



Accrediting Commission of Career Schools and Colleges

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March 11, 2021

**ELECTRONIC DELIVERY**

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

*School #M072487*  
*Continued Warning*

Dear ██████████

At the February 2021 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Commission’s previous action to place Central Pennsylvania Institute of Science & Technology (“CPIST”) on **Warning**.<sup>1</sup> Upon review of the Commission’s October 21, 2020 letter and the school’s response, the Commission voted to continue CPIST on Warning with a subsequent review scheduled for ACCSC’s August 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:**

**August 2020**

At the August 2020 meeting, the Commission’s considered the school’s Application for Renewal of Accreditation;

- Degree Program Application;
- Employment Verification Report; and
- Admissions Report.

In reaching the decision to place the school on Warning, the Commission considered the outstanding questions surrounding the school’s compliance with accrediting standards in the following areas:

- Program approval;
- Student achievement;
- Verifiable records of initial employment;
- Submissions in accordance with Commission instructions;
- Advertising;
- Catalogs;
- Refunds;
- Code of Conduct;
- Admissions practices;
- Enrollment Agreements;
- Faculty recordkeeping;
- Program Advisory Committees; and
- Program capacity.

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<sup>1</sup> See Commission letter dated October 21, 2020

## February 2021

In reviewing the Commission’s October 21, 2020 letter and CPIST’s response, the Commission acknowledged CPIST’s work<sup>2</sup> in addressing several of the concerns noted above; however, a number of questions remain regarding the school’s compliance with accrediting standards as explained below. ACCSC encourages CPIST to continue its efforts to resolve the remaining concerns noted below and to focus its efforts on providing documentation that demonstrates the school’s compliance with applicable standards.

1. CPIST 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 Commission’s October 21, 2020 Warning letter, the Commission found that the school reported employment rates for several programs that did not meet ACCSC’s benchmarks. In the school’s response, CPIST provided updated rates with a December 2020 report date.

Program (Credential)	Length in Months	CPIST Graduation Rate	ACCSC Benchmark Graduation Rate	CPIST Employment Rate	ACCSC Benchmark Employment Rate
Carpentry (Diploma)	9	100%	60%	50%	70%
Structural Welding (Diploma)	9	81%	60%	67%	70%

As shown in the chart above, the employment rates for the Carpentry and Structural Welding programs fall below ACCSC’s benchmark rate.

CPIST also submitted copies of its revised admissions requirements and processes and indicated that the school began reviewing and changing program curriculum, created online class resources and implemented flipped learning, and provided additional learning resources to students. CPIST additionally noted that the school intends to hire more staff in career and student services and is focusing on efforts to improve on the school’s enrollment, academic support, and community engagement activities. CPIST further noted the impact of COVID-19 on enrollment and the reported employment rates in general, as well as the specific issues impacting the construction industry. Further, CPIST stated that the school recognizes the need for improvement and expects programs to be at ACCSC’s established benchmarks by October 2022.

In order to afford CPIST with an opportunity to further develop its student achievement support strategies for the Carpentry 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) and Structural Welding (Diploma) programs specifically addressing any enhancements or modifications made in the following areas:

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<sup>2</sup> The Commission understands the school has submitted applications for new programs. The applications are currently under review through the regular substantive change process.

- 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) and Structural Welding (Diploma) programs using a **June 2021 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 field<sup>3</sup> (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 <sup>4</sup> (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				

<sup>3</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

<sup>4</sup> Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

- 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.
2. CPIST 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*). According to ACCSC’s records, the Commission previously noted in the October 21, 2020 Warning letter that a number of CPIST’s graduate records included employment dates prior to the student’s graduation date and 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 the field for which training was provided or in alignment with a majority of the educational and training objectives of the HVAC program.

For example, if a student wanted to pursue a career as a Plumbing Assistant, the student would pursue training in a Plumbing program, not a HVAC program. However, the Commission does realize there can be alignment between these objectives. But in order for the school to classify an HVAC program graduate as employed “in field” when obtaining a job as a “Plumbing Assistant,” the graduate’s employment duties would need to include a majority of the educational objectives taught in the HVAC program.

In response, CPIST submitted justification for its description of graduates employed in field, CPIST’s use of career advancement, along with a chart and supplementary information on recent graduates. In reviewing CPIST’s submission, the Commission noted that CPIST did not submit a narrative regarding how Graduate ID [REDACTED]’s plumbing assistant position was related to the graduate’s education and training in HVAC. Additionally, the Commission noted that CPIST stated that for several graduates, “Heavy Equipment student employment date was entered wrong.”

While the Commission noted CPIST’s work in addressing several of the noted issues, the Commission remains interested in ensuring that CPIST’s records of initial employment are verifiable in light of the acknowledged errors. Accordingly, the Commission determined that further monitoring is warranted and directs the school to submit the following:

- a. A narrative description regarding Graduate [REDACTED] as to how the graduate’s education and training in HVAC relates to the graduate’s employment as a Plumbing Assistant;

Count	Student ID	Program	Start Date	Graduation Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title
1	123457	HVAC Technician	1/10/2018	1/10/2018	HVAC Repair Industries, John Doe, 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2018	HVAC Technician
2	234567	HVAC Technician	1/10/2018	1/10/2018	AC Service, 456 Maple Dr., John Doe, Somewhere, VA 333.444.5678	3/1/2018	HVAC Technician

- b. For each graduate who gained employment between January 1, 2021 and March 31, 2021 provide the following information;
  - 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.
3. CPIST 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*). Previously, in the October 21, 2020 Warning letter, the Commission noted CPIST’s use of the phrases, “state-of-the-art” and “High-paying High Demand Jobs” and the use of the Department of Veterans Affairs logo. In response, CPIST showed evidence that it replaced the phrases with appropriate language and removed the Department of Veterans Affairs logo. The Commission noted the changes, but found additional phrases on CPIST’s website that may lead to a misleading or exaggerated impression with regard to the school’s training:
- Post-secondary Degree Programs website page:
    - “As a result of its impact on economic and workforce development, CPIST is recognized as **one of the finest** post-secondary technical training schools in Pennsylvania today.”
  - Natural Gas Trifold:
    - “Attend a program that is **one of two of its kind** in the United States”

Additionally, the Commission noted CPIST’s use of language indicating whether programs are or are not accredited by ACCSC. The Commission reminds CPIST that ACCSC does not accredit programs but does review and approve programs. Program approval (not program accreditation) is included under the scope of ACCSC’s institutional accreditation. Finally, the Commission noted CPIST’s use of the phrase, “CPIST remains fully accredited by ACCSC” in CPIST’s notice of probation to its students. The Commission reminds CPIST that ACCSC does not provide “partial” accreditation and as such does not permit the term “fully” accredited because it is misleading.

In order to provide CPIST with an additional opportunity to provide documentation that CPIST's advertising meets accrediting standards, the Commission decided that further monitoring was required. Accordingly, the Commission directs the school to submit the following:

- a. Justification for the statement "CPIST is recognized as one of the finest post-secondary technical training schools in Pennsylvania today" using external validation and sources or evidence that the school has removed the statement or evidence that this statement has been removed from all advertising and publications;
  - b. Justification for the statement "Attend a program that is one of two of its kind in the United States" in reference to the Natural Gas program using external validation and sources or evidence that the school has removed the statement" or evidence that this statement has been removed from all advertising and publications; and
  - c. Evidence that the school has removed A description regarding the action taken (i.e. language removed, language revised, et.) by the school to address the language regarding accredited programs and the statement "CPIST remains fully accredited by ACCSC"; or
4. CPIST 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*). Specifically, CPIST'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*). Previously, in the October 21, 2020 Warning letter the Commission noted that while CPIST's catalog contained a list and sequence of courses, the course titles alone did not constitute sufficient detail to serve as course descriptions. In response, CPIST submitted a revised course catalog. In reviewing the course catalog, the Commission noted that the course catalog did not contain course descriptions for Diploma programs but that the sections noted as 'Course Descriptions' instead read as program descriptions. Additionally, the Commission found that the Course Description for the Advanced Manufacturing Technician II Diploma program and the Program Overview for the Advanced Manufacturing Technician AST Degree program were the same. Finally, the Commission found that there was not outline or breakdown of the Heavy Diesel Construction – Case Construction Emphasis and Natural Gas Compression-CAT / Ariel Emphasis programs in the revised course catalog.

In order to give CPIST an additional opportunity to show compliance with Commission standards regarding its catalog, the Commission determined that additional monitoring is warranted. Accordingly, the Commission directs CPIST to submit a complete copy of the school's revised catalog containing adequate and differentiated course descriptions and scope and sequence for each program.

5. CPIST 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*). CPIST must 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, CPIST 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*). In the

October 21, 2020 Warning letter, the Commission requested copies of CPIST’s policies and procedures for training students as ambassadors and tour leaders, Codes of Conduct for those ambassadors and tour leaders, and a demonstration that currently enrolled students were not providing endorsements of CPIST. In response, CPIST submitted a description of the student tour assistant training, a copy of its code of conduct addendum for student tour assistants, and noted that CPIST had no current student tour assistants due to COVID-19. The school’s response notwithstanding, the Commission remains concerned regarding student involvement as tour assistants and is interested in obtaining additional information regarding implementation of the program as implementation occurs.

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

- a. An assessment of the effectiveness of the student tour assistant training and
  - b. Evidence that students acting as ambassadors or tour guides sign the code of conduct.
6. CPIST 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*). In the October 21, 2020 Warning letter, the Commission requested evidence of implementation of CPIST’s updated enrollment agreement process and form. In response, CPIST submitted revised enrollment agreements for student enrollments since August 1, 2020. In reviewing the submitted enrollments agreements, the Commission noted that CPIST did not show clear implementation of the forms as some forms contain handwritten changes without dates or initials indicating who made the change or when the change was made. The Commission further noted that the submitted Student Check Lists on pages 634 to 2109 also contain handwritten corrections without attribution or dating and at times were difficult to determine discrete numbers.

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

- a. A list of students enrolled since January 1, 2021, using the chart below:

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

and

- b. Copies of fully executed enrollment agreements corresponding to each student listed in the chart (a.) above.
7. CPIST must demonstrate compliance with Program Advisory Committee (“PAC”) requirements as outlined below:
- CPIST 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*). In the October 21, 2020 Warning letter, the Commission noted that the level of detail in CPIST’s minutes

was inconsistent and that 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. In response, CPIST submitted minutes from fall and spring 2020 PAC meetings. In reviewing the submitted minutes for fall 2020, the Commission noted that the Advanced Manufacturing Technician II Diploma program and Associate of Specialized Technology degree in Advanced Manufacturing Technology program minutes do not show the day or time of the meeting. Additionally, the Commission noted that PAC commentary was thin and lacked consistent attribution as to which PAC members were making commentary. Finally, the Commission noted that CPIST did not provide evidence that the school gives consideration to PAC input.

- CPIST 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*). Previously, the Commission noted that the submitted minutes do not show sufficient commentary to determine that qualified PAC members review and comment on curriculum. The Commission noted in reviewing the submitted spring and fall 2020 PAC minutes that the provided commentary was not consistently or sufficiently detailed to show review and comment of established curriculum.

In order to allow CPIST 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 2021 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; and
  - e. Evidence that the school gives consideration to the recommendations of the PAC.
8. CPIST 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*). Previously, the Commission requested additional evidence of CPIST's curriculum and learning resource system capacity for its Healthcare Management (AST) program. In response, CPIST provided a narrative response and evidence of feasibility and industry demand. CPIST noted delays in starting the program due to issues sourcing faculty and stated that learning resources would be available and that CPIST was expanding student services and career services resources for the entire school. In reviewing the submitted material, the Commission noted that the program is at a higher level than the currently running Medical Assistant program and had concerns regarding the curriculum of the Business Management courses in the Healthcare Management. Additionally, the Commission noted that CPIST did not provide direct evidence of the learning resource system's readiness and that CPIST had not yet secured faculty for the program.

As such, the Commission remains interested in determining CPIST's ongoing capacity to offer the Healthcare Management (AST) program. Accordingly, the Commission directs the school to submit the following:

- a. An update as to the current status of the Healthcare Management (AST) program;
- b. A description of the curriculum for the Business Management courses with evidence that the course curriculum is current;
- c. A description and evidence of the learning resources currently available for the Healthcare Management (AST) program and a list of any proposed resources with the budget to acquire those resources; and
- d. An update regarding CPIST's efforts in sourcing, hiring, and retaining faculty.

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### **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.

CPIST 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.<sup>5</sup> 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.

CPIST 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](#).

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<sup>5</sup> 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](http://www.accsc.org).

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 June 10, 2021**. If a response, the required fee,<sup>6</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 10, 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

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<sup>6</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.