



Accrediting Commission of Career Schools and Colleges

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ELECTRONIC DELIVERY

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ASPIRA City College
4322 North 5th Street
Philadelphia, Pennsylvania 19140

School #M067702
Continued Warning

Dear ██████████

At the February 2023 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation, Application for Initial Distance Education, and Warning for ASPIRA City College (“ASPIRA”) located in Philadelphia, Pennsylvania. Upon review of the December 15, 2022 On-site Evaluation Report (“OER”) and the school’s response to that report, the Commission voted to continue ASPIRA on **Warning** with a subsequent review scheduled for ACCSC’s **August 2023** 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 Commissions Review

- At the November 2013 meeting, the Commission considered the Application for Renewal of Accreditation and voted to grant the school renewal of accreditation for five years with a stipulation, which was later satisfied, and placed the school on Program Advisory Committee (“PAC”) and Program Evaluation Reporting.
- At the March 2015 meeting, the Commission considered the PAC Report, Program Evaluation Report, and 2014 Annual Report Rates. The Commission voted to accept the Program Evaluation Report, continue the school on PAC Reporting, and place the school on heightened monitoring for the 18-month Health Information Technology (Diploma) program (Student Achievement).
- At the March 2016 meeting, the Commission considered the PAC Report and voted to continue PAC Reporting.
- At the November 2016 meeting, the Commission considered the school’s Employment Verification Information and voted to place ASPIRA on Employment Verification Reporting.
- At the May 2017 meeting, the Commission considered the Application for Renewal of Accreditation, the Application for a Change of Location, and the PAC and Employment Verification Reports. The Commission voted to defer final action to the November 2017 meeting.
- At the November 2017 meeting, the Commission considered ASPIRA’s deferral response and voted to grant renewal of accreditation for five years, accept the Change of Location and Employment Verification Reports, continued on PAC Reporting, and place the school on Outcomes Reporting for the 12-month Medical Office Assistant (Diploma) and 15-month Computer Technology-Web Design/Program Option (AST) programs.
- At the February 2019 meeting, the Commission considered the 2018 Annual Report Rates, Outcomes report, and PAC Report. The Commission voted to continue PAC Reporting and to continue Outcomes Reporting for the 12-month Medical Office Assistant, and 15-month Computer Technology Web Design/Program Option. The Commission also voted to expand the Outcomes Report to include the

24-month Computer Technology-Computer Specialist, 15-month Computer Technology-Computer Specialist, and 9-month Medical Office Assistant programs.

- At the August 2019 meeting, the Commission considered the Outcomes and PAC Reports and voted to continue PAC Reporting and continue Outcomes Reporting for the 9-month Medical Secretary (formerly Medical Office Assistant), 12-month Medical Secretary (formerly Medical Office Assistant), 15-month Computer Technology-Web Design/Program Option, 24-month Computer Technology-Computer Support Specialist programs.
- At the August 2020 meeting, the Commission considered the school’s Application for a Change of Ownership and determined that ASPIRA met the requirements for the Change of Ownership and voted to continue the school’s accreditation under the new ownership. The Commission also voted to place the school on Student Satisfaction Reporting.
- At the February 2021 meeting, the Commission considered the Outcomes, PAC, and Student Satisfaction Reports. The Commission voted to accept the Student Satisfaction Report and continue PAC Reporting and Outcomes Reporting for the 9-month Medical Secretary, 12-month Medical Secretary, 15-month Computer Technology-Web Design/Program Option, and 24-month Computer Technology-Computer Support Specialist programs.
- At the May 2022 meeting, the Commission considered the Outcomes and PAC Reports. The Commission voted to place the school on Warning with a subsequent review scheduled in conjunction with the school’s pending renewal of accreditation on-site evaluation.

February 2023 Meeting Review and Action:

1. ASPIRA must demonstrate that the school has adequate management and administrative capacity in place that includes full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). The On-site Evaluation Team found that the school lacks formal policies and procedures in every operational area which appeared to create an environment in which administrators shared all duties and that the provided policies did not appear to be consistently applied and followed. The On-site Evaluation Team further found that school administration does not appear to be effectively creating, assessing, and implementing strategies to bolster the health of overall school operation.

In reviewing ASPIRA’s response to the December 16, 2022 OER, the Commission noted that ASPIRA changed the Campus Director and Assistant Campus Director positions to new titles, Executive Director and Campus Director, respectively, with the new Campus Director to be on-site at the school at all times. Additionally, ASPIRA analyzed job titles and responsibilities and found that the Executive Director “had too many titles” and that the Campus Director “had too many supportive roles” (January 16, 2023 ASPIRA Response, p. 31). As such, ASPIRA added two positions, a Financial Aid Coordinator and a Career and Student Services position. ASPIRA further stated that the Campus Director and Campus Assistant Director responsibilities were split after the On-site Evaluation with the Campus Director overseeing the campus, curriculum development, and admissions and the Campus Assistant Director overseeing onsite operations, financial aid, and processes over policies and procedures. ASPIRA provided documentation in the form of an Organizational Chart, job descriptions for all school administrative roles, and professional development activities for school administrators over the last 24 months.

The Commission reviewed this information and found, however, that ASPIRA’s response contains insufficient information regarding team’s ability to lead and manage the school including the implementation of the school’s policies and procedures. Additionally, the Commission reviewed the school’s Organization Chart and found that the chart does not appear to align with the school’s responses. Specifically, the chart appears to reflect the previously used titles and does not appear to designate an individual to complete financial aid activities. Given the breadth of the issues enumerated below concerning policies and procedures, the Commission maintains its interest in confirming that ASPIRA has a team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. A detailed narrative and justification regarding the sufficiency of the school’s management and administration team, particularly given the breadth of issues addressed in this Warning;
 - b. Documentation for the Executive Director and Campus Director demonstrating that these individuals possess the appropriate combination of education, experience, and demonstrated ability to lead and manage and post-secondary educational institution;
 - c. A detailed narrative regarding the ability of school personnel to manage and implement policies and supporting documentation of policy and procedure management and implementation;
 - d. An updated Organization Chart reflecting new job titles and any new hires; and
 - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
2. ASPIRA must demonstrate that the school has adequate management and administrative capacity in place that includes appropriate administrative and operational policies and procedures to which the school adheres, reviews, and updates as needed (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*). The On-site Evaluation team found that ASPIRA did not appear to consistently follow financial aid and admissions procedures and that the school did not produce formal policies and procedures in operational areas including education, student services, and career services. In response to the December 16, 2022 OER, ASPIRA provided a chart of recent policy revisions, an updated policies and procedures manual, an Organization Chart, and job descriptions. ASPIRA additionally noted that the school checks the propriety of administrative and operational policies and procedures and that the school’s leadership team is in close contact with students to analyze the impact and constancy of policies and procedures.

However, the Commission found that the provided policies and procedures manual appears, in some areas, to align more closely to a detailed description of job duties rather than actual policies and procedures. Further, the policies and procedures did not address the issues raised by the On-site Evaluation Team, that while ASPIRA’s policies and procedures contain educational areas, they do not encompass areas such as student services and career services. Moreover, the provided policies and procedures contain use of the term, “University” (*Id.*, pgs. 261, 306, 317, 321) and contains mention of school “athletic teams, the marching band and pep band, debate teams, and other recognized groups” which do not pertain to ASPIRA (*Id.*, p. 336). Finally, the Commission noted that while ASPIRA provided an email showing communication of updated policies and procedures, the Commission is interested in a more fulsome account and documentation of the school’s implementation of its policies and procedures.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. The school’s updated policies and procedures encompassing all required areas including student and career services;
 - b. A description of the school’s implementation of new policies and procedures;
 - c. Any available documentation to show the school’s implementation of new policies and procedures;
 - d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
3. ASPIRA must demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the December 15, 2022 On-site Evaluation Report, the school reported the following student achievement rates using a January 2023 Report Date on the Graduation and Employment Chart:

Program (Credential)	Length in Months	ASPIRA Graduation Rate	ACCSC Benchmark Graduation Rate	ASPIRA Employment Rate	ACCSC Benchmark Employment Rate
Medical Secretary (Diploma)	7	40%	60%	50%	70%

The Commission found that ASPIRA reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.¹ The Commission noted that the school provided a Graduation and Employment Chart for the 7-month Medical Secretary (Diploma) program. The Commission’s records as well as the December 22, 2022 On-Site Evaluation Report indicate this to be a 9-month program. The Commission’s July 19, 2022 Warning noted this program changed lengths from 18 to 12-months, while also maintaining a 9-month version. Although the benchmark rates for a 7-month program do not differ from a 9-month program, the Commission requires an explanation for the varying program lengths as reported in the school’s January 2023 Graduation and Employment Chart. The Commission has previously noted in its July 19, 2022 Warning that the Medical Secretary program (formerly Medical Office Assistant) has been below benchmark and on Reporting for either the 9-month or 12-month version of the program since 2017, questioning the program’s viability as well as the efficacy of the school’s student achievement improvement plan. The most recent graduation and employment rates continue to establish an inconsistent below benchmark trend in the school’s history of reporting for this program.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. The school’s student achievement improvement plan for the Medical Secretary (Diploma) 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;

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

- v. Student Services; and
- vi. Career services and employer engagement.
- b. An evaluation of current employment trends including an assessment as to when the program’s graduation and 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 the Medical Secretary 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 2021 Report Date	July 2022 Report Date	July 2023 Report Date
Medical Secretary (Diploma)		G			
		E			

- e. A Program Viability Study for the Medical Secretary program that specifically addresses, given the low reported rates of graduate employment, whether the school’s program offerings adequately prepare students for entrance or advancement in training related occupations to include both internal and external review and validation of the program content and objectives as well as an analysis of the job opportunities for the school’s graduates in each of the school’s program offerings.
- f. A description of the admissions process for the Medical Secretary program and a demonstration that the school, as a means to increase retention, shares with applicants prior to enrollment the average salary of its employed-in-field Medical Secretary graduates.
- g. An analysis of retention activities and ACCSC Retention Charts² for the Medical Secretary program offered at the school using a **July 2023 Report Date**.
- h. An explanation regarding the length of the program (i.e., is the program 7, 9, or some other number of months in length);
- i. A Graduation and Employment Chart for Medical Secretary program using **July 2023 Report Date**.
- j. Summary information for the Graduation and Employment Chart 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	Medical Secretary	1/10/2018	10/01/2018	N/A
2	12346	Medical Secretary	1/10/2018	N/A	3/10/2018

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					

² Available for download at <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>

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 Employ.	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						

and

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.

4. ASPIRA must demonstrate that the school supports student achievement rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The On-site Evaluation Team noted that using a July 2022 Report Date across both programs, the school reported one graduate as employed-in-field. To support that classification, the school provided an offer letter, which included the company’s name and address, but provided no evidence that the student began work. Additionally, the information included in the record does not make clear whether the school secured written verification from the graduate or the employer, or if the school verbally verified with both the graduate and the employer. Finally, the documentation did not provide required elements outlined in *Appendix VII – Guidelines for Employment Classification*, including graduate contact information, date of initial employment, employer/supervisor contact information, and date of verification.

In response to the December 15, 2022 OER, the school provided the policies and procedures related to initial employment verification, a sample employment verification form, and the 10 most recent examples of graduate employment verification forms. However, in reviewing the four forms completed in 2022, the Commission identified several inconsistencies and questions of documentation, to include two instances of forms that do not contain a signature or date in the supervisor information section, as

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.

well as the school’s use of the phrase “School/self-verified by the school” (*Id.*, p. 395), as written on the side of the form. The Commission found that the verification forms provided continue to call into question the source and type of the verification that occurred. Additionally, if the provided verifications are verbal, then the school must demonstrate verification with the graduate and employer along with documentation of the diligent effort to obtain written documentation as per the *Graduation and Employment Verification – Classification* and the *Standards of Accreditation*.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. The school’s policies and procedures related to initial employment verification, and an explanation of any revisions;
- b. A copy of the school’s current verification form or other tool the school is currently using to verify employment;
- c. A list of the most recent graduates who gained employment in the career field for which the school provided education for any graduate (all programs) since the school’s response to the December 16, 2022 OER using the following chart:

Count	Student ID#	Program	Start Date	Grad. Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title	Source of Verification ⁵ (i.e., graduate or employer)
1	12345	Medical Assistant	1/10/2017	01/10/18	Sample Medical Office, Karen Doe 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2018	Medical Assistant	Graduate
2	12346	Medical Assistant	1/10/2017	01/10/18	Medical Services, Sally Wray 456 Maple Dr. Somewhere, VA 333.444.5678	3/1/2018	Medical Assistant	Employer

- d. The following supplementary information for each graduate identified in the chart above:
 - i. The school’s completed verification form for each graduate employed;
 - ii. For each graduate classified as self-employed, 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; and
 - iii. For each graduate classified as “career advancement,” 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

⁵ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

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; and

- e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with ACCSC’s requirements.

5. ASPIRA must demonstrate that the school has and applies a fair and equitable refund policy also in compliance with applicable requirements and generally accepted practices (*Section I (D)(3), Substantive Standards, Standards of Accreditation*). The On-Site Evaluation Team found that upon review of eight withdrawn/terminated student files, two of the files showed refunds issued beyond the school’s 30-day requirement.

In response to the December 16, 2022 OER, ASPIRA provided the school’s refund policy and acknowledged the team’s finding. ASPIRA noted that changes in staffing and shifting responsibilities lead to the two late refunds; provided a list of the 10 most recent withdrawn students; and stated that no new refunds have been required since the evaluation. ASPIRA further noted that additional training took place in monthly meetings to review student accounts and funds along with in-person and virtual Title IV and HEA Regulations training. In order to give ASPIRA an opportunity to fully show the impact of training on the school’s refund procedures, the Commission is interested in reviewing any available new refund documentation of implementation as it becomes available.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. Any withdrawn students owed a refund since the submission of the response to the December 16, 2022 OER in the following format:

Student ID#	Start Date	Last Date of Attendance	Date of Determination	Due Date	Date Refund Paid	Refund Amount

- b. Supporting documentation of the dates and amounts given in item (a.) above;
- c. Any additional supporting documentation of refund policies and procedures and training; and
- d. Any additional information the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

6. ASPIRA must demonstrate that the school has an established admissions process for distance education programs and courses of study that includes an assessment of the student’s ability to succeed and capability to benefit from enrolling in a distance education environment (*Section IX (F)(2)(a-b) Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the team found that although the school provided an example of the Distance Education Admission’s assessment in the application for initial distance education approval, the school did not appear to implement the assessment in the admissions process.

In response to the December 22, 2022 OER, the school provided the admissions process that stated that “candidates must submit a Distance Education Readiness Evaluation and achieve a score of 25 points or more” (*Id.*, p. 48). In addition, ASPIRA submitted documentation of the admissions process to include the Distance Education Readiness Evaluation for six students who began classes on January 9, 2023. The Commission noted that the Distance Education Readiness Evaluation consists of 20 statements where the prospective student rates a response on a five-point scale from Strongly Disagree,

worth one point, to Strongly Agree, worth five points. The Distance Education Readiness Evaluation includes the following scale for the results:

Evaluating The Results

Total the values you used to rate yourself. The highest number you can get is 100. The higher your score, the more likely your success in self-directing learning opportunities like online courses. The evaluation summaries below may help you in determining your readiness for taking an online course:

100 - 75: *You should be well-suited for taking courses online. You are self-aware and should easily navigate courses taken at a distance.*

74 – 55: *You should do fairly well taking courses online. Establishing goals and setting timelines will be necessary for you.*

54 – 25: *You may be more suited to an on-campus course but participation in online group settings should prove valuable to you.*

24 and below: *You would benefit by taking some assessments of your learning prior to taking an online class. (Id., p. 647)*

The Commission found that the prospective student could “Disagree,” worth two points, with all 20 statements and still obtain a passing score above 25. As such, the Commission questioned whether the school has demonstrated the validity and reliability of the assessment tool used to assess a student’s readiness for distance education (*Section IX (F)(3), Substantive Standards, Standards of Accreditation*). In addition, the Commission noted that a score of 24 and below references “some assessments” but the response does include documentation pertaining to the assessments.

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

- a. The school’s admission requirements for enrollment into each distance education program or course of study;
- b. An explanation as to how – as part of the admissions process and prior to enrollment – the school determines if a student has the technical skills, competencies, and access to technology necessary to succeed in a distance education environment;
- c. An explanation as to how – as part of the admissions process and prior to enrollment – the school determines if a student has the capability to benefit from enrolling in a distance education program and whether the student’s learning style is conducive to online learning;
- d. An explanation and justification as to how the school has demonstrated the validity and reliability of the assessment tool used to assess a student's readiness for distance education given the Commission’s finding that a student can “Disagree” with every assessment question and still obtain a passing score;
- e. An explanation as to the assessments a student may be required to complete upon not passing the Distance Education Readiness Evaluation;
- f. A list of the 10 most recent applicants to all programs for that are delivered in a distance education format;
- g. Documentation that the school determined prior to enrollment that the student had the necessary technical skills, competencies, and access to technology necessary to succeed in a distance

education environment; that the student has the capability to benefit from enrolling in a distance education program; and whether the student’s learning style is conducive to online learning for the applicants listed above; and

- h. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
7. ASPIRA must demonstrate that the school develops admissions criteria that are designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered (*Section V (A)(1), Substantive Standards, Standards of Accreditation*). The On-site Evaluation Team found that the school requires students to sit for the Accuplacer (formerly Wonderlic) entrance exam. On the Wonderlic, students needed to demonstrate a minimum score of 13 and on the Accuplacer the students need to demonstrate a minimum score of 236. If students do not meet the minimum score, they are required to participate in the Accuplacer test prep course, but they do not have to retake the test or demonstrate that they’ve passed, only that they’ve participated in order to enroll. Additionally, two of 11 students followed this protocol, but upon review of the student files, the team noted that student [REDACTED]’s high school transcript demonstrated a 0.772 cumulative GPA with an original Wonderlic score was a 7, and student [REDACTED] originally scored a 6 on the Wonderlic and a score below 236 on the Accuplacer. In light of the school’s graduation and retention rates, the school has not demonstrated that the admissions criteria are designed and implemented in such a way as to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered.

In response to the December 22, 2022 OER, ASPIRA stated that the admissions requirements are consistently and fairly applied and noted that the school “cannot single out a low GPA that was given to us if we do not request GPAs from other students” (*Id.*, p. 53). In addition, ASPIRA provided the school’s admissions requirements as published in the school’s catalog to include an entrance exam requirement that states:

*All applicants must take the ACCUPLACER placement exam. The ACCUPLACER exam is a computer-based, untimed placement test developed by College Board to identify the basic skill levels of students as they enter college. This information is important when selecting appropriate college level courses. The results suggest the likelihood of student success in specific college-level courses. The ACCUPLACER exam measures applicants’ current level of performance in reading, writing, arithmetic algebra, and math. Applicants must score 236 or above to proceed with the admissions process. If an applicant scores below 236, they may take remedial courses in English and Math for a \$75 fee. If an applicant passes the remedial coursework, they may complete the admissions process. If an applicant does not pass the remedial courses on their first attempt, they may attempt to pass the course(s) a total of three times. (*Id.*, p. 52)*

However, the response does not include any information or documentation of the remedial coursework a student may be required to complete. Additionally, although ASPIRA asserted that the school “ensures the admissions criteria at ASPIRA City College are designed to admit those students who are reasonably capable of successfully completing and benefiting from the training offered at the college” (*Id.*, p. 53), the school did not provide any rationale to demonstrate how the school ensures this.

With regard to students [REDACTED] and [REDACTED], ASPIRA stated the following:

The additional information presented here are the academic transcripts and progress reports demonstrating the students' academic commitment to successfully completing the program and demonstrating their ability to be placed in entry-level employment opportunities. This additional information has been included in Exhibit 10.4 Academic Transcripts and Progress Reports.

Upon review of the information provided, the Commission found that student [REDACTED] is currently on Academic Warning with a cumulative GPA of 1.76 and that for student [REDACTED], four of 12 courses include an "R – Course Attempted-Recurring" grade and two of 12 courses include an "I – Incomplete" grade. In addition, the Progress Reports included as part of the documentation do not include signatures from the student or the campus director. Based on the recent academic performance of the students, the Commission questioned whether the school's admission policy is, in fact, designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered.

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

- a. An explanation and justification as to how the school's admission policy is, in fact, designed to admit only those students who are reasonably capable of successfully completing and benefiting from the training offered, particularly given the Commission's findings expressed above;
 - b. Information of the remedial coursework a student may be required to complete along with documentation for anyone who completed the remedial coursework;
 - c. An academic update on students [REDACTED] and [REDACTED] identified during the on-site evaluation;
 - d. The school's policies and procedures for admissions, to include any processes pertaining to administering and grading the entrance exam, verifying admissions documentation, and signing and accepting the enrollment agreement; and if applicable, rubrics used for the grading of the entrance exam and evidence of applicants taking the Accuplacer test prep course, as applicable;
 - e. The school's admissions requirements and procedures as published in the catalog;
 - f. A list of all students who enrolled and started classes since the submission of the school's response to the on-site evaluation (if no students have started classes since the on-site evaluation, then a list of all students who have executed Enrollment Agreements);
 - g. For each student identified in Item (f.) above, the admissions documentation the school relied upon to ensure the applicant met the admissions criteria, to include the admissions test results, proof of high school graduation or equivalent, payment of fees, etc.; and
 - h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
8. ASPIRA must demonstrate that the school utilizes an Enrollment Agreement that includes, at a minimum, all required items listed on the ACCSC Enrollment Agreement Checklist and that clearly states the obligations of both the student and school (*Section IV (C)(2), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the team noted concerns that the executed Enrollment Agreements do not consistently include all items required by the ACCSC Enrollment Agreement Checklist.

In response to the December 16, 2022 OER, ASPIRA provided an updated copy of the school’s Enrollment Agreement cross-referenced with the ACCSC Enrollment Agreement Checklist. In addition, the school provided copies of executed Enrollment Agreements for the five most recently enrolled students. While the updated Enrollment Agreement does now appear to include all required items, in reviewing the submitted executed Enrollment Agreements, the Commission noted the following:

Student Name	Start Date	Graduation Date	Notes
█	January 9, 2022 (appears to be incorrect)	August 18, 2023	<ul style="list-style-type: none"> Length as 30 weeks does not align with Start Date and Graduation Date No Credential Awarded Upon Graduation listed No Program Length listed Printed Page 2 lists Student First Name, Student Last Name, credential, or Program Title instead of the information pertaining to the student Includes pagination in incorrect places Does not appear to include the signature of the accepting official only Malea Huth, the admissions representative
█	January 9, 2023	August 18, 2023	<ul style="list-style-type: none"> Page 1 lists Student First Name, Student Last Name, credential, or Program Title instead of the information pertaining to the student Student signed on December 25, 2022 after the Admissions Representative Malea Huth and Signature of Authorized ASPIRA City College Official Nerissa Conn on December 20, 2022
█	January 9, 2023	No Date Listed	<ul style="list-style-type: none"> Page 1 lists Student First Name, Student Last Name, credential, or Program Title instead of the information pertaining to the student
█	January 9, 2023	August 18, 2023	<ul style="list-style-type: none"> Page 1 lists Student First Name, Student Last Name, credential, or Program Title instead of the information pertaining to the student
█	January 9, 2023	June 28, 2024	<ul style="list-style-type: none"> Page 1 lists Student First Name, Student Last Name, credential, or Program Title instead of the information pertaining to the student Signed by the Admissions Representative Malea Huth on December 28, 2022 after it was Approved with Signature of Authorized ASPIRA City College Official Nerissa Conn on December 20, 2022
█	January 9, 2023	August 18, 2023	<ul style="list-style-type: none"> Page 1 lists Student First Name, Student Last Name, credential, or Program Title instead of the information pertaining to the student Page 1 does not include the Representative’s Initials Signed by the student on and Admissions Representative Malea Huth on December 28, 2022 after it was Approved with Signature of Authorized ASPIRA City College Official Nerissa Conn on December 20, 2022

In addition, all Enrollment Agreements refer to the Program Delivery Model as “Distance Education-Blended-Hybrid, On-ground” without a clear indication of which version the student is enrolled in and it is unclear what this designation refers to as the school is only approved to offer programs in residential and hybrid versions.

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

- a. The school's policies and procedures for the admissions process to include when the Enrollment Agreement is signed by the accepting school official;
- b. An updated Enrollment Agreement cross-reference with the ACCSC Enrollment Agreement Checklist;
- c. An explanation for the incorrect page designations on A. B's Enrollment Agreement;
- d. An explanation for the signature dates as described in the chart above;
- e. A list of all students who enrolled since the submission of the school's response to the on-site evaluation;
- f. For each student identified in Item (e.) above, a copy of the executed Enrollment Agreement; and
- g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

The Commission will also review submitted Enrollment Agreements to assess the school's implementation of other associated policies and procedures.

9. ASPIRA must demonstrate that the school maintains adequate student services and resources that support its students in maintaining satisfactory progress, achieving successful educational and student achievement outcomes (i.e., knowledge and skill attainment, retention, graduation, and employment), and making informed decisions concerning training and employment (*Section VI (A)(2), Substantive Standards, Standards of Accreditation*). In response to the December 15, 2022 OER in this regard, the school indicated it plans to add a new staff position, Student and Career Coordinator, with duties including a wide breadth of other responsibilities such as Academic Advising, providing personal counseling, assisting with crisis counseling, referrals to outside community resources when necessary, and networking with high schools and building partnerships. While the school provided a job description and a potential candidate's resumé, the Commission seeks evidence that position and candidate have been secured along with evidence of implementation of the position's job duties. Additionally, although the school provided a brief narrative of examples of programs that are under consideration regarding student services, ASPIRA did not provide a cogent explanation as to how and why the school believes its specific efforts will positively impact the student population and will support students in the successful achievement of the school's educational objectives.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. An update regarding the hiring of a new Student and Career Services Coordinator Position candidate;
- b. A detailed explanation justifying how the identified candidate is qualified for the new Student and Career Services position;
- c. Evidence of any implementation activities completed by the Student and Career Services position;
- d. The school's policies and procedures pertaining to student services along with an explanation of updates, as applicable;
- e. Contracts with any outside entities that offer services to ASPIRA City College students;
- f. An assessment regarding the impacts of these services on the student population;

- g. An assessment as to how the current student services are adequate for the student population and will support students in the successful achievement of the school's educational objectives; and
 - h. Any additional information the school believes will assist the Commission in determining the school's compliance with accrediting standards.
10. ASPIRA must demonstrate that its faculty engage in ongoing faculty assessment and professional development activities that: are appropriate to the size and scope of the school's educational programs; support the quality of education provided; and enhance student learning and achievement (*Section III (A)(2), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the school did not provide documentation of ongoing professional development or regular assessments for faculty members.

In response to the December 16, 2022 OER, ASPIRA provided procedures for the following: ongoing faculty assessment; end-of-course student surveys; and classroom observations conducted twice a year by the campus director. Additionally, the school provided policies for: evaluating the faculty assessment tools; faculty meetings once a semester; reviews of the student survey data and observations; and performance reviews. Further, the school stated that, "[a]ll faculty are expected to participate in minimum quarterly professional development activities directly related to teaching and mentoring at ASPIRA City College and offered through ASPIRA City College" (*Id.*, p. 60). While the school provided certificates of completion for each faculty member, the Commission noted that the professional development documentation does not indicate 2022 activities. Additionally, the Commission noted that there was no documentation provided to indicate the school completed faculty assessments in the 2022, despite the school's policies related to end-of year student surveys, performance reviews, and faculty observations conducted twice a year. Specifically, the school only provided faculty observation forms from 2019, 2020, and 2021 for three faculty members. As such, despite the identification of the policies and procedures for ensuring all faculty participate in ongoing assessment activities and faculty assessment, the school did not provide evidence that it follows its own policies.

Based on the foregoing, the Commission requires ASPIRA to submit the following:

- a. Any updates to the school's policies and procedures for ensuring that all faculty participate in ongoing training, professional development, and assessment activities;
 - b. A list of all current faculty;
 - c. Documentation that faculty are regularly assessed, to include documentation from 2022, and 2023;
 - d. Documentation demonstrating that the faculty regularly engage in professional development activities appropriate for their respective subject areas, from 2022, and 2023; and
 - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
11. ASPIRA must demonstrate that the school verifies prior work experience of all faculty members (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the school did not produce documentation to demonstrate that the school verifies prior work experience for faculty members. In response to the December 16, 2022 OER, ASPIRA stated that the school only verified education and not employment. In addition, the school provided policies and procedures for faculty employment verification, along with the Faculty Personnel Reports ("FPR") for the three current

faculty members. The Commission noted that all three faculty members have instructional work listed on the FPR and that [REDACTED] only has instructional experience listed, with no practical work experience (the Commission reminds the school that instructional experience does not qualify as practical work experience). Additionally, Instructors [REDACTED] and [REDACTED] have no prior practical work experience indicated as verified, while Instructor [REDACTED] FPR indicates only verification of the instructional experience.

Based on the foregoing, the Commission requires ASPIRA to submit the following:

- a. The school’s policy and procedures for new faculty prior practical employment verification in the hiring process along with a description of any changes made since the school’s last response, if applicable;
 - b. Updated Faculty Personnel Reports for each current faculty member, ensuring the school includes all relevant practical work experience;
 - c. Documentation showing the verification of prior practical work experience verification; and
 - d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
12. ASPIRA must demonstrate that the school internally reviews and evaluates the performance of personnel involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually (*Section IV (A)(9), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the school did not produce documentation to demonstrate that the school reviewed and evaluated the performance of the school personnel responsible for recruitment and admissions personnel at least annually. In response to the December 16, 2022 OER, ASPIRA stated the following:

The Campus Director conducts a formal performance review with admissions personnel annually. The following is a list of all personnel involved in recruiting activities:

1. [REDACTED.] – The annual review and evaluation for each person involved in recruiting activities is documented with a formal annual review form. [REDACTED] is currently the only admissions personnel and was hired in September of 2022. The Campus Director is scheduled to conduct [the] annual review in September of 2023.

However, the school did not submit the school’s policies and procedures for the annual review or the form utilized as part of the annual review process.

As such, the Commission directs ASPIRA to submit the following:

- a. The school’s policies and procedures related to internally reviewing and evaluating the performance of personnel involved in recruiting activities;
 - b. The school’s form or documentation used as part of the school’s annual evaluation;
 - c. Any updates on the review for admissions personnel [REDACTED]; and
 - d. Any additional information the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
13. ASPIRA must demonstrate that the school conducts at least one Program Advisory Committee (“PAC”) meeting annually and that the school maintains written and detailed minutes of each meeting, which

show comprehensive and clear description of the review and commentary made by the school representatives and the PAC Members (*Section II(A)(4)(b)* and *Appendix III, Substantive Standards, Standards of Accreditation*). The Commission noted the PAC minutes provided as part of the response to the December 16, 2022 OER do not include all required items as listed in *Appendix III* of the *Standards of Accreditation*. Specifically, the minutes contain only brief discussions of the program curriculum and lack written and detailed minutes of any other required topic. Additionally, the minutes provided on page 1021 of the January 16, 2023 response are for the Medical Secretary program, however, it appears that the discussion continuously refers to the Computer Technology-Computer Support Specialist program with no detailed commentary of the Medical Secretary program.

The Commission raised concerns regarding the school's ability to conduct PAC meetings to include all items in the standards based on the current meeting minutes and the school's extensive history of PAC reporting, due to continuously failing to provide adequate minutes and meeting all required elements of the standards. Although the school provided documentation that meetings were held in 2022, the content of the meetings falls severely short of the expectations of the Commission's requirements for PAC meetings and does not provide a sufficiently comprehensive and clear description of the review of and commentary made by the school representatives and PAC members.

Based on the foregoing, the Commission requires ASPIRA to submit the following:

- a. A list of the school's Program Advisory Committee members, to include titles and affiliates;
 - b. Written and detailed minutes for all PAC meetings held in 2023 for all program areas – these minutes must be clear and sufficiently comprehensive and show the PAC's review and commentary in all areas set forth in *Appendix III, Standards of Accreditation*;
 - c. A schedule for any future Program Advisory Committee meetings; and
 - d. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
14. ASPIRA must demonstrate that the school has a Leave of Absence policy in compliance with accrediting standards (*Section VII (A)(3)(c), Substantive Standards, Standards of Accreditation*). The On-site Evaluation team found that the school provided two records out of three that appeared to be approved to extend beyond 180 days. In response to the December 16, 2022 OER, ASPIRA provided the school's requirements for a leave of absence, acknowledged the team's finding, noted that ASPIRA updated procedures to enforce appropriate leave of absence lengths, and provided the school's three most recent approved leaves of absence.

In reviewing ASPIRA's response, the Commission found that the leave of absence requirements provided and published in the school's catalog does not appear to be substantially similar to the full leave of absence policy contained in the response (*Id.*, pgs. 68-70). Specifically, the full policy does not contain reference to the 180-day maximum timeframe. Moreover, it does not appear that there has been a leave of absence request by a student that would allow ASPIRA and opportunity to document any clarifications or the implementation of the leave of absence policy or procedure.

Accordingly, the Commission directs ASPIRA to submit the following:

- a. The full description of the school's Leave of Absence policy as implemented and which aligns with the leave of absence policy published in the school's catalog ;

- b. A list of any students who requested a leave of absence since the submission of the response to the December 16, 2022 OER;
- c. Documentation to show that the school followed its Leave of Absence policy for all students listed in Item (b.) above;
- d. A description of and documentation of any trainings provided to school personnel regarding ASPIRA’s Leave of Absence policy; and
- e. And additional information the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

Warning Restrictions:

Pursuant to *Section VII (K)(8), 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)(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.

ASPIRA 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.⁶ 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.

ASPIRA 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

⁶ 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.

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 15, 2023**. If a response, the required fee,⁷ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 15, 2023**, 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] at [REDACTED] or [REDACTED].

Sincerely,

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

⁷ ACCSC assesses a \$500 processing fee to a school placed on Warning.