



Accrediting Commission of Career Schools and Colleges

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October 1, 2020

ELECTRONIC DELIVERY

[REDACTED]
[REDACTED]
Vista College
300 North Coit Road, Suite 300
Richardson, Texas 75080

School #M055898
Warning

Dear [REDACTED]

At the August 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decisions to defer final action on the Application for Renewal of Accreditation, Applications for an Academic Associate Degree for the Logistic and Operations Management and Business Administration Leadership programs, and an Outcomes Report submitted by Vista College located in Richardson, Texas. Upon review of the January 28, 2020 Commission letter and the school’s response, and in conjunction with its prior reviews of these matters, the Commission voted to place Vista College on **Warning and to direct the school to cap/limit enrollment in all current program offerings** with a subsequent review scheduled for ACCSC’s May 2021 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commission’s Review

Outcomes Reporting History

- At the May 2015 Meeting, the Commission granted Vista College Renewal of Accreditation for four years going forward from November 2014 and accepted the school’s report for the Business Management (BS) program. At that time, the Commission placed Vista College on Management Retention Reporting, Outcomes Reporting, and Admissions Reporting.
- At the March 2016 meeting, the Commission approved substantive program modifications to 11 of the school’s programs: Criminal Justice – DE (AAS), Information Systems and Security Assurance – DE (AAS), Information Technology – DE (AAS), Medical Insurance Billing and Coding – DE (AAS), Paralegal – DE (AAS), Business Administration – DE (AAS), Business Administration – DE (BS), Project Management – DE (BS), Medical Insurance Billing and Coding – DE (Diploma), Information Technology – DE (Diploma), and Business Administration – DE (Diploma). As part of this approval, the school taught out its existing programs and the Commission began tracking student achievement outcomes in the revised program offerings.
- At the June 2016 meeting, the Commission reviewed and accepted the school’s Admissions Report and continued Vista College on Management Retention Reporting and Outcomes Reporting.
- At the May 2017 meeting, the Commission deferred final action on its review of the school’s student achievement outcomes and management and administrative capacity
- At the February 2018 meeting, the Commission accepted the school’s Management Report and deferred action on the Outcomes Report and new non-degree and degree programs and forwarded the matter to the on-site evaluation team for review in conjunction with the school’s evaluation for Renewal of Accreditation.

The Commission's continued review of these matters throughout the renewal of accreditation process is detailed in the May 2019, November 2019, and August 2020 meeting information below.

May 2019 Meeting

At the May 2019 meeting, the Commission reviewed the findings from the November 15-16, 2018 on-site evaluation. The on-site evaluation report includes three findings regarding student achievement rates, admissions requirements, and refunds. Upon review of the information provided by the school in response to that report, the Commission voted to defer action until the November 2019 meeting and requested that Vista College submit additional information about student achievement and admissions in order to demonstrate compliance with accrediting standards.

November 2019 Meeting

At the November 2019 meeting, the Commission considered its previous decision to defer final action on the Application for Renewal of Accreditation and Applications for an Academic Associate Degree for the Logistic and Operations Management and Business Administration Leadership programs. Upon review of the information provided by the school regarding student achievement and admissions, the Commission found that only one of the school's programs met student achievement benchmarks as of the July 2019 Report Date. In addition, the Commission found that it remained unclear whether or not Vista College was allowing students to start class prior to full execution of the enrollment agreement. Therefore, the Commission again deferred final action on these matters and required Vista College to submit an additional response regarding these student achievement and admissions issues.

August 2020 Meeting

At the August 2020 meeting, the Commission reviewed Vista College's July 6, 2020 response regarding below-benchmark student achievement rates and the school's process for ensuring that students meet admissions requirements prior to enrollment. Upon review of the information provided by the school, the Commission concerned that Vista College continues to have significant, unresolved items in the areas of student achievement and admissions heightened. The areas of the Commission's continued concerns and the requirements for the school's response to those concerns is detailed below.

1. Vista College must demonstrate successful student achievement through acceptable rates of student graduation and graduate employment in the career fields for which the school provides education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the Commission's January 28, 2020 deferral letter, Vista College provided detailed retention data for the school's programs along with graduation and employment data as summarized in the chart below. As shown in the chart, Vista College continues to fall short of meeting student achievement benchmarks across its programs.

Program (Length in Months)	Credential	Grad/ Empl	July 2018 Report Date	July 2019 Report Date	June 2020 Report Date	ACCSC Benchmark Rates	Program Status
Business Administration and Leadership-DE (15)	Diploma	G	No Reportable Data	42%	37%	50%	Teaching Out
		E	No Reportable Data	80%	75%	70%	
Medical Administrative Assistant-DE (15)	Diploma	G	No Reportable Data	No Reportable Data	17%*	50%	Teaching Out
		E	No Reportable Data	No Reportable Data	0%*	70%	
Medical Administrative Assistant – DE (16)	AAS	G	No Reportable Data	No Reportable Data	No Reportable Data	47%	
		E	No Reportable Data	No Reportable Data	No Reportable Data	70%	
Medical Insurance Billing and Coding-DE (17)	Diploma	G	No Reportable Data	43%	50%	47%	Teaching Out
		E	No Reportable Data	14%	35%	70%	
Business Administration and Leadership-DE (18)	AAS	G	No Reportable Data	No Reportable Data	No Reportable Data	47%	
		E	No Reportable Data	No Reportable Data	No Reportable Data	70%	
Criminal Justice-DE (24)	AAS	G	No Reportable Data	37%	38%	47%	Teaching Out
		E	No Reportable Data	64%	45%	70%	
Logistic and Operations Management-DE (24)	AAS	G	No Reportable Data	No Reportable Data	No Reportable Data	47%	
		E	No Reportable Data	No Reportable Data	No Reportable Data	70%	
Medical Insurance Billing and Coding-DE (24)	AAS	G	No Reportable Data	45%	55%	47%	
		E	No Reportable Data	50%	33%	70%	
Business Administration – DE	AAS	G	No Reportable Data	22%	36%	47%	Teaching Out
		E	No Reportable Data	75%	69%	70%	
Business Administration-DE (48)	BS	G	No Reportable Data	No Reportable Data	No Reportable Data	40%	
		E	No Reportable Data	No Reportable Data	No Reportable Data	70%	
Business Management – DE (34)	BS	G	No Reportable Data	No Reportable Data	26%	40%	
		E	No Reportable Data	No Reportable Data	87%	70%	
Healthcare Administration-DE (48)	BS	G	No Reportable Data	No Reportable Data	No Reportable Data	40%	
		E	No Reportable Data	No Reportable Data	No Reportable Data	70%	

* There are discrepancies between the student achievement data listed on the Graduation and Employment (“G&E”) Chart and within the school’s narrative response. Where there is a discrepancy, the data in this chart matches the G&E Chart submitted by the school.

The Commission found that for **all** of the school’s programs with reportable data, Vista College reported graduation and/or employment rates as highlighted above that fall below ACCSC’s student achievement benchmark rate(s).¹ In the July 6, 2020 response, Vista College provided information regarding the school’s continued efforts to address the issue of below-benchmark student achievement. Specifically, the school is

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

implementing leadership changes; conducting a rigorous assessment of programs and credentials to determine how to serve students and employers; redesigning curricula; enhancing student advising; and teaching out diploma programs to focus on associate-level programs. In addition, Vista College provided retention data as directed by the Commission which shows improved retention in some programs and decreased retention in others.

As noted above, Vista College previously discontinued several programs with low student achievement rates and re-launched those programs with revised curricula and class schedules aimed to promote student retention. Although it is clear that Vista College understands the importance of improving its student achievement outcomes, it appears that the school's main plan for doing so is to repeat the past strategy of revising/modifying its program content as a means to "reset" the reporting of student achievement data. As shown by the data in the chart above, Vista College's prior efforts to revise and re-launch programs did not appear to resolve the school's student achievement issues. Despite Vista College's efforts to identify and address the root causes of these below-benchmark student achievement rates, the school has failed to raise the programs' student achievement rates to acceptable levels thereby also failing to show that the school's programs are meeting student needs and adequately preparing students for sustainable employment in the field of study.

Given the school's history of reporting below-benchmark student achievement across its programs, and especially considering the fact that as of the June 2020 Report Date, the graduation and employment rates across the school's programs continue to fall below benchmark, the Commission concluded that Vista College has neither provided sufficient evidence of a cogent solution to this ongoing compliance issue nor demonstrated that the school can operate its programs in compliance with standards in a sustainable manner. The Commission recognized the school's efforts to enhance student achievement; however, the Commission cannot overlook that the school has continually reported below benchmark graduation/employment rates across its programs. The Commission found that despite its formal monitoring of the reported rates of student achievement and concordant institutional actions, and the school's formal reporting on its continual efforts to enhance and support student achievement, Vista College has been unable to demonstrate a level of improvement that would bring the program's rates of student achievement to a minimally acceptable level as required by accrediting standards.

The Commission concluded that it is the school's responsibility to ensure that its programs meet the specific needs of its students in terms of content, delivery methods, support services, and preparation for employment. Vista College must seriously consider whether the school can offer its distance education programs in a manner that will translate to successful student achievement for the student population served by the school.

While the Commission has opted to afford Vista College an additional opportunity to demonstrate improved student achievement outcomes, the Commission has also concluded that Vista College must focus its efforts on its success strategies. Given that many of the school's programs have required continuous outcomes monitoring since May 2015 and that several programs – Business Administration and Leadership-DE (Diploma), Criminal Justice-DE (AAS), and Medical Insurance Billing and Coding-DE (AAS) – have shown a *decrease* in student achievement outcomes with the most recent report, the Commission directs the school to **cap enrollment in all of its active programs effective as of the date of this letter** which will allow the school to focus on the current students and support graduation and employment. As such, the Commission hereby **directs Vista College to immediately limit/cap enrollments for all program offerings to not exceed an enrolled population of 60 students per program at any time, until further notice** (*Section VII (R), Rules of Process and Procedure, Standards of Accreditation*). These program-level actions are meant to allow the school to focus on the strategies and policy changes described in the school's

response to improve graduate employment for the current student population. Through these actions, it is the Commission’s intention to give Vista College ample opportunity to demonstrate improvement.

In addition, the Commission directs the school to submit the following:

- a. The school’s student achievement improvement plan for **each** program 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 each program’s 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.
- d. A three-year trend analysis for student achievement outcomes in each program as submitted in the ACCSC Annual Report. If data for three years is not available, please submit data for as many years as is afforded by the Commission’s Graduation and Employment Chart reporting formula using the following format.

Program Name (Credential)	Length In Months	Graduation / Employment	July 2018 Report Date	July 2019 Report Date	July 2020 Report Date
		G			
		E			
		G			
		E			
		G			
		E			

- e. Minutes from all Program Name Program Advisory Committee (“PAC”) meetings hosted in 2020 that include:
 - i. The date, time, location, and attendance of each meeting (please denote which attendees represent the employment community);
 - ii. A comprehensive and clear description of the review of and commentary made by each of the school’s PAC;
 - iii. The PAC review and commentary regarding student achievement outcomes.
- f. A Program Viability Study for **each** of the school’s programs that specifically includes:
 - i. Both internal and external review and validation of the program content and objectives;
 - ii. An analysis of the school’s student support services;
 - iii. An analysis as to whether the school’s program offerings adequately prepare students for employment; and

- iv. An analysis of the availability of job opportunities for the school’s graduates.
- g. An ACCSC Retention Chart² for **each** program offered at the school using a **March 2021 Report Date** along with an analysis of the effectiveness of the school’s student retention efforts.
- h. A Graduation and Employment Chart for **each** program using a **March 2021 Report Date**.
- j. Summary information for **each** Graduation and Employment Charts 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 field³ (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Employer, Contact, Address, & Ph. #	Date of Initial Employment	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:

Count	Graduate ID	Program	Start 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	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						

- k. 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.

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.

2. Vista College must demonstrate that, prior to enrollment, the school determines that an applicant meets the school's admissions requirements (*Section V(A)(4)(a), Substantive Standards, Standards of Accreditation*). In response to the Commission's request for documentation to demonstrate that the school is securing all necessary documentation prior to fully executing the enrollment agreement and allowing a student to start class in the Criminal Justice-DE (AAS) program, Vista College provided a list of students enrolled in this program between January 1, 2020 and February 28, 2020 along with the admissions documentation secured by the school prior to enrollment. Upon review of the information provided, the Commission found that it appears that in 4 (four) out of 9 (nine) students, the enrollment agreements were signed prior to securing the background checks for these students. Therefore, the Commission again found, after multiple reviews, that Vista College continues to be inconsistent in following its procedures to ensure that all admissions documentation is secured prior to enrolling and starting students.

Based on the foregoing, Vista College must submit the following:

- a. An explanation as to why, after multiple Commission level reviews that date back several meetings and corresponding guidance, Vista College continues to be inconsistent in following its established admissions procedures for the Criminal Justice-DE (AAS) program;
- b. A list of students enrolled in the Criminal Justice-DE (AAS) program between July 1, 2020 and December 31, 2020 along with copies of the admissions documentation secured by the school prior to fully executing the enrollment agreement and allowing the student to start class;
- c. If applicable, an explanation as to why the school allowed a student to start the program prior to securing all necessary documentation for any student reported in (b.) above; and
- d. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards.

Due to the school's history of reporting below-benchmark student achievement outcomes coupled with the outstanding item of concern with regard to the school's admissions procedures, continued failure to demonstrate compliance will likely result in an escalation of action to Probation status. Therefore, it is of utmost importance that Vista College make every effort to demonstrate compliance in these areas in response to this Warning action.

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.

Vista College 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.⁵ 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.

Vista College 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 4, 2021**. If a response, the required fee,⁶ and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before March 4, 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.

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

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

⁵ 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.

⁶ ACCSC assesses a \$500 processing fee to a school placed on Warning.