



Accrediting Commission of Career Schools and Colleges

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September 11, 2024

**ELECTRONIC DELIVERY**

██████████  
Director  
Cambridge Technical Institute  
200 Rafael Cordero Avenue, Plaza Centro, Ste. 18  
Caguas, Puerto Rico 00725

*School #M070587*  
*Probation*

Dear ██████████:

At the August 2024 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the following:

- Cambridge Technical Institute’s (“CTI”) response to the Commission’s May 1, 2024 Warning Order;
- The Department’s July 12, 2024 Determination letter;
- The school’s July 22, 2024 correspondence to ACCSC regarding the school’s loss of eligibility to participate in the Title IV Federal Financial Aid programs by the United States Department of Education (“the Department”);
- CTI’s Application for Renewal of Accreditation; and
- CTI’s Application for a Change of Location, Part I and II.

Upon review, the Commission voted to place Cambridge Technical Institute on **Probation** with a subsequent review scheduled for ACCSC’s February 2025 meeting. In addition, the Commission requires the submission of an **Institutional Teach-out Plan and Institutional Teach-Out Agreement submitted within 45 days of receipt of this letter**. The reasons for the Commission’s decision are set forth below.

**History of the Commission’s Review:**

**December 2023 Meeting Review**

At the December 2023 meeting, the Commission considered the October 13, 2023 notification from the Department placing the school on Heightened Cash Monitoring 2 (“HCM2”) method of payment. In a letter dated October 24, 2023, the Commission acknowledged this notification and directed the school to provide additional information relative to the Department’s action. Upon review of the October 13, 2023 notification, ACCSC’s October 24, 2023 letter, and the school’s response, the Commission voted to defer action to the March 2024 meeting and to direct the school to submit additional information to demonstrate the school’s compliance with accrediting standards in the areas of compliance with federal government requirements (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*) and that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*).

**February 2024 and March 2024 Meeting Reviews**

At the February 2024 meeting, the Accrediting Commission of Career Schools, and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation and the Application for a Change of Location submitted by CTI. In addition, at the March 2024 meeting, the Commission considered

the school's HCM2 status with the Department as well as the Department's February 9, 2024 notification of CTI's ineligibility to participate in Title IV. The Commission's review considered the following:

- December 8, 2023 On-site Evaluation Report ("OER") for the school's Renewal of Accreditation and change of location on-site evaluation;
- The letters from the Department cited above (HCM2 status & Title IV eligibility);
- The Commission's December 2023 meeting letter (dated February 7, 2024) and ACCSC's Agency Notice letter to CTI (dated February 12, 2024); and
- The school's responses.

Upon review of the above information, the Commission voted to place the school on Warning and to direct the school to submit additional information to demonstrate the school's compliance the following accrediting standards:

- Continuous operation in providing education and training to students on an ongoing basis with the exception of the school's approved change of locations (*Section I (A)(11) & Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*);
- Financial soundness with resources sufficient for the proper operation of the school and discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*);
- Successful student achievement (*Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation*);
- Verifiable graduate employment records (*Section VII (B)(3), Substantive Standards, Standards of Accreditation*);
- Advertising, promotional materials, statements, and claims that 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*).

### **August 2024 Meeting Review**

#### **Area of Non-Compliance with Accrediting Standards:**

CTI must demonstrate that the financial structure of the school is sound, 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*). To better understand the circumstances involved in the school's change of location, which appears to have precipitated the school's suspending enrollment, and the Department's subsequent and associated loss of Title IV eligibility determination,<sup>1</sup> the Commission required additional information regarding the school's financial soundness, as detailed in the Commission's May 1, 2024 Warning letter. The Commission's Warning letter requires the submission of internally prepared financial statements for the 6-month period ending June 30, 2024 prepared in accordance with the requirements set forth in ACCSC's Instructions for the Preparation and Submission of Financial Statements and Related Information; a Management Discussion and Analysis narrative, examining the current financial condition of the school specifically detailing the impact of the HCM2 method of payment and the

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<sup>1</sup> The Department's determination of "continuous operation" appears to be more stringent than ACCSC's. However, if conflicts exist between federal requirements and accrediting standards, the federal requirements will take precedence. CTI must meet all applicable federal government requirements. In cases where accrediting standards and federal requirements differ, the more stringent will apply (*Section I (D)(3), Substantive Standards, Standards of Accreditation*).

subsequent loss of Title IV; and documentation of the school's cash reserves and cash infusions (e.g., documentation of bank accounts, statements, transfers, etc.). Upon review of the school's Management and Discussion Analysis, the Commission noted the following statements:

*The school's financial condition has been significantly affected by several recent events, notably the introduction of the Heightened Cash Monitoring 2 (HCM2) method of payment and the subsequent loss of Title IV federal funding. Despite the institution, initiate the disbursement process under HCM2 method [sic], no fund requests were completed because the process turned out to be extremely complicated. Just as we were nearing completion, we received notice of loss of eligibility. Certainly, the school's cash flow has been adversely affected due to the loss of Title IV federal funding. The delay in reimbursements has resulted in financial instability, making it challenging to budget and forecast accurately. A considerable number of prospective and current students depend on Title IV funds to finance their education. The loss of this funding has led to a notable decrease in enrollment, directly impacting tuition revenue (June 28, 2024 CTI Response, pg. 20).*

Upon review of the narrative, the Commission expressed grave concern regarding the school's financial soundness, particularly in light of the school's inability to access Title IV funds and the school's own analysis of the impact of the U.S. Department of Education's ("the Department") determination.

In addition, the school provided internally prepared financial statements for the 6-month period ending June 30, 2024 showing positive working capital of [REDACTED] ([REDACTED] current assets to [REDACTED] current liabilities); positive stockholder's equity of [REDACTED]; and positive net income of [REDACTED]. The school also provided bank statements and a description of cash reserves and cash infusions indicated that for 2024 CTI had received cash inflows totaling [REDACTED]—student payments of [REDACTED], [REDACTED] for [REDACTED], and related party for [REDACTED]). In attempting to reconcile the school's narrative regarding the reliance on Title IV funds and the school's financial documentation, the Commission questioned the [REDACTED] "Related party" cash infusion source, as the response does not provide any additional information, context, nor prospects for continued contribution. As such, Commission questioned the sustainability of this revenue source in light of the school's own admission that "it has been a challenge to maintain operation" (*Id.*, pg. 21) and particularly, given that the sum constitutes the majority of the school's cash.

ACCSC also reviewed the school's fiscal year-end December 31, 2023 and 2022 audited financial statements received by the June 30, 2024 deadline, which showed the following:

- Two consecutive years of a net loss of [REDACTED] for 2023 and [REDACTED] for 2022 ([REDACTED] increase);
- Two consecutive years of net cash used by operating activities of [REDACTED] for 2023 and [REDACTED] for 2022 ([REDACTED] increase);
- Note Q – Subsequent Event (p. 22) indicates the school was placed on HCM2 in October 2023 by the Department as the school had a possible break in educational instruction from February 16, 2022 through April 23, 2023. Effective February 16, 2022, the school lost eligibility to participate in federal funding.

Upon review of the school's analysis, financial statements (internally prepared 2024, 2023 and 2022), and a description of the cash reserves and cash flow, the Commission raised serious concerns regarding the school's financial soundness and ability to continuously operate without access to Title IV federal funds. Despite CTI's assertion that it will continue to "adapt our strategies as needed" (*Id.*, pg. 21), the Commission questioned the limited description of these strategies and the likelihood of alternative funding sources, alternative revenue streams, and increased engagement with the local community (*Id.*, pg. 21).

Prior to the August 2024 meeting, ACCSC received notification from the school regarding the Department's determination that affirmed its decision of the school's ineligibility to participate in the Title IV program. The school stated that "it will continue with the appeal process, this time directly to the Administrative Actions and Appeals Services Group (AAASG), requesting a reversal of the decision..." (July 22, 2024 CTI notification, pg. 2).

Based on the foregoing, the Commission ultimately determined that CTI failed to demonstrate that the financial structure of the school is sound, 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*). Accordingly, the Commission directs CTI to submit the following:

- a. Internally prepared Q3 and Q4 financial statements for 2024 prepared in accordance with the requirements set forth in ACCSC's Instructions for the Preparation and Submission of Financial Statements and Related Information;
- b. A copy of the Department's final program review determination letter detailing the liabilities owed by the school;
- c. A description of the impact the Department's assessed liabilities will have on the operation of the effective continued operation of school;
- d. Any additional correspondence with the Department since the school's July 22, 2024 notification of the Department's final determination;
- e. An update regarding the school's intent to appeal the Department's determination of the loss of eligibility for Title IV;
- f. An updated Management Discussion and Analysis narrative examining the current financial condition of the school, addressing the school's ability to meet its obligations to students in a secure, reliable, and on-going fashion, and providing a more detailed update on the school's strategies for increased revenue;
- g. Documentation of the school's updated cash reserves and cash infusions for the entirety of 2024 (e.g. documentation of bank accounts, statements, transfers, etc. with account numbers redacted), ensuring all applicable documentation is accompanied by an English translation;
- h. Evidence that school notified students of the loss of Title IV eligibility; and
- i. Any additional information that the school believes will be useful to the Commission to demonstrate that the school is affirmatively in compliance with *Section I (C)(1), Substantive Standards, Standards of Accreditation*.

**Additional Areas of On-Going Concern:**

1. CTI must demonstrate successful student achievement by maintaining acceptable rates of student graduation (*Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation*). In response to the school's December 8, 2023 On-site Evaluation Report ("OER"), the school provided student achievement data using a January 2024 Report Date for the Cosmetology program and the Barbering & Styling program. The school noted that the Cosmetology program did not have data available and that the Barbering & Styling program had only one student who started but did not complete the program. In response to the Commission's May 1, 2024 Warning, the school was again required to submit student achievement data for the Cosmetology program and the Barbering & Styling program using a July 2024 Report Date, as well as the licensure examination pass rates for July 1, 2023 through January 1, 2024. Upon review of the school's response, the Commission noted that the school had no reportable data. The school stated "[f]or the Annual Report in 2024, CTI will not have beginnings to

report, as the reporting period coincided with the school relocation process” (June 28, 2024 CTI response, pg. 25). Additionally, the school noted that the Cosmetology and Barber & Styling programs did not have student cohort start dates until September 2023 and April 2023, respectively. Likewise, these two programs did not have graduates during the period from July 1, 2023 through January 1, 2024 to report licensure exam pass rates. As the school has not presented sufficient data to demonstrate successful student achievement in these programs, the Commission requires additional information, and directs CTI to submit the following:

- a. The school’s student achievement improvement plan for the Cosmetology program and the Barbering & Styling program specifically addressing any enhancements or modifications made in the following areas:
  - i. Admissions requirements and process;
  - ii. Curriculum and/or training equipment;
  - iii. Teaching methods and/or materials;
  - iv. Learning resources;
  - v. Student Services; and
  - vi. Career services and employer engagement;
- b. An assessment of the effectiveness of the school’s student achievement improvement efforts;
- c. An evaluation of current employment trends including an assessment as to when the Cosmetology program and Barbering & Styling program graduation and/or employment rates are expected to meet ACCSC’s benchmark rates;
- d. For each Cosmetology program and the Barbering & Styling program student who graduated from July 1, 2024 through January 1, 2025, indicate whether the graduate took the required examination and whether the graduate passed the exam:

Graduate ID	Program	Start Date	Graduation Date	Took Exam (Y/N)	Passed Exam (Y/N)

- e. The overall examination pass rate (number of graduates who took the exam divided by the number of graduates that passed the exam) for this program;
- f. For any program for which the reported rates of licensure do not meet the ACCSC benchmark, a description of the strategies being implemented to support graduate licensure rates and an assessment of the school’s progress toward meeting the Commission’s benchmarks;
- g. An analysis of retention improvement activities and an ACCSC Retention Chart<sup>2</sup> for the Cosmetology program and the Barbering & Styling program using a **January 2025 Report Date**;
- h. A Graduation and Employment Chart for the Cosmetology program and the Barbering & Styling program using **January 2025 Report Date**;<sup>3</sup>
- i. Summary information for each Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:

<sup>2</sup> Available on the [Forms and Reports](#) page of the ACCSC website.

<sup>3</sup> See the December 21, 2021 ACCSC [Accreditation Alert](#) regarding COVID-19 guidance for student achievement reporting effective for any Graduation and Employment Charts submitted with a January 2022 Report Date going forward.

i. For each student who started in the program, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Cosmetology	4/10/2023	5/01/2024	N/A
2	12346	Cosmetology	4/10/2023	N/A	7/15/2023

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>4</sup> (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification (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	Graduation 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	Graduation 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

j. 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. CTI must demonstrate that the school maintains records of graduate employment that contain sufficient information verifiable by third parties such as the Commission (*Section I (A)(1)(d)* and *Appendix VII (5), Substantive Standards, Standards of Accreditation*). The Commission’s May 1, 2024 Warning letter noted that the school’s employment verification documentation continued to be incomplete. In particular, the Commission noted records in which dates of initial employment preceded graduation dates; yet, these records do not appear to be appropriately classified as “Career Advancement,” and as such, lack the additional required elements. Further, the Commission previously noted that the school’s policy mirrors the requirements outlined in the *Standards of Accreditation*; however, the procedure as implemented does not appear to align with the school’s own policy. Additionally, the Commission questioned placements classified as “in-field,” wherein the record shows that while licensure is required for employment, the graduate did not obtain licensure and/or pass the licensure examination. In

<sup>4</sup> See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

response, the school explained that employers, with approved licenses, may hire graduates as assistants and assume the liability prior to the graduate attempting the licensure exam.

Additionally, the Commission directed the school to submit verification forms for the graduates who gained employment in the career field for which the school provided education between May 10, 2024 and June 10, 2024. Upon review of the school’s documentation, the Commission again noted that the school does not appear to be following its policy for employment verification. For example, the graduate documentation, as provided on pages 105 and 106, appears to include not only a career advancement verification from the employer, but also a regular employment verification from the graduate. The school’s policy requires written documentation from the employer or the graduate that (i) the training allowed the graduate to support or maintain the employment position due to training provided by the school or (ii) that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school. The career advancement form on page 106 contains the required certification for the career advancement classification for this graduate. The policy does not require the school to provide documentation from the employer *and* the graduate; yet, the documentation provided on page 105, from the graduate, indicates that the school classified this graduate as obtaining *regular* employment. At issue is that the documentation appears to show that the school applied two different verification processes for the same record, and as such, the Commission could not determine whether the school considers the graduate’s employment as career advancement or regular employment.

Moreover, it appears that the self-employment verification form does not include the employment start date, as seen in the example form on page 95, as well as the graduate verification form on page 103. Again, as noted in the school’s policy and the *Standards of Accreditation*, the employment classification must contemplate a reasonable period of time/ employment. Without the start date captured in each record, the school and the Commission cannot determine if the employment can be considered sustainable for records classified as “self-employment.” Although the school’s policy aligns almost verbatim with the requirements of the *Standards of Accreditation*, the school has not demonstrated the ability to implement and sustain the process as presented in the school’s responses.

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

- a. An updated description of the school’s process and procedures for recording and verifying graduate employment to include information for career advancement graduates;
- b. The school’s current employment verification form or other tool the school is currently utilizing to verify employment, and a description of any revisions made to the form(s);
- c. For each graduate who gained employment in the career for field for which the school provided education from October 1, 2024 to December 15, 2024, provide the following information:

Count	Graduate ID	Program	Start Date	Grad. Date	Date of Initial Employ.	Employ. Verification Date	Employer, Contact, Address & Phone #	Descriptive Job Title	Job Duties
1	12345	Cosmetology	9/1/21	10/15/24	11/15/24	12/15/23	Island Cuts, Gloria Cruz, 123 Calle Rio, San Juan, PR 787.333.1234	Hair Stylist	Hair Cuts, Stylist, Customer Intake

- d. The following supplementary information for each graduate identified in Chart (c.) 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 provided 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
- iv. For any of the above forms that include typed signatures, provide corresponding materials to support the validity of the electronic signature (DocuSign, Adobe Digital ID, email submission of form, etc.).

**Teach-Out Plan and Agreement Requirement:**

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an [Institutional Teach Out Plan Approval Form](#) and [Teach Out Agreement Approval Form](#) which must be submitted as part of the response for the items listed above **within 45 days** of the receipt of this letter.

**Notification to Students:**

Within **seven days** of receipt of the Probation notification and for the duration of that action, the school must (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*):

- a. Inform current and prospective students in writing that the school has been placed on Probation and the loss Title IV eligibility and provide such notice on the school’s website;
- b. Provide a summary that accurately describes the reasons for the Probation; and
- c. Provide the uniform resource locator (URL) where that action can be obtained from the Commission’s website.

**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*, the Commission may establish timeframes as deemed appropriate for an institution to demonstrate compliance with accrediting standards. Given the nature of the findings contained in this letter, and the history of the matter, the Commission at its February 2025 meeting can take an immediate adverse action to withdraw the school’s accreditation or to determine that additional time is warranted for the school to come into compliance with accrediting standards as set forth herein. The maximum timeframe allowed for CTI to achieve and demonstrate compliance with the *Standards of Accreditation* begins as of the date of this letter and will not exceed the timeframe established in *Section VII (M)(5), Rules of Process and Procedures, Standards of Accreditation*. However, please be advised that the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances and may establish shorter time frames as deemed appropriate or may take an adverse action prior to the expiration of the maximum timeframe.

### **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.

CTI 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.

CTI 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](#).

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<sup>5</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](#).

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 January 3, 2025**. 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 January 3, 2025**, 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 703.247.4525. 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]

Executive Director

c: [REDACTED]  
[REDACTED]

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<sup>6</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation.