas of study persists. As noted in the June 3, 2020 On-Site Evaluation Report, the following programs appear to fall within ACCSC’s scope and are not approved by the Commission as required:

- a. Esthetician (Diploma)
- b. Energy & Emerging Infrastructure (Diploma)
- c. Bus Operators Training (160 hours)
- d. Class A CDL (320 hours)
- e. Class B CDL (160 Hours)
- f. Control Systems Technician (610 hours)

- g. Advanced Manufacturing Technician I (385 hours)
- h. Water Utility Operator/Technician (932 hours)
- i. Water & Wastewater Utility Operator/Technician (1,023 hours)
- j. Nurse Aide Training (120 hours)
- k. Cosmetology Teachers Training (600 hours)
- l. Nail Technician (200 hours)
- m. Esthetician (300 hours)
- n. CCNA: Collaboration
- o. CCNA: Routing and Switching
- p. Certified Information Security Manager (CISM)
- q. Cisco Certified Network Professional (CCNP)
- r. CompTIA Advanced Security Practitioner (CASP)
- s. CompTIA Linux+
- t. CompTIA Mobility+
- u. Forensic Computer Examiner
- v. Help Desk Analyst: Tier I Support Specialist
- w. Information Security Training
- x. Information Security Master Certification Training
- y. IT Security Survival Training
- z. ITIL Foundations Bundle
- aa. Microsoft Certified Solutions Associate (MCSA): Server 2008
- bb. SSCP Systems Security Certified Practitioner

In order to provide CPI an additional opportunity to show compliance with Commission standards, the Commission decided that additional information is required. Accordingly, the Commission directs CPI to submit the following:

- a. An [Application for a New Non-Degree program](#) for any of the above listed programs that is part of the school's program offerings going forward.
 - b. For any program that the school does not plan to offer going forward, CPI must submit an attestation indicating that the program is not part of the school's program offerings; and
 - c. A revised catalog cross-referenced to the Catalog Checklist that captures the revisions to the school's program offerings.
2. CPI must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In the June 3, 2020 OER, the on-site evaluation team noted that the school reported graduation and employment rates for several programs in the 2019 ACCSC Annual Report that did not meet ACCSC's minimum benchmark, as outlined below. In the school's response, CPI provided updated rates with a July 2020 report date.

Program (Credential)	Length in Months	CPI Graduation Rate	ACCSC Benchmark Graduation Rate	CPI Employment Rate	ACCSC Benchmark Employment Rate
Carpentry (Diploma)	9	100%	60%	50%	70%
Heavy Equipment Operations with CDL Licensure (Diploma)	9	100%	60%	63%	
Structural Welding (Diploma)	9	81%	60%	58%	

As shown in the chart above, the employment rates for the Carpentry, Heavy Equipment Operations with CDL Licensure, and Structural Welding programs all fell below the Commission’s benchmark.

CPI also submitted summary information for the reported rates and noted that the school’s informal surveys yielded information indicating that most students had positions in the field or job offers but that students were less likely to respond to formal surveys. CPI also noted that the school had worked to increase cohorts in its Carpentry program to increase opportunities for adult learners but discovered challenges with students not completing their education and pursuing jobs not in their area of study due to higher wages in other occupations. To help address the issue, CPI implemented an exit survey for those students as a means to address any areas of deficiency in the programs.

Although CPI began to address some of the factors affecting the school’s student achievement rates, it is evident that comprehensive strategies are needed to address the low rates as reported. In order to afford CPI with an opportunity to further develop its student achievement support strategies in Carpentry, Heavy Equipment Operations with CDL Licensure, and Structural Welding programs and to document the effectiveness of these strategies on the reported rates of student achievement, the Commission determined that further monitoring is warranted. Accordingly, the Commission directs the school to submit the following:

- a. The school’s student achievement improvement plan for the Carpentry (Diploma), Heavy Equipment Operations with CDL Licensure (Diploma), and Structural Welding (Diploma) 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 retention trends and employment trends including an assessment as to when the programs’ student achievement rates are expected to meet ACCSC’s benchmark rates.
- c. A Graduation and Employment Chart for the Carpentry (Diploma), Heavy Equipment Operations with CDL Licensure (Diploma), and Structural Welding (Diploma) programs using a **December 2020 Report Date**.

- d. Summary information for each 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	Cosmetology	01/10/17	06/01/2018	N/A
2	12346	Cosmetology	01/10/17	N/A	01/10/2018

- 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 field¹ (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification ² (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:

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

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

Count	Graduate ID	Program	Start 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						

- e. 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.

3. CPI must demonstrate that the school supports student achievement rates through verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b) & Appendix VII – Guidelines for Employment Verification, Substantive Standards, Standards of Accreditation*). In the June 3, 2020 OER, the on-site evaluation team noted that CPI provided a spreadsheet for program cohorts starting in 2016 and 2017 and that the submitted information did not contain appropriate supporting documentation. The team requested CPI’s policies and procedures for employment

¹ See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

² *Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation* requires the school to verify the employment classification.

verification, a copy of the verification form in use, and supporting documentation in line with the requirements of accreditation standards. CPI provided a description of its policies and procedures, its current verification form, and summary and supporting documentation for graduates who gained employment between March 1, 2020 and May 31, 2020.

In reviewing the supporting information provided both with items #1 and #2 of the June 3, 2020 OER, the Commission noted a number of graduates had placement dates prior to graduation, including a graduate with a first employment and last employment date prior to graduation, but that CPI indicated that career advancement was “not applicable.” Additionally, the Commission noted in the summary information provided in response to Item #1 of the OER that several job titles of graduates in the Heating, Ventilation, Air Conditioning & Refrigeration (Diploma) program (Maintenance Technician, Plumbing Assistant, and Service Technician) do not directly show the graduate’s employment in field for which training was provided and as a result, would otherwise lower the reported employment rate. Finally, as part of the request for additional information from the OER, CPI noted the increased use of social media to stay in contact with students and with potential employers. The Commission noted that while use of social media is acceptable to maintain contact with graduates and employers, it is not sufficient for employment verification. In order to afford CPI with an additional opportunity to document further its employment verification strategies, the Commission determined that further monitoring is warranted. Accordingly, the Commission directs the school to submit the following:

- a. Justification, to include job descriptions, for the designation as employed in field for the following reported Heating, Ventilation, Air-Conditioning & Refrigeration graduates:

Graduate ID	Job Title
██████████	Maintenance Technician
██████████	Plumbing Assistant
██████████	Service Technician

- b. For each graduate who gained employment between June 1, 2020 and August 31, 2020 provide the following information;

Count	Student ID	Program	Start Date	Graduation Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title
1	12345	HVAC Technician	01/10/2018	01/10/2018	HVAC Repair Industries, John Doe, 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2018	HVAC Technician
2	23456	HVAC Technician	01/10/2018	01/10/2018	AC Service, 456 Maple Dr., John Doe, Somewhere, VA 333.444.5678	3/1/2018	HVAC Technician

- c. The school must provide the following supplementary information for each graduate identified in item (b) above:
- i. A copy of the school’s completed verification form for each graduate employed;
 - ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:
 - The graduate’s name and contact information;
 - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
 - An attestation that the graduate is earning training-related income; and

- In cases where licensure is required for employment, an attestation that such licensure has been achieved.
- iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school; and
- d. Justification as to why the school did not designate the following graduates as “career advancement”;

Graduate	Graduation Date	Date of Initial Employment
██████████	1-9-2019	9-24-2018
██████████	6-3-2019	2-26-2019
██████████	6-3-2019	2-26-2019
██████████	2-11-2019	2-2018
██████████	2-11-2019	5-13-2018
██████████	2-11-2019	4-29-2018

4. CPI must demonstrate that all submissions to the Commission are prepared in accordance with instructions issued by the Commission (*Section I (F)(1), Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team found that CPI did not demonstrate that the school submitted the most recent Annual Report Graduation and Employment Chart employment records to the third-party verifier (Baker Tilly), as directed in Section VII (C) of the Self-Evaluation Report, as the given sample of records did not align with the reporting periods captured in either the 2018 or 2019 Annual Reports. In response to the June 3, 2020 On-Site Evaluation Report, the school stated that a misunderstanding between the school and its third party verifier due to the length of CPI’s programs. The Commission noted that the timeframe CPI referenced as being the annual report period sent to Baker Tilly, “school year 2016-2017,” and the number of graduates reported to Baker Tilly do not match the 2018 ACCSC Annual Report timeframes. Furthermore, the numbers reported show a 40% Unable to Verify rate. Finally, the Commission noted that the Baker Tilly’s report did not contain any of the disclosures required by the [ACCSC Guidelines for Independent Third-Party Employment Verification](#).

In order to ensure CPI’s understanding of the Commission’s instructions and verify the appropriate data, the Commission noted that further information was required. Accordingly, the Commission directs the school to submit a third-party verification report of the Graduation and Employment Charts as submitted in the 2019 ACCSC Annual Report (see chart below) in accordance with *Section I (F)(1), Rules of Process and Procedure, Standards of Accreditation* and including the appropriate disclosures required by the [ACCSC Guidelines for Independent Third-Party Employment Verification](#).

Program (Credential)	Length in Months	Reporting Period
Automotive Technology (Diploma)	9	March 2017-February 2018
Carpentry (Diploma)	9	March 2017-February 2018
CDL A Extended-600 hours (Diploma)	4	Oct. 2017-September 2018
Collision Repair Technology (Diploma)	9	March 2017-February 2018
Cosmetology (Diploma)	18	January 2016-December 2016
Dental Assisting (Diploma)	9	March 2017-February 2018
Diesel Technology	9	March 2017-February 2018
Landscape/Horticulture (Diploma)	9	March 2017-February 2018
Masonry (Diploma)	9	March 2017-February 2018
Medical Assistant (Diploma)	11	Dec. 2016-November 2017
Practical Nursing (LPN Training) (Diploma)	11	Dec. 2016-November 2017
Practical Nursing (LPN Training) (Diploma)	22	July 2015-June 2016
Precision Machine Technology (Diploma)	9	March 2017-February 2018
Structural Welding (Diploma)	9	March 2017-February 2018
Heating, Ventilation, Air-Conditioning & Refrigeration (Diploma)	9	March 2017-February 2018
Heavy Equipment Operations with CDL License (Diploma)	6	July 2017-June 2018

5. CPI must demonstrate compliance with advertising requirements, as outlined below:

- CPI must demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, or its accredited status (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). In reviewing CPI’s catalog, the Commission noted the use of the phrase, “state-of-the-art” in reference to the training offered by the Collision Repair Technology (Diploma) program which may lead to a misleading or exaggerated impression with regard to the school’s training. The Commission further noted CPI’s use of the restricted Department of Veterans Affairs logo on page 56 of the catalog which may lead to a misleading impression of CPI’s relationship with the Department of Veterans affairs or otherwise imply endorsement by the Department of Veterans Affairs.
- CPI must demonstrate that that currently enrolled students are not providing endorsements on behalf of the school (*Section IV (B)(4), Substantive Standards, Standards of Accreditation*) and that advertisements and promotional materials only provide information pertaining to potential salary that accurately portrays the normal range and starting salaries in the occupation for which training is provided. Salary information must also include the source of the information, which is valid (*Section IV (B)(5) Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CPI utilized several advertising and promotional materials that make vague and unsubstantiated claims about prospects of the graduates of the school’s programs and that those claims further lacked the required citation of sources. In its response, CPI provided revised advertising. The Commission noted that the revised printed brochure for the Heavy Diesel Construction – CASE Constructions Emphasis (AST) program that contained the citation, but the Commission found that the advertising maintained the vague phrasing of “High-paying High Demand Jobs” and does not clearly indicate the normal range and starting salaries of graduates.

- CPI must demonstrate that the school avoids advertising secondary educational objectives in a manner that would represent those courses as within the scope of the school’s ACCSC institutional accreditation unless and until the school has applied for and received Commission approval for such courses to be included within that scope (*Section II (D)(1)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CPI’s school catalog (pg. 44-60) and [website](#) advertised the availability of a wide variety of continuing education, testing, and certification courses that seemed to imply that these courses were included within the scope of ACCSC’s accredited (see Item #1 above). In response, CPI provided a revised catalog and website catalog link denoting which of the school’s programs are approved by ACCSC through an asterisk next to those programs approved by ACCSC. The Commission found that the catalog disclosure is not consistent throughout the document. While the table of contents in the digital program catalog contains the asterisk next to ACCSC-approved programs, the distinction is not provided within the individual program pages under the Associate in Specialized Technology Degrees, Auto/Diesel/Transportation, Construction Trades, Emerging Energy & Infrastructure, Healthcare, Cosmetology, and Culinary Arts sub-sections throughout the document. This is of particular concern due to the mix of ACCSC-recognized and non ACCSC-recognized programs in these sub-sections of the catalog. Moreover, the Commission found that the disclosure on CPI’s website is not consistent between ACCSC-recognized adult post-secondary programs and non-ACCSC recognized continuing education programs and further found that the continuing education and high school program webpages contain no language to indicate that those programs are not recognized by ACCSC.

In order to provide CPI with an additional opportunity to provide documents regarding its advertising, the Commission decided that further monitoring was required. Accordingly, the Commission directs the school to submit the following:

- a. Evidence that CPI is authorized to display the Department of Veterans Affairs seal or that the seal has been removed from the catalog;
 - b. Justification for the use of “state-of-the-art” in reference to the training offered by the Collision Repair Technology (Diploma) program using external validation and sources or evidence that the school has removed all references to “state-of-the-art.”
 - c. A description regarding the action taken (i.e. language removed, language revised, et.) by the school to address the vague phrasing of “High-paying High Demand Jobs”; and
 - d. Revised advertising that consistently and accurately represents the school’s approved programs and draws clear and consistent distinctions between ACCSC- and non ACCSC-recognized programs.
6. CPI must demonstrate that the school publishes a catalog that accurately portrays the school, its educational programs, policies and procedures, and that includes, at a minimum, all items listed on the ACCSC Catalog Checklist (*Section IV (C)(1)(a) Substantive Standards, Standards of Accreditation*).
 - CPI’s school catalog must provide, as required, an accurate representation of the total clock and/or credit hours for each program (*ACCSC Catalog Checklist item #11*). The on-site evaluation team noted that CPI’s catalog provided an inconsistent representation of the Advanced Manufacturing (AST) program and that the Practical Nursing (Diploma) program was not accurately represented. In response, CPI submitted a revised catalog showing consistency in the representation of the Advanced Manufacturing (AST) program. CPI further submitted its ECAR showing that the Practical Nursing (Diploma) program was approved for 1564 clock hours. The Commission noted

that per the its February 27, 2017 letter, the Practical Nursing (Diploma) program was approved at 1560 clock hours and that the inconsistency remains between ACCSC's approval, CPI's catalog, and the ECAR.

- CPI's school catalog must provide, as required, a clear description of each program offered by the school to include the title, scope and sequence, and course descriptions (*ACCSC Catalog Checklist item #14*). The on-site evaluation team noted that the catalog descriptions of many Diploma programs did not include any representation or information about the specific courses of those programs. The team additionally noted that the catalog used an unapproved title for the Advanced Manufacturing Technician (Diploma) program by using "Advanced Manufacturing Technician II." In response to the Commission's June 3, 2020 OER, CPI provided a revised catalog with updated program listings and corrected title for the Advanced Manufacturing Technician (Diploma) program. The Commission found that although the catalog contains a list and sequence of courses, the course titles alone do not constitute sufficient detail to serve as course descriptions. Additionally, the Commission noted the following programs in the school's ECAR that are not approved by ACCSC that otherwise appear to fall within ACCSC's scope: Cosmetology Teachers Program, Water Utility Operator, Water and Wastewater Operator, Control Systems Technician, High Performance Motorsports, Commercial Divers License A Program, and Natural Gas Compressor Technician.
- CPI's school catalog must describe, as required, the academic credential (e.g. certificate, diploma, or degree) awarded upon graduation for each program (*ACCSC Catalog Checklist item #23*). The on-site evaluation team noted that CPI's catalog did not clearly identify the credential awarded for CPI's diploma programs as they were listed below a combined category of "Diploma & Certificate." In response, CPI submitted a revised catalog showing the credential earned for some programs. However, the Commission found that for programs listed between pages 35-41 of the catalog, the credential earned is not listed, though the programs are under the same combined category of "Diploma & Certificate."

In order to give CPI an additional opportunity to show compliance with Commission standards regarding advertising, the Commission noted that additional monitoring is warranted. Accordingly, the Commission directs CPI to submit the following:

- a. A complete copy of the school's revised catalog containing adequate course descriptions and adequate description of awarded credentials and
 - b. An explanation as to the discrepancies between the programs listed in the school's ECAR and the school's list of ACCSC approved programs and evidence that CPI has submitted all required program applications or program modification reports to ACCSC to address the discrepancies between CPI's ECAR and the list of ACCSC approved programs.
7. CPI must demonstrate that all monies paid by an applicant are refunded if requested within three days after signing an enrollment agreement and making an initial payment (*Section I (D)(4)(b) Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school's catalog and enrollment agreement included inconsistent and contradictory representations of the school's cancellation refund policy that made the beginning, duration, and rules for cancellation unclear. In response to the Commission's June 3, 2020 OER, CPI provided a revised catalog and enrollment agreement showing its updated cancellation and refund policy and a list of and documents for the school's five most recent enrollment cancellations. The Commission found that item #2 of CPI's Cancellation and Refund Policy states that "CPI must refund all money paid if the applicant cancels

within five calendar days after the day the contract is signed, as long as the applicant has not begun training” which stands in conflict with the above ACCSC standard which allows for applicants to be refunded in full, if requested, within three days after signing an enrollment agreement and making payment even after beginning training. In addition, the school did not provide an updated enrollment agreement showing the inclusion of the revised policy.

In order to give CPI an additional opportunity to show compliance with Commission requirements regarding refunds, the Commission decided that additional monitoring was required. Accordingly, the Commission directs CPI to submit the following:

- a. A revised cancellation and refund policy in compliance with the above mentioned ACCSC standard and
 - b. A revised Enrollment Agreement and Catalog showing the inclusion of the revised cancellation and refund policy.
8. CPI must demonstrate that the school has and enforces an acceptable code of conduct for all school personnel whose primary responsibilities are to engage in recruiting and admissions functions prior to and during admission and matriculation (*Section IV (A)(4), Substantive Standards, Standards of Accreditation*). Additionally, CPI demonstrate that the school has in place policies and procedures and takes reasonable steps to ensure that its personnel do not make false, exaggerated, or misleading statements about the school, its personnel, its training, its services, or its accredited status and must ensure its personnel do not make explicit or implicit promises of employment or salary prospects to prospective students (*Section IV (A)(8), Substantive Standards, Standards of Accreditation*). Also, CPI must demonstrate that under no circumstance are currently enrolled students providing endorsements on behalf of the school (*Section IV (B)(4), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that CPI did not appear to have implemented any separation of duties between frontline admission/recruitment activities (such as tours and interviews) and admission decisions such as final acceptance of the enrollment agreement and that the same individual to conduct an admission interview would normally also sign and accept the enrollment agreement. In response to the Commission’s June 3, 2020 OER, CPI submitted a separation of duties chart and noted that CPI had decided to ask students to train as ambassadors and tour leaders to prospective students. These students would be trained by CPI’s curriculum specialist. While the Commission noted the separation of duties chart, the inclusion of current students as ambassadors and tour guides gives the Commission concern that the students are acting as school personnel but may not have the training to ensure the school’s compliance with accrediting standards for recruiting. Due to nature of the Commission’s concerns, the Commission decided that additional information was required to determine the school’s compliance with accrediting standards regarding recruitment.

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

- a. A description of the training given to students acting as ambassadors or tour guides;
- b. Evidence that students acting as ambassadors or tour guides sign the code of conduct; and
- c. A copy of any policies, procedures, or steps taken to ensure that these students act in compliance with *Section IV (A)(8), Substantive Standards, Standards of Accreditation*.

9. CPI must demonstrate that, prior to enrollment, the school determines that an applicant meets the school’s admission requirements (*Section V(A)(4)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that a substantial majority of current student and graduate files showed that CPI appeared to have signed and accepted the enrollment agreement prior to assessing whether the applicant met the school’s admission requirements (particularly with proof of high school graduation/GED, admission tests, background checks, health screens, student disclosure/acknowledgment forms, and personal reference letters. In response to the Commission’s June 3, 2020 OER, CPI submitted its admissions policies and procedures, a checklist, and a list of and copy of enrollment and admissions documentation for all students enrolled between February 1, 2020 and May 30, 2020 (1 student). The Commission found that the provided checklist does not account for all items that may be required under specific degree programs such as SAT/ACCUPLACER scores, healthcare work experience, drug test results, and Federal Motor Carrier Safety Administration physicals and drug screens. The Commission noted that the reported student enrolled in CPI’s Advanced Manufacturing Technician (AST) program but that the submitted documentation did not include verification of the receipt of SAT or ACCUPLACER scores.

In order to provide CPI with an additional opportunity to provide evidence that the school meets admission requirements, the Commission decided that additional monitoring was required. Accordingly, the Commission directs CPI to submit the following:

- a. A list of all students enrolled between June 1, 2020 and September 30, 2020 in the following format:

Student ID	Program	Date all Admissions Documentation Secured	Date Enrollment Agreement Signed and Accepted by the School	Class Start Date

and

- b. A copy of the enrollment agreement and admissions documentation secured for each student included in the list above that show that the student met the school’s admissions requirements prior to enrollment.
10. CPI must demonstrate that the school ensures that each applicant has an opportunity to review the enrollment agreement and is fully informed of the rights, responsibilities, and obligations of both the student and the school under the enrollment agreement before it is signed by the applicant (*Section IV(C)(2)(c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that executed enrollment agreements had blank spaces in the fields designated “Start Date,” “Completion Date,” “Down Payment,” and/or “Quarterly Payments.” In response to the June 3, 2020 OER, CPI submitted an updated process and form to prevent the blank fields. While the Commission noted the changes in process and form, the Commission noted that evidence of implementation was not provided.

In order to provide CPI with the opportunity to show the implementation of the described changes, the Commission decided that further monitoring was required. Accordingly, the Commission directs CPI to submit the following:

- a. A list of students enrolled since August 1, 2020, using the chart below:

Student ID	Start Date	Date Enrollment Agreement Signed by Student	Date Enrollment Agreement Signed by CPI Official

and

- b. Copies of fully executed enrollment agreements corresponding to each student listed in the chart (a.) above.

11. CPI must demonstrate compliance with faculty recordkeeping requirements as follows:

- CPI must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators, as required, to demonstrate compliance with applicable Standards of Accreditation (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CPI did not provide documentation of work experience verification for instructors [REDACTED].
[REDACTED]
[REDACTED] In response to the June 3, 2020 Commission letter, CPI provided faculty personnel reports for the requested instructors and documentation of work experience. In reviewing the submitted documentation, the Commission noted that for [REDACTED] [REDACTED] only a resume was submitted and did not show verification of work experience. Though CPI stated that the state of Pennsylvania does work history verification as part of its certification and that [REDACTED] is working toward such certification, no documentation was provided.
- CPI must demonstrate that faculty teaching technical and occupationally related courses in either non-degree or occupational associate degree programs have a minimum of three years of related practical work experience in the subject areas taught (*Section III (B)(5), Substantive Standards, Standards of Accreditation*). As noted above, the on-site evaluation team could not verify qualifications of instructors [REDACTED] [REDACTED] due to a lack of records provided during the review. Additionally, the team noted that [REDACTED] has only 2.5 years of practical work experience. In response to the June 3, 2020 OER, CPI provided the above referenced documents as well as [REDACTED] resume. The Commission found that because it could not verify [REDACTED] [REDACTED]'s work experience, it could not determine whether they had the required minimum of three-years of related practical work experience as required.
- CPI must demonstrate that faculty and educational administrators engage in ongoing faculty assessment and professional development activities that: are appropriate to the size and scope of the school's educational programs; support the quality of education provided; and enhance student learning and achievement. These professional development activities should include elements such as continuing education in the subject area(s) taught; teaching skill development; instructional methodology development; membership in trade and professional organizations as appropriate; and other elements appropriate for the ongoing professional development of faculty. The school is required to document the implementation of these professional development activities for its faculty (*Section III (A)(2), Substantive Standards, Standards of Accreditation*). As noted, the team could not verify the ongoing professional development of the above identified instructors due to missing documentation. In response to the June 3, 2020 OER, CPI submitted a list of professional conferences and professional development attended by its instructors over the

last twelve months. In reviewing the list, the Commission noted that the above mentioned instructors cited were not listed as present at the trainings provided and that the professional development contained in their personnel reports was not reflected in the list of conferences and development though it fell within the same timeframe and so their participation in ongoing professional development could not be determined.

In order to afford CPI an additional opportunity to provide documentation of its compliance with accrediting standards regarding faculty recordkeeping, the Commission decided that additional monitoring was required. Accordingly, the Commission directs CPI to submit the following:

- a. Documentation to demonstrate that [REDACTED] possess appropriate years of related practical work experience in the subject area taught, including evidence that the school has verified that prior work experience or
- b. If any of these faculty have been removed from the schedule, provide the qualifications for the instructor or instructors who are currently teaching those subjects, including completed Faculty Personnel Reports, available at www.accsc.org.

12. CPI must demonstrate compliance with Program Advisory Committee (“PAC”) requirements as outlined below:

- CPI must demonstrate that at least two regularly scheduled meetings are conducted annually, and that written and detailed minutes of each meeting are maintained that include a comprehensive and clear description of the review of and commentary made by the school representatives and the PAC members (*Section II (A)(6)(c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CPI did not appear to hold PAC meetings for approved programs during extended periods when those programs lack actively enrolled students and that the level of detail contained in PAC minutes was inconsistent and in the case of programs where a single PAC reviews multiple programs, inadequate. Additionally, the team noted that the level of detail regarding the schools consideration of PAC feedback and recommendations was also inconsistent. In CPI’s response to the June 3, 2020 OER, CPI submitted 17 sets of PAC minutes. The Commission noted that minutes for the Masonry (Diploma), Solar Photovoltaic Technician/Installer (Diploma), and Wastewater Utility Operator (Diploma) programs were not provided. Though the school provided evidence that the Masonry (Diploma) program was discontinued, PAC minutes for all other programs are needed to show that meetings are conducted consistently. Additionally, the Commission found that similar to the team’s findings, the level of detail and attribution between sets of minutes is inconsistent and the Commission could not determine that there exists a comprehensive and clear description of the review of and commentary made by school representatives and PAC members for all programs.
- CPI must demonstrate that Program Advisory Committee activities include at least annual review and comment of established curriculum of the program and (including academic general education or applied general education as appropriate) (*Section II (A)(6)(d)(i), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the PAC minutes CPI provided did not clearly identify any member qualified to review the school’s general education courses or reflect any clear discussion of the general education components of the programs offered. In response to the June 3, 2020 OER, CPI provided copies of minutes. As noted in above, minutes for all programs were not provided and there is not detailed attribution in each program that is sufficient to determine which PAC members commented on and reviewed curriculum.

In order to allow CPI an additional opportunity to provide evidence of PAC meetings in compliance with accrediting standards, the Commission decided that additional monitoring was required. Accordingly, the Commission directs the school to submit written and detailed minutes of all PAC meetings held in 2020 that include:

- a. A description of all members in attendance (i.e., titles and affiliations);
 - b. An annotation as to which PAC members represent the employer community;
 - c. The date, time, and location of the meeting(s);
 - d. A comprehensive and clear description of the review of and commentary made by PAC members in compliance with *Section II (A)(6)(d), Substantive Standards, Standards of Accreditation*; and
 - e. Evidence that the school gives consideration to the recommendations of the PAC.
13. CPI must demonstrate that the school has maintained the capacity to offer a program that has not had any enrollments or graduates for one year (*Section IV (F)(2)(a), Rules of Process and Procedure, Standards of Accreditation*). As part of the June 3, 2020 OER, the team requested additional information regarding CPI's capacity to offer its Culinary Arts (Diploma), Healthcare Management (AST), Masonry (Diploma), and Natural Gas Compressor Technician (Diploma) programs. In response, CPI submitted Notice of Discontinued Programs for both the Masonry (Diploma) and Natural Gas Compressor Technician (Diploma) and provided evidence of capacity for the Culinary Arts (Diploma) and Healthcare Management (AST) programs. In reviewing the evidence of capacity submitted for the Healthcare Management (AST) programs, the Commission noted that CPI did not offer a high school version of the program, as it does with Culinary Arts. Additionally, CPI noted that it was currently recruiting faculty and adjuncts for the program.

As such, the Commission remains interested in determining CPI's ongoing capacity to offer the Healthcare Management (AST) program as the school failed to submit any evidence of curriculum or learning resource system capacity for this program. Accordingly, the Commission directs the school to submit the following:

- a. An explanation as to the current status of the Healthcare Management (AST) program;
- b. An explanation, as applicable, as to why the school believes, it has the continued capacity and learning resources to offer effectively and successfully the Healthcare Management (AST) program;
- c. Supporting evidence to show CPI's capacity to offer the curriculum for the Healthcare Management (AST) program; and
- d. Supporting evidence to show CPI's capacity to offer learning resource system support for the Healthcare Management (AST) program.

Warning Restrictions:

Pursuant to *Section VII (K)(9), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

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)(8) 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.

CPI 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.³ 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.

CPI 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 January 8, 2021**. If a response, the required fee,⁴ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before January 8, 2021**, 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.

³ ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

⁴ ACCSC assesses a \$500 processing fee to a school placed on Warning.

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

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director