



Accrediting Commission of Career Schools and Colleges

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May 25, 2021

ELECTRONIC DELIVERY

██████████
Director
Institute of Professional Careers
4448 South Eastern Avenue
Las Vegas, Nevada 89119

School #M070756
Continued Probation

Dear ██████████

At the May 2021 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place Institute of Professional Careers (“IPC”) located in Las Vegas, Nevada on Probation in conjunction with IPC’s Application for Renewal of Accreditation. Upon review of the Commission’s March 10, 2021 letter and IPC’s response, the Commission voted to Continue IPC on Probation with a subsequent review scheduled for ACCSC’s **August 2021** meeting. The reasons for the Commission’s decision are set forth below.

History of the Commission’s Review:

November 2019 Commission Review and Action

At the November 2019 meeting, the Commission considered the Application for Renewal of Accreditation submitted by IPC. Upon review of the August 2019 On-Site Evaluation Report (“OER”) and IPC’s response to that report, the Commission voted to defer final action on IPC’s Application for Renewal of Accreditation until the February 2020 meeting in order to provide IPC with an additional opportunity to demonstrate compliance with accrediting standards. At that time, the Commission informed IPC of its concerns in the areas of Program Advisory Committee; learning resources; enrollment agreement; leave of absence; admissions requirements; records of initial employment; catalog; and fiscal condition and budget. However, regardless of the areas of concern outlined above, the Commission first needed to ascertain whether IPC is eligible for a grant of accreditation under *Section I (D)(4)(d), Rules of Process and Procedure, Standards of Accreditation* and was in continuous operation as “a school” before following up on the other compliance matters. Specifically, the Commission directed IPC to demonstrate that it is operating as “a school” and not more simply, as a training entity for its own employees.

February 2020 Commission Meeting

At the February 2020 meeting, the Commission considered its previous decision to defer action on the Application for Renewal of Accreditation submitted by IPC. Upon review of the Commission’s December 5, 2019 deferral letter¹ and IPC’s responses;² the August 20, 2019 On-Site Evaluation Report (“OER”) and IPC’s response to that report; the Commission voted to defer final action on IPC’s Application for Renewal of Accreditation until the **November 2020** meeting in order to provide IPC with an additional opportunity to demonstrate compliance with accrediting standards in the following areas:

1. The Commission required IPC to demonstrate that it is in fact operating as a school providing education and training to students continuously³ in accordance with its primary objectives, and is maintaining its

¹ As stated in the December 5, 2019 letter the Commission first attempted to ascertain whether IPC is eligible for a grant of accreditation before following up on the other areas that were the basis of the deferral in the areas of Program Advisory Committee; learning resources; enrollment agreement; leave of absence; admissions requirements; records of initial employment; catalog; and fiscal condition and budget. However, after reviewing IPC’s response the Commission determined that additional information is needed.

² IPC submitted a supplemental response on January 30, 2020.

³ With the exception of any regularly scheduled breaks, vacation periods, or approved changes of location.

ability to and meet its obligations to students on a continuous basis (*Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*).⁴ As part of its response, IPC asserted that IPC is more than merely a training entity for its own employees, “because the employees of Abbey Dental work for [REDACTED] and the employees of IPC work for [REDACTED]. These two entities have two different owners.”

2. The Commission required IPC to demonstrate that each Program Advisory Committee (“PAC”) is comprised of appropriately qualified representatives external to the institution who can provide a meaningful review of IPC’s programs and supporting resources and materials (*Section II (A)(6), Substantive Standards, Standards of Accreditation*) and that PAC meetings include at least three members in attendance that represent the employment community and/or practitioners from the program area (*Section II (A)(6)(a), Substantive Standards, Standards of Accreditation*).
3. The Commission required IPC to demonstrate that it integrates use of the learning resource system materials into the curriculum and program requirements as a mechanism to enhance the educational process and to facilitate positive learning outcomes for students (*Section II (A)(7)(b), Substantive Standards, Standards of Accreditation*).
4. The Commission required IPC to demonstrate that it executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*).
5. The Commission required IPC to demonstrate that it enforces the leave of absence (“LOA”) policy as published in its catalog (*Section VII (A)(3)(b-c), Substantive Standards, Standards of Accreditation*).
6. The Commission required IPC to demonstrate that prior to enrollment it determines that an applicant meets its admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*).
7. The Commission required IPC to demonstrate that it maintains verifiable records of each graduate’s employment (*Section VI (C)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found of the two graduates reported in the 2018 Annual Report as employed in field, IPC did not have internal documentation verifying that employment. It appears that IPC personnel incorrectly understood the results of the independent third party to be sufficient documentation. The May 27, 2020 deferral letter informed IPC that:

The role of the independent third party required by ACCSC is to verify the school’s documentation, not to provide it to the school. If the school chooses to use a third party to verify the employment of its graduates, then that third party’s work would have to be independently verified by a separate qualified third party for the renewal of accreditation process.

8. The Commission required IPC to demonstrate that it publishes a catalog that accurately portrays IPC and its policies and procedures (*Section IV(C)(1)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that numerous policies and procedures identified in the catalog include instructions and/or procedures that refer to an Executive Director. IPC’s management does not include an Executive Director, making it unclear how the student should proceed when needing to follow policies such as: transfer-of-credit, attendance, leave of absence, make-up work, satisfactory progress, and student services.

⁴ As defined in *Section I (A)(10) Rules of Process and Procedure, Standards of Accreditation*, “continuous operation” means operation under continuous licensure by the state and training students at a school except for regularly scheduled breaks and vacation periods and such operation must be ongoing. The Commission purposely deferred action to the November 2020 meeting in order to allow IPC to demonstrate it is a viable “school” through new student enrollment(s).

9. The Commission required IPC to demonstrate that it prepares a financial budget for each fiscal year that allocates working capital for expenditures required to ensure the proper operation of IPC and the discharge of its obligations to students as well as for institutional improvement and faculty development activities. The Commission required IPC to show that it monitors its budgetary projections in relation to actual income and expenses on a regular basis throughout the fiscal year (*Section I (C)(2), Substantive Standards, Standards of Accreditation*). As part of the response to the August 20, 2019 OER, IPC provided a copy of the 2019 Annual Budget to demonstrate specific funding for the Learning Resource System. In reviewing the budget, the Commission questioned whether IPC derives its revenue from “school” business or outside sources along with the expenditures related to “school” business including the allotted amounts for several of the line items.

November 2020 Commission Review and Action:

At the November 2020 meeting, the Commission considered the September 18, 2020 letter submitted on behalf of IPC requesting that the Commission grant IPC an extension to respond to the Commission’s May 27, 2020 deferral letter. As stated in the December 4, 2020 letter, the Commission voted to deny the extension request and directed IPC to respond to all deferral items for review at the **February 2021 meeting**. Moreover, IPC’s request raised additional questions about its management and administrative capacity (*Section I (A)(1) Substantive Standards, Standards of Accreditation*). Therefore, in addition to all items in the May 27, 2020 deferral letter, the Commission directed IPC to submit additional information regarding its management.

February 2021 Commission Meeting Review and Action:⁵

At the February 2021 meeting, the Commission considered its previous actions and reviewed the information provided by IPC and voted to place IPC on Probation due to concerns regarding IPC’s operations and status as are set forth below.

1. The Commission determined that IPC has failed to show that it has operated primarily as a “school” and that it meets ACCSC’s eligibility criteria. Specifically, *Section I (C)(1) Rules of Process and Procedure, Standards of Accreditation* states that a school’s primary educational objective must be to prepare students for entrance or advancement in one or more occupations requiring technical or career oriented competencies and skills. IPC’s documentation shows that IPC’s consulting services are the larger part of IPC’s operations than that of any career oriented educational program. Also, the information submitted by IPC shows that IPC has not been primarily focused on successfully offering its Dental Assistant program but rather is awaiting approval from the state of Nevada for a new program in Dental Therapy.

Upon review of IPC’s 2019 budget at the February 2020 Commission meeting, the Commission questioned whether IPC derives its revenue from school business or outside sources as stated in the history above (see the May 27, 2020 deferral letter). The Commission noted that the budget showed revenue of \$ [REDACTED] or 77% of the projected revenue, comes from “Consulting & Managerial Fees;” and expenses of [REDACTED] for “Salaries and Wages” which was smaller than “Other Professional Fees” at \$ [REDACTED]. The Commission directed IPC to submit a copy of its budget policies and procedures; financial budget that consists of an estimation of the revenue and expenses for the 2020 fiscal year; a budget to actual analysis for the period January 1, 2019 through December 31, 2019; and any additional

⁵ The Commission has concerns that remain unresolved in the following areas listed in the May 27, 2020 deferral letter: continuous operation, Program Advisory Committee; enrollment agreement; leave of absence; admissions requirements; and records of initial employment. Since there are no students currently enrolled with IPC and IPC has not enrolled a new student since April 2019 (which as stated in its response is due to COVID-19), with no documentation of remedies provided by IPC, those areas are yet unresolved.

information IPC believes will be useful to the Commission in making a determination regarding compliance with accrediting standards in this regard.

In response, IPC stated the following:

The Institute prepares an annual budget and monitors this budget in relation to actual income and expenses on a regular basis throughout the year. The Institute's owner prepares this budget at the beginning of each fiscal year. The budget is based on prior experiences and historical operating results, student enrollment projections, and expected school investments.

IPC also submitted a 2020 budget that again shows tuition to be only a small portion of its revenue as compared to "Consulting & Managerial Fees." The budget lists tuition revenues in the amount of \$██████; Student Services \$██████; and Consulting & Managerial Fee revenue as \$██████. This information indicates that IPC is primarily engaged in consulting services.

IPC also provided December 31, 2019 and 2018 Audited Financial Statements. The balance sheet for the consolidated financial statements shows no tuition receivable as of December 31, 2019, but does show a receivable in the amount of \$██████ as of December 31, 2019 from Abbey Dental for dental assistant services. The Statements of Income for the Years Ended December 31, 2019 and 2018 lists tuition revenue as \$██████, respectively and revenue from management services income as ██████████ for 2019 and 2018, respectively. The Commission found this to show that IPC is not primarily engaged in educational activities but instead in consulting and management services.

The financial statements also include the following notes:

NOTE 13: RELATED PARTY TRANSACTIONS

Rent Expenses-Related Party

For the years ended December 31, 2019 and 2018, the Institution paid \$██████████ respectively, in rent to Abbey Dental, a company with common ownership as the Institution

Stockholder Note Receivable (Unsecured)

For the years ended December 31, 2019 and 2018 the Institution had an unsecured notes receivable from a related party, Abbey Dental, a company with common ownership as the Institution of \$██████████, respectively [sic].⁶

Stockholder Accounts Receivable (Secured)

For the years ended December 31, 2019 and 2018 the Institution had secured accounts receivable from Abbey Dental, a company with common ownership as the Institution, in the amount of \$██████████, respectively.

Management Services Income

⁶ In the May 27, 2020 deferral letter, the Commission had questioned how Abbey Dental employees can be considered external to the institution as required by Program Advisory Committee ("PAC") standards. IPC's response asserts there is separate ownership; however, these financial statements indicate there is common ownership. In addition, IPC stated that it held no PAC meetings in 2020, as required. ACCSC's COVID-19 Guidance for ACCSC-Accredited Schools issued May 27, 2020 and Updated December 21, 2020 announced that the Commission allowed schools to hold PAC meetings for each program or group of related programs via virtual meeting technologies for all PAC meetings held in 2020 and 2021. The guidance stated that PAC(s) should still review all items set forth in Section II (A)(6), *Substantive Standards, Standards of Accreditation*, however, the physical review of equipment and facilities may be done virtually. Therefore, the Commission's concerns regarding PACs and management are unresolved.

For the years ended December 31, 2019 and 2018, the Institution received ██████████ \$█████████ in management services income from Abbey Dental for work performed related to providing dental assistant and office manager work.

Accounts Receivable Related Party – Secured

As of December 31, 2019 and 2018 the Institution had a secured related party accounts receivable from Abbey Dental in the amount of ██████████, respectively. This receivable is for a service contract that the Institution has with Abbey Dental to provide dental assistant services.

This information also demonstrates that IPC’s “Management Services” – work performed related to providing “dental assistant and office manager work” and “dental assistant services” – are its primary focus, as the Income (██████████) from these services make up most of the total revenue in the amounts of \$██████████ for 2019 and 2018, respectively.

In addition, the Commission considered evidence that IPC is not engaged in offering its only approved program – Dental Assistant – but instead is focused on offering a program for which it has no approval either from the state of Nevada or ACCSC. Upon review of IPC’s October 2019 Staff Meeting minutes which were submitted in an effort to show that IPC gives consideration to Program Advisory Committee (“PAC”) input, the Commission noted that IPC is not implementing recommendations from the PAC, not for reasons due to the best interest of the program or students but because of financial aid eligibility and because IPC is phasing out the program. The minutes state the following:

1. Reviewed PAC responses

██████████ went over how pleased the PAC committee was with the program, curriculum, and facility. ██████████ also addressed the recommendation of ██████████ of making the DA program shorter to seem more attractive to prospective students. ██████████ stated that due to the fact we receive financial aid, we have to have a certain amount of clock hours. Also, ██████████ stated being that we are phasing away Dental Assisting; we won’t be changing the program length at this time.

As stated in the August 2019 OER, IPC’s stated mission is “...to shorten the distance between the classroom and career, making a positive difference in the lives of every student who enrolls at IPC and to provide constant support.” IPC’s PAC member, ██████████ (owner of five practices called ██████████) who is a member not associated with Abbey Dental is recommending that IPC shorten the program which would contribute to IPC’s mission to shorten the time from classroom to career and yet IPC is not making changes.

While the Commission understands that IPC is seeking to expand by “pioneering” the first Dental Therapist program in Nevada, this process is taking years to actualize and in the meantime, IPC does not appear to be focused on its only approved program. IPC’s response to the May 27, 2020 deferral letter indicates that at the time of the ACCSC visit almost two years ago, in April 2019, IPC informed the evaluation team that the Nevada Legislature was considering the bill to allow dental therapists into Nevada. The responses states the following:

[a]fter a few years of opposition by many Nevada dentists, the Nevada Legislature finally passed legislation to legalize dental therapy in 2020. The Nevada Revised Statutes regarding dental therapy became effective in 2020. In December of 2020, the Nevada Dental Board conducted their first workshop on creating the Nevada Administrative Code for dental therapy. The state regulations covering the training and practice of dental therapy are expected to be

completed by July of 2021. The Institute will seek approval to offer a dental therapy training program as soon as Nevada has finalized the applicable regulations.

The Commission understands that schools plan for change, including offering new programs, and that this is an important part of institutional growth and development. However, the evidence here – dwindling enrollment and a shift to “dental assistant and office manager services” – shows that IPC is not primarily focused on offering its only currently approved program and the concordant educational objectives.

The Commission also recognizes and understands that IPC operates out of a working dental office, per IPC’s response to the August 2019 OER, and that as noted in the August 2019 OER, IPC personnel stated that the students who complete the program are often already employees at the dental office and desire to move within the company or are hired at Abbey Dental upon graduation. IPC still must demonstrate that it is a functioning “school” unit whose primary objective is training students and not simply on-the-job training for Abby Dental employees. IPC must be able to distinguish itself from Abbey Dental, as a “school” operating and training students as its primary objective. As further evidence that IPC hasn’t demonstrated it is operating as a school unit, the third-party employment verification summary report submitted by IPC,⁷ shows that one of its employees, ██████████ listed on the IPC organization chart as Admissions Officer, was also the person contacted by MMI, the third party verifier to verify employment on behalf of the employer. ██████████ is listed as the supervisor and “verifier,” “██████████, Call Center Manager” to verify the employment of the two graduates listed on behalf of the employer, “Abbey.” This conflicts with IPC’s response to the December 5, 2019 deferral letter in which it stated that **“the employees of Abbey Dental work for Dr. ██████████ and the employees of IPC work for ██████████ [emphasis added].”** These two entities have two different owners.” This conflicting information does not show these two entities are independent or that IPC is a separate school unit.

For all intents and purposes, it appears that IPC and Abby Dental are one in the same operating under common ownership. It is not the Commission’s practice to accredit work sites, but instead actual school units and entities that operate entirely independently with regard to providing vocational and career-oriented education as the primary objective. IPC has failed to make this showing.

Lastly, IPC’s response regarding PAC requirements further highlights its focus on an unapproved program and lack of focus on its only ACCSC-approved program. Specifically, it appears IPC has not held a PAC meeting to review the Dental Assistant program since October 3, 2019. The response states,

*The Institute had a Program Advisory Committee meeting scheduled for March 26, 2020 at 5pm. However, this meeting was cancelled due to the federal and state emergency declarations made earlier in March 2020. Because of the ongoing federal and state emergency status and the suspension of classes due to COVID-19, there have been no PAC meetings since that time. The Institute will be expecting to make up the two 2020 vacated PAC meetings in 2021. We have set the next PAC meeting for May 12th **which will have an emphasis on the preparation of the new Dental Therapy program [emphasis added].***

Input received from its Program Advisory Committee is an important element in the continued success of students enrolled in the Institute’s dental assisting program. As described above, Abbey Dental employees are an important part of the PAC as they have a history of employing graduates from the Institute. The Institute’s PAC includes practitioners and employers outside

⁷ The Commission directed IPC to submit its internal employment documentation, but IPC incorrectly submitted a third party report from MMI.

of Abbey Dental as well. The Institute uses input from these valuable members of the dental community in evaluating the effectiveness of its curriculum. These two dental practices employ over one hundred dental staff which allows them to share all of their experiences at the PAC meetings and give valuable opinions about the expansion of the Institute's Dental Therapy program.

Per ACCSC's COVID-19 Guidance for ACCSC-Accredited Schools issued May 27, 2020, and Updated December 21, 2020 announced that the Commission allowed schools to hold PAC meetings for each program or group of related programs via **virtual meeting technologies** for all PAC meetings held in 2020 and 2021. The guidance stated that PAC(s) should **still review all items** set forth in *Section II (A)(6), Substantive Standards, Standards of Accreditation*, however, the physical review of equipment and facilities may be done virtually. IPC has held no PAC meetings in 2020 – not even virtual PAC meetings, to review the Dental Assistant program. This highlights that the Dental Assistant program is not IPC's primary objective and instead that IPC is focusing on plans for offering a different program in the future. In fact, IPC stated that the plan for the upcoming meetings mentioned above will focus on the preparation for a new Dental Therapy program for which IPC has no approval.

Based on the foregoing, the Commission found IPC to be out of compliance with eligibility criteria and provided IPC with an opportunity to demonstrate compliance. In the March 10, 2021 Probation letter the Commission directed IPC to demonstrate that it meets ACCSC's eligibility criteria in the area of Educational Objectives. IPC must demonstrate that it is in fact operating as an independent school unit and that its primary educational objective is to prepare students for entrance or advancement in one or more occupations requiring technical or career oriented competencies and skills *Section I (C)(1) Rules of Process and Procedure, Standards of Accreditation*. The Commission's letter indicated that IPC should use the findings and concerns contained in the letter to formulate its response and to demonstrate that IPC is in fact eligible for ACCSC accreditation. IPC must demonstrate that it is operating as a school **and** is training students or is in fact barred from doing so in the state of Nevada.

May 2021 Commission Meeting Review and Action

At the May 2021 meeting the Commission reviewed IPC's April 8, 2021 response to the Commission's March 10, 2021 Probation letter. The Commission found that the response fails to demonstrate that IPC is in fact operating as an independent school unit and that its primary educational objective is to prepare students for entrance or advancement in one or more occupations requiring technical or career oriented competencies and skills *Section I (C)(1) Rules of Process and Procedure, Standards of Accreditation*. IPC also failed to demonstrate that it is operating as a school **and** is training students as is required in order for a school to maintain its eligibility for accreditation, or is in fact barred from doing so in the state of Nevada (*Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*).

The April 8, 2021 response, "Re: Response to Probation Notice Institute of Professional Careers – School #M070756" was written by IPC's attorney [REDACTED], on behalf of IPC. The Commission found the arguments included in [REDACTED] letter to be non-responsive to the questions and information asked of IPC. Overall, [REDACTED] letter failed to in any meaningful way show how IPC in fact meets accreditation standards and ongoing eligibility for accreditation. Instead, IPC appears to have chosen to have its legal counsel allege that ACCSC has misapplied its standards and rules, and as such, the Commission is not in compliance with federal regulations that apply to recognized accreditation agencies. In each instance, IPC's legal counsel has also chosen to interpret for ACCSC and the U.S. Department of Education ("the Department") how to apply their respective requirements. The Commission understands its role and responsibilities for the application of its own standards as well as its responsibilities as a recognized accrediting agency. Contrary to the arguments in [REDACTED] letter, if ACCSC continues to accredit a

“school” that is not operational without students and otherwise ineligible, that is a more likely reason for the Department to question ACCSC’s compliance with federal regulations and continued recognition.⁸ Of primary issue here is that IPC has failed to demonstrate that it has maintained eligibility for accreditation despite being given opportunities to do so. This fact notwithstanding, the Commission determined to give IPC one final opportunity to respond in a way that meets the school’s burden to demonstrate compliance with accreditation standards.⁹

The April 8, 2021 response attempts to make a case that the Commission has incorrectly applied its standards, stating for example that “[o]ther schools accredited by ACCSC have other revenue sources, such as have revenues from clinic operations and product sales. Those schools operate from a clinic environment.” The Commission noted, however, that those “other schools” – entities that are in fact schools – have students enrolled in, attending, and receiving training in ACCSC-approved programs. IPC has yet to make a clear and convincing showing that it is in fact operating as a school training students and as such eligible for ACCSC’s continued accreditation.

In addition, the response requests a reconsideration from the Commission, stating:

IPC requests that the Notice be immediately remanded to the Commission for further evaluation in light of the concerns with the Commission’s application of its own Standards and federal law, and
We urge the Commission to reevaluate the basis for its probation action and to work with IPC in a collaborative manner to ensure that it can remain accredited while it pursues a workforce program offering that is more closely aligned with the needs of the State and students.

The Commission, however, does not consider petitions for reinstatement or petitions for reconsideration (*Section VIII (A)(3) Rules of Process and Procedure, Standards of Accreditation*).¹⁰

As stated above, the Commission found that the response submitted on IPC’s behalf is not responsive to the Commission’s concern and directives and therefore fails to demonstrate compliance with eligibility requirements. The response does not include any information to address the Commission’s findings and does not demonstrate that IPC’s primary educational objective is to prepare students for entrance or advancement in one or more occupations requiring technical or career oriented competencies and skills (*Section I (C)(1) Rules of Process and Procedure, Standards of Accreditation*). Furthermore, the March 10,

⁸ By way of example, the Department initiated a review of another accrediting agency based on information from media coverage alleging that the accreditor accredited Reagan National University, an institution not actually in operation. <https://www.federalregister.gov/documents/2021/02/01/2021-02106/national-advisory-committee-on-institutional-quality-and-integrity-meeting>

⁹ *Section I (F) Rules of Process and Procedure, Standards of Accreditation* states that by applying for initial or renewal of accreditation, a school accepts and agrees to the terms set forth in the ACCSC Application for Accreditation and accepts and agrees that the responsibility rests with the school to demonstrate continuous eligibility for accreditation and compliance with accrediting standards and requirements as set forth in the *Standards of Accreditation*. The burden rests with the school to establish that it is meeting the standards. A school must supply the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards if the school is to maintain accreditation (*Section I (G)(1) Rules of Process and Procedure, Standards of Accreditation*).

¹⁰ IPC’s Application for Renewal of Accreditation signed by [REDACTED] on September 10, 2018 attests to understanding and agreeing to the process including: The school voluntarily submits itself to a periodic review and a reasoned judgment by the Commission as to the school’s qualifications in accordance with the Commission’s *Rules of Process and Procedures* and voluntarily accepts responsibility to comply with the *Standards of Accreditation* and the ACCSC Bylaws; The school accepts the responsibility to demonstrate that the school is meeting the standards and must supply the Commission with complete documentation of the school’s compliance with all accrediting standards and requirements in order to be granted and to maintain accreditation; The school has every opportunity, as part of the accrediting process, to present itself in its best light and to respond to any concerns; The school assumes an obligation to be forthcoming, complete, truthful, and accurate in presenting information to, and answering questions of the Commission; and It is the responsibility of the school to ensure that all submissions to the Commission are complete and represent the school’s efforts to demonstrate compliance with accrediting standards and requirements.

2021 Probation letter directed IPC to demonstrate that IPC is operating as a school **and** is training students or is in fact barred from doing so in the state of Nevada. IPC's response does not demonstrate it is operating as a school providing education and training to students in accordance with its primary objectives, and is maintaining its ability to and meet its obligations to students on a continuous basis¹¹ (*Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*).¹² Lastly, the response does not include any information to demonstrate that IPC is barred from training students by the state of Nevada.

Therefore the Commission voted to continue IPC on Probation and to provide IPC a final opportunity to submit a response to the March 10, 2021 Probation as previously directed. This is IPC's final opportunity demonstrate that it is in fact operating as an independent school unit, that its primary educational objective is to prepare students for entrance or advancement in one or more occupations requiring technical or career oriented competencies and skills (*Section I (C)(1) Rules of Process and Procedure, Standards of Accreditation*), and that IPC is operating as a school training students or is in fact barred from doing so in the state of Nevada (*Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*).

Probation Requirements:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **IPC's failure to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 IPC is on Probation except as described in *Section IV (E)(2)(r)(iv), Rules of Process and Procedure, Standards of Accreditation*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reasons for the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies.

In accordance with *Section VII (L)(7), Rules of Process and Procedure, Standards of Accreditation*, IPC must **within seven days** of receipt inform current and prospective students in writing that IPC has been placed on Probation and state where information regarding that action can be obtained from the Commission's website.

Teach-Out Plan Requirement:

Given the serious nature of the issues outlined herein, the Commission directs IPC to provide an [Institutional Teach Out Plan Approval Form](#), which must be submitted as part of the response for the items listed above.

¹¹ With the exception of any regularly scheduled breaks, vacation periods, or approved changes of location – none of which appear to apply in IPC's case.

¹² The Commission first notified IPC of its questions and concerns regarding the issue of continuous operation in the December 5, 2019 deferral letter, again in the May 27, 2020 deferral letter, and made an inquiry about the status of operations in the March 10, 2021 Probation letter. IPC has had ample notice and opportunity to demonstrate compliance with ACCSC's requirements. As defined in *Section I (A)(10) Rules of Process and Procedure, Standards of Accreditation*, "continuous operation" means operation under continuous licensure by the state and training students at a school except for regularly scheduled breaks and vacation periods and such operation must be ongoing.

Maximum Timeframe to Achieve Compliance:

According to *Section VII (M), Rules of Process and Procedures, Standards of Accreditation*, because the Commission has found an area of non-compliance with accreditation standards or requirements, the maximum timeframe allowed for IPC to achieve and demonstrate compliance with the *Standards of Accreditation* began on March 10, 2021 and ends as of **March 10, 2022**. However, the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances and may establish shorter time frames as deemed appropriate, including taking immediate adverse action. Given the nature of the concerns in this Probation Order pertaining to fundamental eligibility requirements, it is unlikely the Commission will allow the maximum time frame for IPC to demonstrate compliance and more likely that the Commission will take action at its next meeting.

Notification to Students:

IPC must within seven (7) days inform current and prospective students in writing that it has been placed on Probation and that additional information regarding that action can be obtained from the Commission's website (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*).

Response Requirements:

By applying for accreditation, IPC 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 IPC 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 IPC must supply the Commission with complete documentation of its compliance with accrediting standards.

IPC must provide a response to the items expressed above that provides the information requested along with any additional information that it believes supports a demonstration of compliance with accrediting standards.¹³ If IPC'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.

IPC must upload its electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that IPC's password to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a submission can be found [here](#).

Keep in mind, IPC'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). IPC will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

IPC'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 June 25, 2021**. If a response, the required fee,¹⁴ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 25, 2021**, the Commission will consider further appropriate action.

¹³ 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 IPC to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

¹⁴ ACCSC assesses a \$1,000 processing fee for a Probation 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 IPC's director, or designated member of its management team, via e-mail.

For further assistance or additional information you may contact me at mccomis@accsc.org.

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]
[REDACTED]