



Accrediting Commission of Career Schools and Colleges

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October 4, 2024

ELECTRONIC DELIVERY

██████████
President
Paier College
84 Iranistan Avenue
Bridgeport, Connecticut 06604

School #M000242
Probation

Dear ██████████:

At the August 2024 meeting,¹ the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Paier College, located in Bridgeport, Connecticut, on Warning including the following:

- The Commission’s June 4, 2024 Warning Letter;
- Paier College’s July 2, 2024 Response;
- Paier College’s July 12, 2024 Response Additional Information;
- ACCSC’s June 13, 2024 Media Report Letter; and
- Paier College’s July 12, 2024 Response to the Media Report Letter.

Subsequent to the August 2024 meeting, the Commission received and reviewed the following at its September 2024 meeting:

- A copy of Paier College’s Employee Handbook, effective July 1, 2021 (“Paier College Employee Handbook”);
- A copy of the Connecticut Office of Higher Education (“CTOHE”) Paier College Evaluation Team Report – Renewal of Authorization Site Visit: September 5, 2024 (“CTOHE Site Visit Report”);
- A copy of Paier College’s CTOHE Reauthorization Evaluator Feedback Responses submitted to CTOHE on September 23, 2024 (Paier College Response to CTOHE Site Visit Report”); and
- A copy of CTOHE’s September 30, 2024 letter denying Paier College’s application for renewal of its certificate of authorization (“CTOHE Renewal of Authorization Denial”).

Upon review of the above, the Commission voted to place Paier College on **Probation with a subsequent review at the Commission’s November 2024 meeting.**

Required Responses:

- Page 22 of this letter contains required responses due no later than **October 15, 2024.**
- Pages 6-19 and pages 20-21 of this letter contain required responses due no later than **October 25, 2024.**

¹ By separate letter, dated August 13, 2024, the Commission voted to approve Paier College’s Application for a Change of Control – Part I with the requirement of a total reevaluation.

HISTORY OF THIS REVIEW:

May 2023 Review²

At its May 2023 meeting, the Commission directed Paier College to demonstrate that all owners,³ members of school management, and administrative employees have past records that demonstrate a commitment to: a) providing quality education to students; b) ethical, fair, and honest practice; and c) compliance with accrediting standards and applicable federal, state, and local requirements pursuant to *Section I (A)(2), Substantive Standards, Standards of Accreditation*. This standard also establishes that the Commission will consider an individual's affiliation with a school that has lost or been denied accreditation, entered into bankruptcy, or closed.

The Commission determined to learn more about the decision to precipitously close the Stone Academy campuses without an executable teach-out plan or agreement and Stone Academy's failure to fulfill its obligations to its students. A failure to demonstrate a commitment to a) providing quality education to students; b) ethical, fair, and honest practice; and c) compliance with accrediting standards and applicable federal, state, and local requirements would potentially render an owner ineligible to maintain ownership of an ACCSC-accredited school. Given these questions and concerns, the Commission voted to place Paier College on Warning and requested additional information regarding the school's compliance with accrediting standards.

September 2023 Review⁴

As stated in the Commission's December 13, 2023 letter, accrediting standards require that a school must demonstrate that all owners,⁵ members of school management, and administrative employees have past records that demonstrate a commitment to: a) providing quality education to students; b) ethical, fair, and honest practice; and c) compliance with accrediting standards and applicable federal, state, and local requirements pursuant to *Section I (A)(2), Substantive Standards, Standards of Accreditation*.

Paier College disagreed with the Commission's assessment that "Stone Academy campuses made a decision to close precipitously" (August 7, 2023 Commission Letter, pg. 3), stating that "it was not the decision of Stone Academy to close precipitously" (September 7, 2023 Paier College Response, pg. 2). Paier College contends that Stone Academy and ██████████ were prepared to afford its students a teach-out either internally or externally and offered such to the U.S. Department of Education, Connecticut Office of Higher Education, a potential teach out partner, and the Connecticut Attorney General's ("CT-AG") Office during calls that occurred on February 9, 2023 and February 10, 2023. Paier College stated that following the February 10, 2023 call, "the Attorney General's Office reached out to Stone's counsel and instructed ██████████ to notify our students that Stone would be closing by no later than February 24th" (*Id.*, pg. 5). Paier College asserted that Stone Academy continued to provide records to former students, that the state of Connecticut has stopped responding to student requests, and that the state of Connecticut was utilizing a teach-out partner originally proposed by Stone Academy and rejected by Connecticut. The school provided the requested attestations regarding owners' understanding of the Commission's requirements in the area of notifications and the provision of sufficient resources in the event of a decision to cease operations.

²The full details of the Commission's May 2023 review are contained within the Commission's August 7, 2023 letter.

³*Section I (A)(2), Substantive Standards, Standards of Accreditation* specifically states, "all owners" and therefore is not limited to majority owners and as such the Commission requires that any owner must meet the expectation and requirements set forth therein.

⁴The full details of the Commission's September 2023 review are contained within the Commission's December 13, 2023 letter.

⁵*Section I (A)(2), Substantive Standards, Standards of Accreditation* specifically states, "all owners" and therefore is not limited to majority owners and as such the Commission requires that any owner must meet the expectation and requirements set forth therein.

The Commission recognized Paier College’s contention that Stone Academy did not make the decision to close precipitously. However, given the lack of documentation to support the claim that Stone Academy was forced to close without regard to proper protocol or regulation, the Commission required documentation including the teach-out information proffered to the state of Connecticut to support that contention and provide a factual background as to the closure of Stone Academy. This point of contention notwithstanding, that the state of Connecticut would take such a drastic action to cause the immediate shut-down of a school speaks to the level of concern by state and the perceived need to protect students from improper conduct. The Commission also noted that while [REDACTED] may not have had a controlling interest in or day-to-day control over Stone Academy, the school noted that [REDACTED] “was privy to many of the strategic and operational decisions” and that “at times his opinions were solicited beyond October 2021” (*Id.*, pg. 2).

In response to both the precipitous closure of Stone Academy and the CT-AG’s Complaint against Stone Academy, Paier College, and [REDACTED], Paier College referenced that the school has undertaken court proceedings to dispute the actions and allegations of the state of Connecticut. While these proceedings are ongoing, they constitute circumstances that require the Commission’s heightened scrutiny. The Commission acknowledged the legal protections afforded to documentation used in court and in privileged communications and stated that any available documentation to support Paier College’s assertions would strengthen the school’s response. Given these questions and concerns, the Commission voted to continue Paier College on Warning and requested additional information regarding the school’s compliance with accrediting standards.

Connecticut Attorney General Complaint

Subsequent to the Commission’s May 2023 meeting, the Commission was notified of the CT-AG’s July 13, 2023 Complaint (“the Complaint”) against Stone Academy, [REDACTED], and Paier College. The Complaint specifically names [REDACTED] and Paier College and details allegations that raise questions regarding Paier College’s compliance with accrediting standards. Pursuant to *Section VII (D)(5)(a)(iv), Rules of Process and Procedure, Standards of Accreditation*, the Commission reviews and takes appropriate action under ACCSC’s *Rules* regarding the accreditation status of any school for which the Commission has received information that a school is subject to an investigation or legal action by a state agency with regard to a school’s adherence to state law or regulation.

These items in the CT-AG’s Complaint also contain allegations regarding operations at Stone Academy that raise questions as to [REDACTED] past record and commitment to a) providing quality education and b) ethical, fair, and honest practice (*Section I (A)(2)(a-b), Substantive Standards, Standards of Accreditation*). Specifically, the CT-AG’s allegations appear to include the hiring of unqualified faculty members under Connecticut law and the decision to stop taking attendance resulting in unverifiable clinical hours which rendered students ineligible for licensure.

The complaint also asserts that Paier College is liable for damages which raises questions regarding the ongoing financial soundness of the school and whether the school has resources sufficient for the proper operation of the school and the discharge of obligations to its students in light of the potential assignment of damages (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). Accordingly, ACCSC is interested in internally prepared financial documentation to demonstrate the financial structure and sufficient resources for the proper operation of the school.

The CT-AG Complaint contains further allegations regarding unfair and deceptive practices pursuant to [REDACTED] and Paier College’s aiding and abetting of those practices.

In regard to the CT-AG Complaint against Stone Academy, Paier College, and [REDACTED], Paier College disputes the complaint's allegations and alleges that the state is incorrectly citing regulations in several areas including marketing, funding, qualified staffing, and attendance. Similarly, [REDACTED] disputes the claims against him again stating that he had no day-to-day control over Stone Academy after October 1, 2021 and that Stone Academy received independent approvals after that date.

February 2024 Meeting

The ACCSC December 13, 2023 letter requested information regarding Stone Academy's closure and Teach Out plans offered to the state of Connecticut; updates regarding court proceedings and the CT-AG complaint against Stone Academy, Paier College, and [REDACTED]; an update as to the school's HCM2 and overall financial status; and the school's response to the anonymous complaint.

The Commission's review directed Paier College to demonstrate [REDACTED] past record and commitment a) to providing quality education and b) ethical, fair, and honest practice (*Section I (A)(2)(a-b), Substantive Standards, Standards of Accreditation*). The Commission acknowledged Paier College's submitted documents including the proposed teach out sent to the state of Connecticut which does not identify the proposed school. Additionally, the Commission noted that the cases against Stone Academy, Paier College, and [REDACTED] are ongoing. As these cases are ongoing, the Commission stated that Paier College must demonstrate that the school has the necessary and proper management and administrative capacity including individuals – administrators and owners alike – who possess past records demonstrating a commitment to providing quality education and ethical, fair, and honest practice.

The Commission also directed Paier College to demonstrate 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*). The Commission acknowledged Paier College's plans for continued and sustainable revenue in the face of HCM2 and the school's withdrawal from Title IV and stated its interest in the efficacy of those plans and the current status of the school's financial situation. Additionally, The Commission concurred with Paier College's assessment that educational quality must be maintained in the face of increased enrollments and is interested in updates as to the school's enrollment and its sustaining of the school's educational quality.

While the Commission acknowledged Paier College's response, the Commission determined that the past record and fitness of [REDACTED] and therefore Paier College's compliance with accrediting standards is informed by the results of ongoing court cases. Also, the changes to Paier College's finances given a decision to withdraw from Title IV created an ongoing need to evaluate the school's finances. Accordingly, the Commission voted to continue Paier College on Warning and requested additional information regarding the school's compliance with accrediting standards.

Subsequent to February 2024 Meeting

Subsequent to the Commission's February 2024 meeting, ACCSC became aware of a March 4, 2024 Press Release⁶ from the CT AG.

The Commission reviews and may take appropriate action as allowed under its *Rules* when it is aware of publicly available information (e.g., media, advertising, etc.) that appears to show or allege non-compliance with accreditation standards (*Section VII (D)(2), Rules of Process and Procedure, Standards of Accreditation*).⁷ This press release states that "the State has secured a \$5 million prejudgment remedy

⁶ <https://portal.ct.gov/ag/press-releases/2024-press-releases/attorney-general-tong-secures-prejudgment-remedy-in-case-against-stone-academy>

⁷ As promulgated in the [January 2, 2024 Accreditation Alert](#).

against Stone Academy” and contains the Order Regarding: 07/13/2023 101.00 Notice of Application for Prejudgement Remedy / Hearing (JD-CV-53⁸ (“the Order”)) (March 4, 2024 CT AG Press Release).

The Order raises serious questions as to [REDACTED] past record of compliance with state laws and regulations regarding CUTPA and Stone Academy’s obligation to provide an acceptable teach out to the state. These questions are serious and call into question the propriety of [REDACTED] in his current position at Paier College. Additionally, given the \$5 million prejudgment remedy and the possibility of a civil penalty provision of \$5,000.00 per violation, in a June 4, 2024 letter ACCSC expressed its interest in reviewing the availability of those funds and any potential impact to the financial soundness of the school and its ability to meet its obligations and to students in an ongoing and sustainable manner as required under *Section I (C)(1), Substantive Standards, Standards of Accreditation*.

August 2024 Meeting and Review

Through the Commission’s decision to approve Paier College’s Application for a Change of Control-Part I and associated waiver request with the added requirement of a total reevaluation, the Commission accepted Paier College’s response regarding the fitness of [REDACTED]. This acceptance was based heavily upon the Commission’s understanding that as part of the ownership, management, and administrative structure described in the school’s Application for a Change of Control-Part I, [REDACTED] would have no ownership, management, or administrative role at the school. Given [REDACTED] named status in Connecticut suits and the prejudgment remedies, the Commission has serious concerns with regard to [REDACTED] fitness as a continued owner, manager, or administrator of the school. Subsequent to the Commission’s written notice of these concerns, the school submitted an Application for a Change of Control. As that proposed change of control and the associated transaction have not yet been effected, the Commission’s concerns remain and are now heightened based on the added elements which have since come to light and as expressed in this letter.

Accordingly, despite the approval of the Application for a Change of Control-Part I, the Commission remains concerned as to whether Paier College meets its requirement to ensure that its owners’, members of school management’s, and administrative employees’ past records that demonstrative a commitment to providing quality education to students, ethical, fair, and honest practice, and compliance with accrediting standards and applicable federal, state, and local requirements (*Section I (A)(2)(a-c), Substantive Standards, Standards of Accreditation*). The following are the areas of ongoing concern expressed by ACCSC at its August 2024 meeting.

1. Paier College must demonstrate successful student achievement by maintaining acceptable rates of graduate employment in the career field for which the school provided education (*Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation*). The June 4, 2024 Warning indicates discrepancies within backup documentation submitted as part of the school’s April 25, 2023 Response and the programs with below benchmark rates as part of the 2023 Annual Report. As such, the June 4, 2024 Warning directed the school to submit an explanation of the school’s student achievement improvement efforts along with an assessment of the effectiveness of the school’s improvement efforts and Graduation and Employment Charts using a July 2024 Report Date along with supporting summary information.

Paier College’s July 2, 2024 Response does not include a narrative but rather simply references “Exhibit 3: ACCSC Recent Cohort Rates,” (pg. 2). Exhibit 3 included Graduation and Employment Charts with July 2022 dates for the 12-month Fine Arts (Certificate), 47-month Fine Arts (BFA), 8-month Graphic Design (Certificate), 47-month Graphic Design (BFA), and 12-month Interior Design (Certificate)

⁸ https://portal.ct.gov/-/media/ag/press_releases/2024/prj-ruling-states-case.pdf

along with Graduation and Employment Charts with January 2023 dates for a 47-month Photography Bachelor’s program and 24-month Photography Associate program. However, the information provided does not include Graduation and Employment Charts using a July 2024 Report Date as directed by the June 4, 2024 Warning. In addition, Paier College did not provide an explanation of the school’s student achievement improvement efforts or the summary information for the submitted Graduation and Employment Charts.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. An explanation of the school’s student achievement improvement efforts along with an assessment of the effectiveness of the school’s student achievement improvement efforts;
- b. A Graduation and Employment Chart for Photography and Digital Imaging (BFA), Photography (AFA), Illustration (BFA), and Interior Design (BFA) programs using a **July 2024 Report Date**;⁹
- c. 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 who started in the program, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Interior Design	11/01/2021	12/15/2022	N/A
2	12346	Interior Design	11/01/2021	N/A	7/01/2021

- 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 field¹⁰ (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Graduation 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

⁹ 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.

¹⁰ See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

- d. 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. Paier College must demonstrate that the school supports student achievement rates through the school's verifiable records and documentation of initial employment of its and that the employment classifications are appropriate and reasonable based on the educational objectives of the program (*Section VII (B)(1)(b) & Appendix VII, Substantive Standards, Standards of Accreditation*). The June 4, 2024 Warning summarizes the findings of the on-site evaluation team as listed in the March 11, 2023 OER to include that employment classifications do not appear to align with the program objectives as published in the school's catalog and that the independent third-party "verified as not correct" 3 of 11 (27%) of the records provided. Additionally, the June 4, 2024 Warning indicates concerns with the most recent initial employment records provided in the school's April 25, 2023 Response to include initial start dates prior to the program start date; missing attestations for the self-employed graduates; plans for the future rather than completed freelance work; and a questionable job title of Paraprofessional II as an in-field placement for a graduate from the Interior Design program. As such, the June 4, 2024 Warning directed the school to provide a description of the school's process and procedures for recording and verifying graduate employment and information and backup documentation for 10 graduates who gained employment between June 1, 2024 and July 1, 2024.

Paier College's July 2, 2024 Response references "Exhibit 4: Sample of placement verification forms" (pg. 2). However, the school's response does not include a description of the school's process and procedures for recording and verifying graduate employment to include information for self-employed graduates or the school's current verification form or other tool used to verify employment. In reviewing the six sample placement verification forms, the Commission noted issues with each form as follows:

- The placement form for [REDACTED] indicates that the graduate is self-employed without the necessary attestations required by *Appendix VII, Standards of Accreditation*;
- The Continuing Education Form for [REDACTED] does not include any documentation of the continuing education;
- The placement form for [REDACTED] includes a Job Title of Intern which does not clearly indicate that this employment is in-field and sustainable;
- The placement form for [REDACTED] includes a Job Title of Realtor which does not clearly indicate that this employment is in-field;
- The placement form for [REDACTED] lists an employment start date of May 2023, prior to the program graduation date of June 2024 without documentation of career advancement;
- The placement form for [REDACTED] lists an employment start date of June 2023, prior to the program graduation date of June 2024 without documentation of career advancement; and
- All six of the forms submitted are completed and signed prior the graduation date for each student;

The Commission noted that the June 4, 2024 Warning also includes concerns regarding self-employment, missing attestations, and questionable job titles and that the school does not appear to have implemented updated processes and procedures.

As such, the Commission directs Paier College to submit the following:

- a. A description of the school’s process and procedures for recording and verifying graduate employment to include information for self-employed graduates;
- b. The school’s current verification form or other tool described in (a.) above used to verify employment;
- c. For 10 graduates who gained employment in the career for field for which the school provided education from October 15, 2024 to November 30, 2024, provide the following information:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title	Job Duties
1	12345	Interior Design	9/1/23	9/10/24	Interior Design Firm, Sally Smith, 123 Sample Way, Anywhere, VA 222.333.1234	10/15/24	Interior Designer	Interior Design Projects for Customers providing layout, fabric, color, and furnishing options.

- d. The following supplementary information to include the corresponding Graduate ID for each graduate identified in the 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 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
 - 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.); and
 - e. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
3. Paier College must demonstrate that all monies paid by an applicant are refunded if requested within three days after signing an enrollment agreement and making an initial payment. (*Section I (D)(4)(b), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the team found that school’s catalog referenced a \$25 non-refundable application fee that was not refunded if a student cancelled within three days. In response to the March 11, 2023 OER, Paier College updated the catalog to reflect the school’s policy of maintaining a non-refundable application fee. The June 4, 2024 Warning notes that maintaining a non-refundable application fee is in conflict with accrediting standards that state that an applicant requesting cancellation within three days after signing an enrollment agreement and making an initial payment is entitled to a refund of all monies paid by the applicant. The June 4, 2024 Warning directed the school to update the cancellation policy.

In response to the June 4, 2024 Warning, Paier College did not include a narrative but provided a sample of three-day refunds. However, the exhibit only includes a list of six students without any documentation to demonstrate that the refund occurred on the refund date listed. In addition, none of the six students appear to have cancelled the enrollment within three days of signing the enrollment agreement. Moreover, the school did not include a copy of the current catalog or current enrollment agreement as part of the July 2, 2024 Response and, therefore, did not clearly demonstrate that the policy has been updated.

As such, the Commission directs Paier College to submit the following:

- a. An updated copy of the school’s refund policy as published in the catalog and enrollment agreement to align with accrediting standards;
 - b. A list of any student who cancelled their enrollment within three days since June 4, 2024, alternately, if no student has cancelled their enrollment within three days, a description of the process and procedure the school will utilize if a student cancels their enrollment in the future;
 - c. Documentation of the return of all monies for any application who cancelled their enrollment within three days per the list in (b.) above; and
 - d. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
4. Paier College must demonstrate compliance with accrediting standards relative to admissions practices as follows:
- a. Paier College must demonstrate that it executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, the team found that when students withdraw and choose to re-enroll at a later date, the school and student execute a “Change in Status Form,” but do not execute an updated enrollment agreement. Likewise, after enrolling, if a student chooses to postpone enrollment or pursue another program, the school utilizes this same form in lieu of executing an updated enrollment agreement.
 - b. Paier College must demonstrate that prior to enrollment the school determines that an applicant meets the school’s admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*). Specifically, the evaluation team found that the school’s enrollment agreement contains fields to denote “college acceptance date,” followed by signature and date lines for the President, Student, and Authorized Paier College Representative. Upon review of the dates and signatures noted in the enrollment agreements, it was not clear when the school considers students to be accepted/enrolled, and if this determination is made prior to the student demonstrating that all admissions criteria have been met.
 - c. Paier College must demonstrate that the school furnishes to the student prior to the student starting class, a final copy of the enrollment agreement signed by both parties (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*). Specifically, during the on-site evaluation, upon review of current student files, the team noted that the school may have been accepting students into the school after the start date, or the documentation did not make clear when the enrollment agreement was fully executed. Further, for students that withdrew and then re-enrolled, the school did not appear to execute new enrollment agreements, and as such did not furnish the student with fully executed updated enrollment agreements.

- d. Paier College must demonstrate that a school shall not permit 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*). The evaluation team noted that the enrollment agreement requires signatures from both the President, [REDACTED] and an additional school admissions representative. As such, the documentation did not make clear which personnel is responsible for signing and accepting the enrollment agreement. Additionally, upon review of a draft of the enrollment agreement and a sample of executed enrollment agreements, [REDACTED] signature appears to be pre-populated. As such, it appears as though [REDACTED] signature is not indicative of his assessment that prospective students meet the admissions requirements, and as such, admissions personnel appear to be in fact making enrollment decisions.

In response to the March 11, 2023 OER, the school stated that its “policy regarding reenrollments and changes of programs has been updated” and that “we have now changed our policy to include a new enrollment agreement for all reenrollments and for all students who have a change of program” (April 11, 2023 Paier College Response, pg. 9). However, the response does not include any documentation to demonstrate the implementation of this updated policy. Additionally, the April 11, 2023 Response provided conflicting information regarding who signed the enrollment agreement and whether this was done by the Provost or the Reviewing Coordinator. In addition, in reviewing the enrollment agreements and admission documentation provided as part of the April 11, 2023 Response, the Commission found that some enrollment agreements appear to be signed by the accepting school official prior to receiving all necessary admission documentation. Lastly, the enrollment agreements provided as documentation in the April 11, 2023 Response do not appear to include pagination by providing the page number and the total number of pages in the agreement (i.e., Page 1 of 5, Page 2 of 5, etc.) as required by Item #19 on the ACCSC Enrollment Agreement Checklist. Therefore, the June 4, 2024 Warning directed the school to provide admissions policies and procedures and a list of students enrolled between June 1, 2024 and July 1, 2024 along with the documentation that the school relied upon to determine that the student had met the admission requirements prior to enrollment.

In response to the June 4, 2024 Warning, Paier College stated that “[a]ll students are required to complete an enrollment agreement” (July 2, 2024 Paier College Response, pg. 2) and submitted a sample of completed enrollment agreements. However, the Commission noted that these enrollment agreements were completed in the in 2020, 2021, 2022, and 2023 and, therefore, do not demonstrate that Paier College has updated the school’s admissions policies and procedures in compliance with accrediting standards.

Further, Paier College’s July 2, 2024 Response states that:

Students complete an interview where the admission requirements are disclosed. We also have a checklist for files to ensure that all documents are received before the add/drop period. Our registrar audits the file to ensure that every student has met the admissions requirements, all documents are in file in our lock meeting which occurs 5 days before the end of add/drop period (July 2, 2024 Paier College Response, pg. 2).

While the school submitted a copy of a file checklist, the response does not include documentation to demonstrate implementation of the file checklist. With regard to furnishing a copy of enrollment agreement to students prior to the student starting class and a final copy when the enrollment agreement is signed by both parties, Paier College states that:

All students are given a copy of the enrollment agreement with a folder with other important school information. A copy of the enrollment agreement is always available to pick up at the students' request by visiting the student records office (Id., pg. 2).

However, this explanation does not clearly describe whether the copy provided in the folder is a fully executed copy of the enrollment agreement and whether this folder is provided to students prior to starting classes. With respect to demonstrating that the school does not permit 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, Paier College stated that:

We have a streamlined process; we have two admission representatives whose primary role is to recruit students. After a student is enrolled, they go through a 2nd interview with the Director of Admissions. Upon conditional acceptance which only the Director of Admission is allowed to provide the file is sent to the President who signs off and awards the official acceptance (Id., pg. 3).

The Commission noted that this response appears to indicate that a student is considered “enrolled” prior to completing all admissions requirements as the second interview with the Director of Admissions is done after being enrolled. In addition, a conditional acceptance is completed by the Director of Admissions, however, the *Standards of Accreditation* state that a school must have a policy and procedure for ensuring that admission documentation is secured prior to fully executing the enrollment agreement and that this interpretation applies equally to “conditional” periods of enrollment. Further, if the Director of Admission is granting conditional acceptance, it appears that the school continues to permit personnel whose primary responsibilities include admission activities to become involved in admission decisions.

As such, the Commission directs Paier College to submit the following:

- a. A copy of the school’s enrollment agreement cross-referenced to the ACCSC Enrollment Agreement Checklist;
- b. A copy of the school’s admissions policies and procedures, specifically identifying the school official responsible for signing and accepting the enrollment agreement, detailing a timeline/ order of events;
- c. A list of all students enrolled between July 1, 2024 and November 30, 2024 in the following format:

Student ID#	Program	Date Admissions Documentation Secured	Date Enrollment Agreement signed by Student	Date Enrollment Agreement Signed and Accepted by School	Name and Role of Accepting School Official	Class Start Date

- d. A copy of the executed enrollment agreement for each student included in the list in (c.) above;
 - e. Copies of the admissions documentation that the school relied upon to determine that the students identified above had met the admissions requirements prior to enrollment; and
 - f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
5. Paier College must demonstrate that that the school consistently ensures all graduation requirements are met prior to graduating as published in the school’s catalog (*Section I (D)(6), Substantive Standards, Standards of Accreditation*). During the on-site evaluation, upon review of 9 graduate transcripts, the

team noted that the school classified two students as graduates prior to their meeting the credit hour requirement for graduation. In response to the March 11, 2023 OER, Paier College stated that the two students identified during the on-site evaluation had meet the requirements but that their records had been entered into the school's SIS system incorrectly and that the school has a rigorous process for determining that all graduation requirements are met to include transcript audits.

However, in reviewing the transcripts for 10 recent graduates included as part of the April 11, 2023 Response, the Commission found the transcript for [REDACTED] indicates that the student earned 126 credits for the Bachelor of Fine Arts-Graphic Design program that is approved at 130 credits. As such, the school did not clearly show that the transcript audit is ensuring that all graduation requirements are met. Therefore, the June 4, 2024 Warning directed the school to provide an audit of transcripts for graduates since the on-site evaluation; a narrative regarding what the school has done to rectify transcripts; a list of the 10 most recent graduates along with a copy of each graduate's transcript.

In response to June 4, 2024 Warning, Paier College stated that:

We complete a graduation clearance exit form on all students. Our Provost along with our registrar reviews a student's file and completes the graduation clearance form to ensure that all graduation requirements have been met (Id., pg. 3).

While the response includes a copy of the Graduation Application, the form is blank and therefore does not demonstrate implementation of the policy. In addition, the school's July 5, 2024 Response to the Media Report correspondence to Connecticut indicates that "[n]ew management noticed there was a lack of communication and deliverance for student records" (July 5, 2024 Paier College Response to Media Report, pg. 9). The correspondence to Connecticut further states that the school is in the process of implementing Parchment and that the school continues to work diligently to response to all student requests for transcripts or any other education record.

As the school did not provide an audit of transcripts for graduates since the on-site evaluation; a narrative regarding what the school has done to rectify transcripts; a list of the 10 most recent graduates along with a copy of each graduate's transcript, it was unclear that the school consistently ensures all graduation requirements are met prior to graduating as published in the school's catalog.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A description of the school's process and procedures to consistently ensures all graduation requirements are met prior to graduating as published in the school's catalog;
 - b. An audit of transcripts for graduates since the on-site evaluation along with the number of transcripts incorrectly entered in the school's system;
 - c. A narrative regarding what the school has done to rectify transcripts (e.g., reprinting transcripts and providing them to graduates);
 - d. A list for the 10 most recent graduates;
 - e. Copies of the transcripts and any graduation clearance forms for the graduates identified in (d.) above; and
 - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
6. Paier College must demonstrate that the school is attentive to its students' educational and other needs as a means to support retention, maintains written policies and procedures addressing student services,

and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). Results from the student survey conducted during the evaluation indicated the following:

- 33% dissatisfaction with regards to admissions;
- 26% dissatisfaction with financial aid;
- 23% dissatisfaction with academic progress
- 48% dissatisfaction with student services;
- 36% dissatisfaction with library/learning resource system;
- 40% dissatisfaction with the facility;
- 37% dissatisfaction with training equipment;
- 36% do not feel good about their decision to attend the school; and
- 50% would not recommend the school to a friend.

In response to the March 11, 2023 OER, Paier College conducted surveys and interviews with current students; a comprehensive review of the existing learning resource system; and focus groups. Based on the findings from these methods, the school added resources and created additional opportunities for student among other strategies to address concerns related to student services, learning resource systems, and student satisfaction.

Although the Commission acknowledged the initiatives which Paier College indicated it has implemented to improve student satisfaction, the response does not adequately and clearly show whether student satisfaction has improved or if dissatisfaction currently persists. Specifically, the school survey results for only 30 students, as compared to the population during the on-site evaluation of 192, is not substantially similar to the ACCSC survey, and does not address the areas of facilities, training equipment, whether the student feels good about their decision to attend the school, and whether the student would recommend the school to a friend. In addition, only 73% expressed agreement with the statement “I feel safe when at school.” Additionally, while the survey indicates that students answered non-Likert scale questions such as “What services would you like to see in the Library,” these answers were not included in the response. Therefore, the June 4, 2024 Warning directed the school to submit a description of any changes implemented and a student survey along with an analysis of the results.

In response to the June 4, 2024 Warning, Paier College provided copies of student services awareness flyers and stated that:

Please note we have a student & placement services coordinator who will be the point of contact for all students and will be the students advocate on the campus. Our written policies & procedures for student services are outlined in our catalog & student handbook (Id., pg. 3).

However, the response does not include a description of any changes or action taken by the school along with documentation of those changes and actions nor evidence and documentation that the school completed an additional student survey. As such, the response continues to not adequately and clearly show whether student satisfaction has improved or if dissatisfaction currently persists.

As part of the school’s July 5, 2024 Response to the Media Report, Paier College’s correspondence to Connecticut states that “[n]ew management recognized very quickly the lack of student services at the

college and we took immediate action” (July 5, 2024 Paier College Response to Media Report, pg. 9). The response indicates that the school’s Deans will be responsible for academic advising but does not include any further details related to other student services. Additionally, although the July 5, 2024 Response specifies that a copy of the survey results are provided within the Connecticut communication, the correspondence states that “[o]nce students return in the fall student surveys will be completed quarterly to ensure progress in satisfaction” (*Id.*).

Despite the information provided in response to the June 4, 2024 Warning and June 13, 2024 Media Report letter, it was unclear that school is attentive to its students’ educational and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. The school’s policies and procedures addressing student services;
 - b. A description of any changes implemented, or action taken by the school in response to the responses to the internal student survey regarding whether students feel safe at school and any documentation as to those changes and actions;
 - c. A description of the student survey process (e.g., how and when the surveys were distributed and collected) for at a minimum 50% of the student population, using the ACCSC student survey;
 - d. A detailed analysis of the student survey results—including a comparison of the results with those from the last ACCSC survey—with a particular focus on any results that show less than 80% satisfaction;
 - e. A summary of any trends, isolated incidents, or general problems extracted from the student survey analysis;
 - f. A detailed narrative of the school’s plan to address any areas of student dissatisfaction, if applicable, and any other information to support the efforts made to enhance a student’s experience at the school; and
 - g. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
7. Paier College must demonstrate compliance with accrediting standards relative to faculty as follows:
- a. Paier College must demonstrate that faculty teaching technical and occupationally related courses in an academic associate or baccalaureate degree program have a minimum of four years of related practical work experience in the subject area(s) taught and possess a related degree at least at the same level of the course the faculty member is teaching. (*Section III (B)(7), Substantive Standards, Standards of Accreditation*). As the school did not appear to have a consistent process for verifying prior work experience for faculty, the team could not assess whether the faculty met this requirement. Additionally, for faculty members [REDACTED] and [REDACTED], the school could not produce transcripts to show the education requirements were met. Finally, six other faculty demonstrated on resumés experience limited to teaching.
 - b. Paier College must demonstrate that at a minimum, at least 50% of graduate level courses included in the master’s degree programs are taught by faculty members who possess a minimum of four years of related practical work experience and an earned doctorate degree or other terminal degree in a related field of study (*Section III (B)(10)(a), Substantive Standards, Standards of Accreditation*). Out of 7 faculty in the Master’s Degree programs, only 3 had doctorate degrees.

Additionally, the documentation did not make clear that all faculty could demonstrate the required practical work experience.

- c. Paier College must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). Upon review of thirty-seven faculty files, the team noted evidence of verification of prior work experience, both practical and academic, for only three of the current faculty.

In response to the March 11, 2023 OER, Paier College provided a list of 31 current faculty, however, the list appears to only include faculty members with last names from A to N. In addition, the response states that the school switched to Paycom to verify the previous employment of employees. The response, however, did not include any documentation to demonstrate the use of Paycom to complete a verification of prior work experience for all faculty members and administrators. Additionally, as the school did not include the verification of prior work experience, it was unclear that all faculty members are qualified to teach technical and occupationally related courses in an academic associate or baccalaureate degree program.

With regard to demonstrating that at a minimum, at least 50% of graduate level courses included in the master's degree programs are taught by faculty members who possess a minimum of four years of related practical work experience and an earned doctorate degree or other terminal degree in a related field of study, the response refers to the documentation of Enhanced Background Checks that are available from Paycom but does not provide any information to demonstrate these background checks have been completed. In addition, the response includes documentation that the State of Connecticut Office of Higher Education provided a faculty waiver in 2022 for [REDACTED] to teach Photography and an internal memo in 2000 from the Vice President to Human Resources that the BFA requirements have been waived for [REDACTED], however, this documentation does not supersede the requirements of the accrediting standards. Therefore, the June 4, 2024 Warning directs the school to submit a roster of faculty, documentation to demonstrate that each faculty member possesses the appropriate academic credentials, and evidence that faculty prior work is verified.

In response to the June 4, 2024 Warning, Paier College stated that:

We verify employment by requesting that all faculty with assignments to teach in the upcoming term submit notarized documentation. This way our faculty is affirming to the notary that all the information on the resume is true and correct (Id., pg. 4).

The response includes a list of 29 faculty members along with a notarized resumé and notarized portfolio sample for one instructor. Additionally, it was unclear how having the faculty member submit notarized resumé and portfolios demonstrates that the school verifies prior work experience and maintains appropriate academic credentials.

The school's July 5, 2024 Response to the Media Report states that "[w]e have requested notarized resumé since having a document notarized is the same as swearing under oath in a court of law—you are saying that the facts contained in the document are true" (July 5, 2024 Paier College Response to the Media Report, pg. 3). However, this process does not demonstrate that the school verifies prior work experience nor that the school completes an assessment to demonstrate each faculty member has the appropriate credentials and related practical work experience, as applicable. Additionally, while the July 5, 2024 Response to the Media Report indicates that the school has not renewed the contracts for the fall term, the July 18, 2024 response to Connecticut included within the July 5, 2024 response to ACCSC states that "[a]ll faculty do meet the 4 years of practical experience in the field and a degree

equal to or higher than the level being taught” (July 5, 2024 Paier College Response, pg. 8). However, it is unclear how Paier College can state that all faculty members meet the years of practical experience and academic credentials when the correspondence to Connecticut also states that the school was still in the process of reaching out to each faculty member individually and expected to have all contracts signed by the end of the week of July 12, 2024.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A roster of faculty for the degree programs;
 - b. The documentation that the school relied upon to demonstrate that the faculty noted in item (a.) above met the requirements for technical and occupationally related courses in an academic associate or baccalaureate degree program, including documentation of academic credentials;
 - c. Documentation to demonstrate that the faculty teaching in Master’s Degree programs have the appropriate qualifications individually or a sufficient combination of qualifications overall;
 - d. Evidence that faculty prior work is verified; and
 - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
8. Paier College must demonstrate that the school’s Program Advisory Committees (“PAC”) review and comment at least annually on all required areas, that the school gives consideration to PAC input, or that for each master’s degree program/ program area, the PAC includes at least two individuals with graduate level experience (*Section II (A)(4)(b)(i)* and *Appendix III, Substantive Standards, Standards of Accreditation*). Specifically, the minutes provided to the evaluation team did not show sufficient detail regarding the description of members/attendees. Minutes also did not include sufficient and comprehensive detail of the curriculum, the program, adequacy of program objectives, program length, curriculum content, learning resources, facilities and equipment, and student achievement.

In response to the March 11, 2023 OER, Paier College provided PAC meeting minutes from 2021 and 2022 along with the scheduled PAC meetings for 2023. While the April 11, 2023 Response also includes a list of PAC members with qualifications for most program areas, not all lists clearly identify which programs the members are qualified to review. In addition, the PAC members as listed on the meeting minutes do not always match the PAC lists provided, and the meeting minutes do not always provide the qualifications for the PAC members in attendance. Additionally, not all PAC meetings appeared to cover all areas (e.g., the learning resource system and student achievement rates). Therefore, the June 4, 2024 Warning directed the school to submit information for all PAC meetings held in 2023 and 2024.

In response to the June 4, 2024 Warning, Paier College stated that “[w]e have a new template that outlines the required topics to address and discuss during a program advisory session to ensure all area(s) have been met” (*Id.*, pg. 4). While the school provided a copy of the new template, the template is blank and therefore, does not demonstrate implementation of the new template.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A list of the school’s PACs by program/program area and all corresponding members;
- b. Written and detailed minutes of all PAC meetings held in 2024 that include:
 - i. A description of all members in attendance (i.e., titles and affiliations);

- ii. An annotation as to which PAC members represent the employment community, and which are qualified to review delivery of distance education; and
 - iii. The date, time, and location of the meeting(s);
 - c. A comprehensive and clear description of the review of and commentary made by PAC members in compliance with *Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation* (the school is reminded that PAC review and comment activities must include all items outlined in *Appendix III, Substantive Standards, Standards of Accreditation*);
 - d. Evidence to show that the school gives consideration to the input of the PAC;
 - e. A schedule for any future Program Advisory Committee meetings; and
 - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
9. Paier College must demonstrate that the school's catalog contains all items required by the ACCSC Catalog Checklist (*Section IV (C)(1)(a), Substantive Standards, Standards of Accreditation*). Upon review of the catalog, the evaluation team noted discrepancies in the credit hours awarded as compared to ACCSC approvals. In response to the March 11, 2023 OER, Paier College provided a copy of the catalog cross-referenced to the ACCSC Catalog Checklist. However, in reviewing the credits listed in the catalog on page 844 of the response, the Commission continued to note discrepancies in the number of credits listed. As such, the June 4, 2024 Warning directs Paier College to provide an updated catalog cross-referenced to the ACCSC Catalog Checklist. In response to the June 4, 2024 Warning, the school provided a copy of the ACCSC Catalog Checklist but did not provide a copy of the current catalog. Therefore, the Commission directs Paier College to provide an updated catalog fully cross-referenced to the ACCSC Catalog Checklist.
10. Paier College must demonstrate that the school's physical facilities must be sufficient to create an effective and suitable learning environment (e.g., size, resources, safety, etc.) (*Section I (G)(2), Substantive Standards, Standards of Accreditation*). In response to the Commission's June 13, 2024 Media Report letter, Paier College states that:

In the past three years these projects have included a new roof for the entire building, a re-mortaring of the brick façade, a replacement of multiple heating and cooling systems in the past year at a cost of ██████████, the development of 12 new office spaces and 3 new classrooms, and breaking ground on the creation of a new 2,000 square foot design laboratory (July 5, 2024 Paier College Media Report Response, pg. 4).

Additionally, the correspondence with Connecticut included within the July 5, 2024 Media Report Response states that:

- a. *The issues within the facilities with cooling/heating have been addressed and resolved. Please note that these were different units and issues that happened simultaneously, and we did our best in hiring a contractor to come out and fix urgently.*
- b. *We have implemented new policies on dormitory inspections and our resident agents will make sure that rooms are habitable. Deans & programs chairs have been assigned duties to ensure the cleanliness of the classrooms/labs.*
- c. *We will be adding a café for students and staff on the 9th floor so that students may be able to purchase quick meals during business hours (Id., pg. 8).*

However, the July 5, 2024 Media Report Response does not include any documentation to demonstrate that these repairs are completed.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A narrative of how the school’s physical facilities are sufficient to create an effective and suitable learning environment;
 - b. A comprehensive and clear description of the repairs and updates to the school’s facilities;
 - c. Evidence to show that the school has made the repairs and updates to the school’s facilities;
 - d. A schedule for any future updates to the school’s facilities; and
 - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
11. Paier College must demonstrate that in order for a school to maintain its eligibility for accreditation, the school maintains continuous operation as a school providing education and training to students in accordance with its primary educational objectives and maintain its ability to meet its obligations to students on an ongoing basis (*Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*). The July 5, 2024 Response to the Media Report indicates that:

Paier College is currently on summer break and is primarily focused on administrative items including sending out and confirming annual contracts for the upcoming year (Id., pg. 4).

However, the response does not include information as to how Paier College continues to operate as a school. Further, the response does not include any information as to how this is impacting student progress within their programs based on the fully executed enrollment agreements. Moreover, the response does not include information as to how the school is maintaining the ability to meet obligations to students on an ongoing basis.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A narrative of how the Paier College continues to operate as a school;
 - b. A comprehensive and clear description of the impact this break has had on student progress;
 - c. A list of students the school anticipates returning upon completion of the break;
 - d. A schedule for the upcoming term for the students listed in (c.) above; and
 - e. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
12. Paier College 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*). The Commission previously acknowledged Paier College’s plans for continued and sustainable revenue in the face of HCM2 and the school’s withdrawal from Title IV and noted the Commission’s interest in the efficacy of those plans and the current status of the school’s financial situation. Paier College submitted the school’s FYE June 30, 2023 and 2022 audited financial statements in its July 2, 2024 Response and unaudited interim financial statements as of June 2024 in its July 18, 2024 response.

A review of the submitted FYE June 30, 2023 and 2022 audited financial statements showed the following:

- A contingency (Note #15) relating to Paier College’s status as a related party in a Connecticut case under the Connecticut Unfair Trade Practices Act where the school’s counsel asserted that a potential outcome or liability cannot be determined at this point;
- Two consecutive years of a net loss of [REDACTED] for 2023 and [REDACTED] for 2022 ([REDACTED] decrease); and
- Two consecutive years of net cash used for operating activities of [REDACTED] for 2023 and [REDACTED] for 2022 ([REDACTED] decrease).

A review of the school’s interim unaudited financial statements as of June 2024 showed the following:

- A deficit in equity of [REDACTED];
- A net loss of [REDACTED]; and
- Accounts receivable and payable from related parties including a payable to Stone Academy.

With consecutive years of net loss, multiple accounts receivable and payable from related parties including a payable to the closed Stone Academy, the Commission is interested in the most up-to-date information regarding the school’s financial status and a full accounting of the school’s related party transactions. Additionally, given the appearance of three consecutive years of net loss, the Commission is interested in an update as to Paier College’s strategy for financial stability.

Accordingly, the Commission will review Paier College’s FYE June 30, 2024 audited financial statements when they are submitted to ACCSC and additionally requests a detailed Management Discussion and Analysis of the school’s plans for financial stability as well as any additional information the school believes will assist the Commission in making a determination regarding the school’s compliance with accrediting standards.

September 2024 Meeting and Review

Subsequent to the August 2024 meeting and review, the Commission received Paier College’s Employee Handbook, CTOHE September 5, 2024 Site Visit Report, Paier College September 23, 2024 Response to CTOHE Site Visit Report, and CTOHE September 30, 2024 Renewal of Authorization Denial letter.

CTOHE’s Renewal of Authorization Denial states that the Commissioner “has denied Paier College’s application for renewal of its certificate of authorization” (September 30, 2024 CTOHE Renewal of Authorization Denial Letter, pg. 1).

ACCSC’s *Rules for Institutional Eligibility and Obligations of an Institution to Maintain Eligibility for Accreditation* state the following:

- In order for a school to maintain ACCSC accreditation, a school must have all necessary authorizations from the state(s) in which it operates and maintain compliance with all applicable local, state, and federal requirements (*Section I (D)(4)(b), Rules of Process and Procedure, Standards of Accreditation*) and
- In order for a school to maintain its eligibility for accreditation, it must maintain all necessary authorizations from the state(s) in which it operates and maintain compliance with all applicable local, state, and federal requirements (*Section I (G)(2)(d), Rules of Process and Procedure, Standards of Accreditation*).

Simply put, CTOHE’s decision to deny Paier College’s application for renewal of its certificate of authorization places Paier College out of compliance with the ACCSC’s *Rules* listed above. The only remedy for this violation is for Paier to regain and retain its state authorization.

Moreover, ACCSC’s *Rules* for Institutional Eligibility requirements state that a school must maintain compliance with all applicable state requirements. In cases where accrediting standards and state government requirements differ, the more stringent will apply. If conflicts exist between state requirements and accrediting standards, the state requirements will take precedence (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*). CTOHE notified Paier College that the school failed “to meet the approval standards as set forth in the Regulations of Connecticut State Agencies sections 10a-34-11 through 10a-34-24” which include the following areas: administration, adequacy of resources, faculty, curriculum and instruction, library and learning resources, facilities and equipment, catalogs and program advertising, and student services (*Id.*, pgs. 1-3). That CTOHE determined that Paier College failed to meet these state approval standards places Paier College out of compliance with the ACCSC *Rule* stated above.

More substantively, while resources/financials, faculty, facilities, catalog, and student services are areas of concern known to the Commission as communicated in the section of this letter titled “August 2024 Meeting and Review,” the additional areas of governance, curriculum, library/learning resource system, and advertising are of interest to the Commission given that ACCSC has standards in these areas as well. While the Commission has not made its own determination of non-compliance for these areas with regard to the Commission’s standards, the Commission is interested in obtaining evidence of the school’s compliance with ACCSC standards. Specifically, Paier College must be able to document its compliance with the following:

- Paier College must show that it meets Connecticut’s more stringent requirement that a board member representing a public interest may not derive financial gain from the operation of the institution;
- Paier College must show that the school has an established process for the design and development of appropriate education and training programs and ensures that appropriate elements are included in the program curriculum (*Section II (A)(2), Substantive Standards, Standards of Accreditation*);
 - CTOHE found that the school “[f]ailed to provide a carefully planned and published sequence of related courses and other instruction activities, including well-defined instructional outcomes, and systematic planning by faculty” (*Id.*, pg. 2);
- Paier College must show that the school’s student body is adequately served and has ready access to sufficient and appropriate learning resource materials in compliance with *Section II (A)(6), Substantive Standards, Standards of Accreditation*;
 - CTOHE found that Paier College’s library contained outdated books in poor condition.
- Paier College must show that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*).
 - CTOHE found that the marketing flyer provided in the application did not show the same learning outcomes as found in the school’s catalog.

Accordingly, Paier College must provide the following information:

- a. Documentation of the school’s compliance with the **accrediting standards** referenced on page 20 of this letter;
- b. All items set forth in the “**Teach-Out Plan Requirements**” on page 22 of this letter;

- c. A detailed explanation of the current status of the school’s change of control transaction;
- d. A detailed explanation with evidence that the school meets the state of Connecticut’s requirement for governance as set forth in the CTOHE September 30, 2024 Renewal of Authorization Denial letter;
- e. Evidence that the school has an established process for the design and development of appropriate education and training programs and ensures that appropriate elements are included in the program curriculum;
- f. Evidence that the school’s the school’s marketing flyer show the same learning outcomes as found in the school’s catalog and that these advertised and disclosed outcomes align with those as reported to ACCSC; and
- g. Any additional information that may help the Commission to determine the school’s compliance with accrediting standards.

NOTIFICATION REQUIREMENTS:

The Commission reminds Paier College of its duty to notify ACCSC of any material event or circumstance that will or could affect the school’s operations, policies, staff, curricula, reputation, approval status or authority to operate as a legal entity, or financial status. Such notification must be in writing, made within 10 calendar days of the event’s occurrence, and is in addition to disclosures that are required in the applications for initial or renewal of accreditation or any substantive change report (*Section I (E)(1), Rules of Process and Procedure, Standards of Accreditation*). Specifically, Paier College must notify ACCSC of investigations or open actions by state or federal authorities related to a school’s licensure (e.g., non-renewal of the school’s Certificate of Authorization issued by the state of Connecticut), approval to operate, program approval(s), or participation in federal programs (e.g., open complaints, issuance of a Civil Investigative Demand or subpoena by a state or federal agency) or Any criminal or civil action filed by a state (including state-supported legal assistance agencies) or federal authorities against the school, its officers, or employees (*Section I (E)(2)(g&h), Rules of Process and Procedure, Standards of Accreditation*).

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **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.

TEACH-OUT PLAN REQUIREMENTS:

Given the serious nature of the issues outlined herein, the Commission directs the school to provide:

- a. An [ACCSC Institutional Teach-Out Plan Approval Form](#);
- b. The Institutional Closure Plan submitted to the state of Connecticut;
- c. Confirmation of whether Paier College intends to or has appealed CTOHE’s decision to not renew the school’s Certificate of Authorization to include any documentation of the school’s appeal, if applicable; and
- d. Any additional correspondence received from the state of Connecticut.

This information is due for upload to the ACCSC School Submission Portal **no later than October 15, 2024.**

MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

According to *Section VII (M),(5) 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 that the identified areas of non-compliance are basic requirements of accreditation and involve the potentially imminent loss of Paier College’s eligibility for accreditation through the loss of state authorization, the Commission at its November 2024 meeting can take an immediate adverse action to withdraw the school’s accreditation.

The maximum timeframe allowed for Paier College 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, 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. Given that the state of Connecticut has chosen to not renew the school’s Certificate of Authorization to operate a school in the state, the maximum timeframe to achieve compliance in that area will not extend beyond the date when the state’s decision becomes final.

NOTIFICATION TO STUDENTS:

Within **seven days** of receipt of the Probation notification and for the duration of that action, the school must:

- a. Inform current and prospective students in writing that the school has been placed on Probation 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.

The school must **within seven days** inform current and prospective students in writing that the school has been placed/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.

Paier 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. 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](#).

When preparing the response, please keep in mind the following:

- The school's response should be as clear and comprehensive as possible in order to demonstrate compliance with accrediting standards;
- The school's responses must include a restatement of the Findings or Additional Information Required, followed by a narrative response, and include, where necessary, complete and appropriate documentation to demonstrate compliance with accrediting standards;
- The school's response should also include information relative to any changes, improvements, or developments that might influence the Commission's evaluation of the school's compliance with accrediting standards;
- 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; and
- Please indicate the date of an effective change and provide supportive documentation that substantiates the change.

Paier 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 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 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 responses to this letter must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before October 15 and 25, 2024**. If the responses, the required fee, and the certifications attesting to the accuracy of the information is not received

in the Commission’s office **on or before October 15 and 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] at [REDACTED] or [REDACTED] at [REDACTED].

Sincerely,

[REDACTED]

Executive Director

c: [REDACTED]