



Accrediting Commission of Career Schools and Colleges

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October 8, 2020

ELECTRONIC DELIVERY

[Redacted]

[Redacted]
Trigram Education Partners, LLC
545 Long Wharf Drive, 5th Floor
New Haven, CT 06511

Warning

- Harris School of Business, Voorhees, New Jersey (School #M001524)¹
- Harris School of Business, Upper Darby, Pennsylvania (School #B072801)
- Harris School of Business, Dover, Delaware (School #B070709)
- Branford Hall Career Institute, Parsippany, New Jersey (School #M000360)
- Branford Hall Career Institute, Jersey City, New Jersey (School #B056051)

Dear [Redacted]

At its September 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered a response filed by Trigram Education Partners, LLC (“Trigram”) to ACCSC’s August 15, 2020 letter which noted that the United States Department of Education (“the Department”) determined that the schools owned and operated² by Trigram to be no longer eligible to participate in the student financial assistance programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. Upon a review of the record in this matter, the Commission voted to place the ACCSC accredited schools owned and operated by Trigram on **Warning**. Furthermore, under *Section IV (F)(2)(f), Rules of Process and Procedure, Standards of Accreditation*, the Commission has the authority to require a school to submit a [Teach-Out Agreement Approval Form](#) when ACCSC deems it to be appropriate. Given the lack of clarity that remains regarding the schools’ financial soundness, and the fact that as of the date of this letter, the schools owned and operated by Trigram continue to be ineligible to participate in the Title IV loan program, the Commission determined that the submission of teach-out agreements for each school listed above to be appropriate. The reasons for the Commission’s concern and the requirements for Trigram to address in response to this Warning letter are below.

[Redacted]

[Redacted]

¹ The Commission is holding in abeyance its decisions from the August 2020 meeting regarding Harris School of Business-Voorhees and Harris School of Business-Upper Darby until the resolution of this matter.

² At the June 2020 meeting, ACCSC approved of the Applications for a Change of Control-Part I that proposed a new ownership structure for the above referenced schools, formerly owned and operated by Premier Education Group (“PEG”). The Commission’s June 18, 2020 informed the schools that the institutions’ compliance with accrediting standards under new ownership would be monitored by ACCSC throughout the change of control process.

- [REDACTED]

- [REDACTED]

- [REDACTED]

- [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Based on the foregoing, Trigram has not given the Commission confidence that the new ownership has the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards as required by *Section I (A)(1)(a), Substantive Standards, Standards of Accreditation* given that several

months after the transaction, Trigram continues to fail to demonstrate compliance with accrediting standards regarding the requirements to effectuate a change of control. Accordingly, the Commission directs Trigram to submit the following:

- a. Copies of all correspondence from the Department regarding this matter since September 1, 2020, to include an explanation regarding the current Title IV eligibility status of each school;
- b. A completed [Teach Out Agreement Approval Form](#), uploaded to ACCSC's [College 360 Portal](#), for each of the following:
 - Harris School of Business, Voorhees, New Jersey (School #M001524);
 - Harris School of Business, Dover, Delaware (School #B070709);
 - Harris School of Business, Upper Darby, Pennsylvania (School #B072801);
 - Branford Hall Career Institute, Parsippany, New Jersey (School #M000360); and
 - Branford Hall Career Institute, Jersey City, New Jersey (School #B056051);
- c. The audited same-day balance sheet as required by the Application for a Change of Control-Part II (Item #3) (this must include the estimated outstanding unearned tuition as of the date of the sale of the school);
- d. An interim audited balance sheet covering the period from the date the transaction closed to October 31, 2020 prepared in accordance with ACCSC's Instructions for the Submission of Financial Statements and Related Information;
- e. A Management Discussion and Analysis narrative examining and explaining the schools' current financial condition;
- f. A pro forma balance sheet reflecting the expected financial condition of **each school** as of January 1, 2021 that minimally breaks down current assets, fixed assets, other assets (if appropriate), current liabilities, long-term liabilities, and equity;
- g. A comprehensive explanation, as to why Trigram believes it has the experience and ability to lead and manage post-secondary educational institutions in compliance with ACCSC's requirements despite Trigram failures to date to effectuate the change of control process in accordance with accrediting standards and federal requirements; and
- h. A signed statement from each schools' designated official attesting that the school has notified/is notifying current and prospective students in writing of the Warning with a summary of the reasons for the Warning along with a copy of the written notification used.

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.

Trigram 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. In accordance with *Section VII (K)(8), Rules of Process and Procedure, Standards of Accreditation*, the Commission requires each school subject to the Warning 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.

Trigram 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 December 1, 2020**. 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 December 1, 2020**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

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

Sincerely,

[REDACTED]
Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]

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. Therefore, Trigram must submit \$2500 in processing fees, \$500 for each ACCSC-accredited institution.