



Accrediting Commission of Career Schools and Colleges

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March 29, 2024

**ELECTRONIC DELIVERY**

██████████  
President

The North Coast College  
11724 Detroit Ave.  
Lakewood, Ohio 44107

**School #M000710**  
**Continued Probation Order**

Dear ██████████:

At the February 2024 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue The North Coast College (“NCC”) located in Lakewood, Ohio, on Probation until the completion of the corresponding on-site evaluation (“COSE”).<sup>1</sup> Upon review of the September 25, 2023 On-site Evaluation Report from the COSE and the school’s response, the Commission voted to **continue the school on Probation** through the remainder of and for the sole purpose of the teach-out of current students with a closure date of August 30, 2024.<sup>2</sup> The requirements for the school’s continued accreditation are set forth below.

In the March 9, 2023 Probation Order, the Commission had notified the school of the following areas of noncompliance with accrediting standards to be reviewed at the corresponding on-site evaluation<sup>3</sup> and to demonstrate:

1. Adequate management or sufficient administrative capacity and, as such, has not provided sufficient assurance that the school can operate in compliance with accrediting standards, meets its objectives, and fulfill its obligations to students in an ongoing manner (*Section I, Statement of Purpose, Substantive Standards, Standards of Accreditation*).
2. Financial soundness with resources sufficient for the proper operation of the school and the discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*).
3. Successful student achievement, particularly through presenting acceptable rates of student graduation (*Section VII (B)(2)(b), and Appendix VI, Substantive Standards, Standards of Accreditation*).
4. Verifiable records supporting its reported rates of employment (*Section VI (C)(2) and Section VII (B)(3), Substantive Standards, Standards of Accreditation*).

In the September 25, 2023 On-site Evaluation Report (“OER”) from the COSE, the visiting team found that The North Coast College did not demonstrate:

1. Adequate management or sufficient administrative capacity such that the school could not provide sufficient assurance that it can operate in compliance with accrediting standards, meets its objectives, and fulfill its obligations to students in an ongoing manner (*Section I, Statement of Purpose, Substantive Standards, Standards of Accreditation*).

<sup>1</sup> For the history of the Commission’s review of this matter see the March 9, 2023 Continued Probation letter.

<sup>2</sup> This action means that the school may not enroll any new students.

<sup>3</sup> In the March 9, 2023 letter the following areas were identified as remaining concerns regarding the school’s compliance with accrediting standards but not yet an affirmative finding of non-compliance: (1) The school may not describe in the catalog, advertise, or promote new programs or degree programs prior to receiving written Commission approval (*Section IV (B)(8), Substantive Standards, Standards of Accreditation*); (2) The school must have an admissions process for distance education programs and courses of study that includes the use of an assessment tool (e.g., test, preparation/ orientation course, etc.) to determine if the student’s learning style is conducive to online learning (*Section IX (F)(b), Substantive Standards, Standards of Accreditation*).

2. Financial soundness with resources sufficient for the proper operation of the school and the discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*).
3. Successful student achievement and acceptable rates of student graduation (*Section VII (B)(2)(b), and Appendix VI, Substantive Standards, Standards of Accreditation*).
4. Verifiable records supporting its reported rates of employment (*Section VI (C)(2) and Section VII (B)(3), Substantive Standards, Standards of Accreditation*).
5. That the school refrained from advertising or promoting new programs prior to receiving written Commission approval (*Section IV (B)(8), Substantive Standards, Standards of Accreditation*).
6. An admissions process for distance education programs and courses of study that includes the use of an assessment tool (e.g., test, preparation/ orientation course, etc.) to determine if the student’s learning style is conducive to online learning (*Section IX (F)(b), Substantive Standards, Standards of Accreditation*).
7. Attentiveness to its students’ educational and other needs as a means to support retention (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*).
8. Compliance with accrediting standards relative to recruitment and admissions including:
  - a. A determination that an applicant meets the school’s admissions requirements prior to enrollment (*Section V (A)(4)(a) Substantive Standards, Standards of Accreditation*) and
  - b. A prohibition on personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement (*Section IV (A)(13), Substantive Standards, Standards of Accreditation*).
9. Verification and documentation of prior work experience of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*).
10. Utilization of an enrollment agreement that includes, at a minimum, all required items listed on the ACCSC Enrollment Agreement Checklist (*Section IV (C)(2)(a), Substantive Standards, Standards of Accreditation*)
11. A catalog in compliance with accrediting standards (*Section IV (C)(1)(a), Substantive Standards, Standards of Accreditation; Section IV (C)(1)(c), Substantive Standards, Standards of Accreditation; and Section VI (D)(2), Substantive Standards, Standards of Accreditation*)
12. Disclosure, minimally, of accurate graduation and graduate employment rates for each program offered as last reported to the Commission (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*).

The school’s response to the September 25, 2023 OER does not address any of the team findings and instead includes an ACCSC Institutional Teach-Out Plan Approval Form. The teach-out plan indicates that the school’s plan is to close on August 30, 2024 after all students have completed their education (there are eight students currently enrolled—seven of whom will graduate in April 2024 and one who will graduate at the end of August 2024). The Commission noted, however, that the notice to students states that “[t]he final day of teach-out is planned for April 30th, 2024.” Therefore, the Commission is interested in clarification regarding the closure date.

In addition, the Commission is concerned that the list of students and tuition and fees information included as part of the teach-out plan information shows in many cases the amount of tuition and fees paid by the

student exceeds the total tuition for the program (Tuition and fees total featured in course catalog and website).

The Commission also considered that the school missed the deadline to submit June 30, 2023 audited financial statements, originally due in the Commission's office by December 31, 2023. Upon request by Commission staff for the financial statements via email dated January 18, 2024, the school replied in an email dated January 19, 2024 that it terminated participation in Title IV programs on November 15th, 2023 and that the Department only requested that the school conduct a final compliance closeout audit, submitted on January 8, 2024. The school's email also stated that since the Department did not request the audited statements due to the closing announcement, the school assumed the same for ACCSC but stated that the school will provide the Commission with the closeout compliance audit, if requested.

Overall, although the school did not respond to the outstanding compliance issues, given that the students are close to completion, the Commission decided to allow the school to remain on Probation for the sole purpose of allowing the students to complete their education provided that the school submits the following:

- a. An update on the progress of the teach-out for each of the remaining eight students to include any changes to estimated graduation dates, if applicable;
- b. A clarification of the closure date and a commitment to complete the education of all students including the last student through August 30, 2024;
- c. A copy of the close out audit from the Department of Education; and
- d. An explanation as to why students have paid more than the total tuition and fees and student ledgers as well as transcripts for all eight students to support this explanation.

### **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. **Failure of the school 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 the school is on Probation. However, a school that is subject to Probation may seek the Commission's approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation (Section VII (L)(6) 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 are made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies.

### **Maximum Timeframe To Achieve Compliance:**

According to *Section VII (M), Rules of Process and Procedures, Standards of Accreditation*, where the Commission has found an area in which the school is out of compliance with accreditation standards or requirements, the period allotted to the school to remedy the noncompliance or cure the deficiency, together with the time for the Commission's final decision, will not exceed the lesser of 150% of the length of the

longest program offered at the school or three years unless there is good cause to extend the period for achieving compliance. Therefore, based on the school's longest program of 48 months, the maximum timeframe allowed for NCC to achieve and demonstrate compliance with the *Standards of Accreditation* begins as of the date of the September 6, 2022 Probation Order and will not extend beyond September 7, 2025 (to include sufficient time for the Commission's review of the school's compliance in advance of the maximum timeframe date). Please also be advised that the Commission is not required to allow the maximum time frame for the school to remedy noncompliance, and given the severity of the findings included herein, the Commission may establish a shorter timeframe as deemed appropriate, including taking an immediate adverse action at its next meeting for failure to demonstrate compliance with accrediting standards.

### **Notification To Students:**

The school must **within seven days** inform current and prospective students in writing that the school has been continued on Probation, provide a summary of the reasons for the Probation, and indicate where 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, 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.

The North Coast 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.<sup>4</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.

The North Coast 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 College 360 DMS Submissions 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 ACCSC 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 April 25, 2024**. If a response and the certification

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<sup>4</sup> ACCSC has resources for submitting a well-documented and organized response for Commission consideration. As a reminder *Section I (H)(1) Rules of Process and Procedure, Standards of Accreditation*, states that all submissions and notifications must be organized as required by the *ACCSC Instructions for Electronic Submission*. More information is available on the [ACCSC website](#) under [Resources](#) and [Forms and Reports](#).

attesting to the accuracy of the information is not received in the Commission's office **on or before April 25, 2024**, 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] or [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].

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director