

March 14, 2025

ELECTRONIC DELIVERY

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

School #M000242
Withdrawal of Accreditation

Dear ██████████

At the February 2025 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to place Paier College located in Bridgepoint, Connecticut on Probation in relation to the following:

- Paier College’s November 7, 2024 Current Accreditation Status notice;
- The Commission’s November 21, 2024 Probation;
- The Commission’s December 16, 2024 letter regarding student notification of the probation status;
- Paier College’s December 1, 2024 Hearing Update;
- Paier College’s Response to the Commission’s December 16, 2024 letter, submitted to ACCSC on December 19, 2024;
- Paier College’s Response to the Commission’s November 21, 2024 Probation along with the Request to Show Good Cause, submitted to ACCSC on January 14, 2025¹; and
- The record of reviews leading up to the Probation action with regard to the school’s:
 - Application for Renewal of Accreditation;
 - Application for Unrelated Non-Degree Program in Web Development Design (Certificate)
 - Applications for Degree Programs in
 - Industrial Design (BS) and
 - Mass Communication (BA);
 - Applications for Master’s Degree Programs in
 - Design Management (MPS) and
 - Global Media and Communication Studies (MS);
 - Complaint Review;
 - Change of Location Visit;
 - The April 7, 2023 Commission letter with regard to the shared ownership with Stone Academy; and
 - The April 12, 2023 Commission letter with regard to the April 4, 2023 Past Performance Violation notice from the U.S. Department of Education.

¹ Although this response is dated January 3, 2025, the response was not received by ACCSC until January 14, 2025.

Upon review of the history of these matters, the November 21, 2024 Probation, the December 16, 2024 letter, and the school's December 19, 2024 and January 14, 2025 responses, the Commission found that:

- Paier College failed to maintain 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*);
- Paier College failed to meet its burden to demonstrate continuous compliance with accrediting standards and has failed to maintain its eligibility for accreditation through the failure to fulfill all process, response, directive and reporting requirements in the manner and within the time frame prescribed (*Section I (G)(2)(a&c) & (J)(1), Rules of Process and Procedure, Standards of Accreditation*).
- Paier College 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*).

Based on the foregoing grounds, the Commission voted to deny the Request to Show Good Cause, withdraw the accreditation of Paier College, and remove the school from the ACCSC list of accredited institutions. The history of the Commission's review and grounds for the Commission's decision to withdraw Paier College's accreditation are set forth below.²

History of the Commission's Review: Request to Show Good Cause & Application for a Change of Control-Part I³

August 2024 Meeting

At the August 2024 meeting, the Commission reviewed the previously granted decision⁴ to allow Paier College to change control while on Warning and the school's Application for a Change of Control-Part I. The school's request to change ownership and the Application for a Change of Control-Part I indicate that [REDACTED] would have no continued ownership, management, or administrative role at the school. Given the Commission's serious concerns with regard to [REDACTED] fitness as a continued owner, manager, or administrator of the school, the Commission approved the change of control application with the added requirement of a total reevaluation.⁵

August 2024 Meeting & September 2024 Meeting

As part of the October 4, 2024 Probation resulting from the August 2024 meeting and September 2024 meeting, the Commission emphasized that its approval of the change of control application was based heavily upon the Commission's understanding that [REDACTED] would have no ownership, management, or administrative role at the school. The Commission further communicated that because Paier College had yet to effectuate the proposed change of control and the associated transaction, the Commission's concern

² The Commission noted that although three items are included as the grounds for withdrawal, the school did not fully resolve the Commission's compliance concerns in the areas of management and administrative capacity, state authorization, student achievement, verifiable records of initial employment, cancellation policy, admissions, graduation requirements, student satisfaction, faculty, program advisory committees, catalog, physical facility, and obligations to students.

³ The associated materials and Commission actions cited herein are incorporated into the record of this matter by reference.

⁴ Previously approved at the Commission's March 2024 meeting and detailed in an April 10, 2024 letter to Paier College.

⁵ See the Commission's August 13, 2024 Application for a Change of Control-Part I Acceptance letter.

was heightened. The October 4, 2024 Probation directed Paier College to provide a detailed explanation of the current status of the school's change of control transaction.

November 2024 Meeting

At the November 2024 meeting, the Commission reviewed Paier College's response to the October 4, 2024 Probation to include information regarding the school's change of control transaction. The November 21, 2024 Probation notes that ACCSC's standards require school owners to have past records that demonstrate a commitment to providing quality education to students, ethical fair, and honest practice, and compliance with accrediting standards and applicable federal and state requirements. In the Commission's estimation, [REDACTED] fails to meet this test. As such, the Commission found that as long as [REDACTED] maintains control, ownership, or employment in a management or administrative capacity, Paier College will be out of compliance with *Section I (A)(2)(a-c), Substantive Standards, Standards of Accreditation*. Further, the Commission found that Paier College has not effectuated the proposed change of control and associated transaction or apprised the Commission of any new proposed transactions that would remove [REDACTED] from ownership, administration, or management at Paier College. Moreover, the Commission determined that as of November 21, 2024 the proposed transaction approved in August 2024 as a part of the school's Application for a Change of Control-Part I has not been consummated. Accordingly, that application and the Commission's corresponding approval is now expired. The Commission directed that any proposed change of control will require the submission of a new Request to Show Good Cause to change control while operating under a Probation accompanied by a new Application for a Change of Control-Part I.

February 2025 Review & Action

At the February 2025 meeting, the Commission reviewed the new Request to Show Good Cause ("request") along with the new Application for a Change of Control-Part I. The Commission found the request and application to be incomplete.

As an initial matter, the Request to Show Good Cause is not signed and as such is invalid and lacks the attestation that the information therein and attached thereto is correct. Additionally, in response to the attestation that the school is in good standing with all accrediting and regulatory agencies (including ACCSC) and not subject to any sanction, heightened monitoring, or limitation of any kind the school responded only by saying it is currently "under settlement" with the Connecticut Office of Higher Education, which is incomplete at best insofar as the Commission has been made aware that the state of Connecticut has denied Paier College's application for renewal of its certificate of authorization (see history section below), which is a significant sanction against the school. In addition, the request generally lacks any supporting documentation, but particularly with respect to the financial soundness, sufficient management and administrative capacity, and sufficient facilities and educational resources.

The Application for a Change of Control-Part I fails to include the following exhibits as referenced by the application:

- The most recent fiscal year-end audited financial statement for the school undergoing the change of control prepared in accordance with the ACCSC Instructions for the Preparation & Submission of Financial Statements and Related Information;
- Audited financial statements for the proposed new owner, prepared in accordance with the ACCSC Instructions for the Preparation & Submission of Financial Statements and Related Information; and
- Internally prepared financial statements for the proposed new owner.

The Application for a Change of Control-Part I fails to include the following exhibits despite being referenced as included by Paier College:

- Control Structure Diagrams (Current & Proposed);
- Resumes/CVs of Paier College Leadership & New Owners (Detailed);
- Pro Forma Balance Sheet (Post-Transaction);
- [REDACTED] Internally Prepared Statements (October 2024); and
- [REDACTED] ACCSC Accreditation Workshop Certificate.

As a secondary and substantive matter, Paier College's Request to Show Good Cause references *Section VII (M), Rules of Process and Procedure, Standards of Accreditation* which refers to the Time Frame to Remedy Noncompliance and states that this request is "specifically regarding **maintaining compliance with accrediting requirements and timelines** related to our **Change of Ownership and Resumption of Operations** after a period of temporary interruption in instruction" (January 14, 2025 Paier College Response, pg. 14). However, the Request to Show Good Cause does not directly address the requirement of *Section IV (E)(2)(s)(iv), Rules of Process and Procedure, Standards of Accreditation* for a school on Probation wishing to undergo a change of control:

A school that is subject to a...Probation may only seek the Commission's approval for the transfer of accreditation that would result from a change of control by showing good cause exists to allow for the change. In order to have the change of control application considered, the school and the proposed new owner must demonstrate that the proposed change of control would substantially resolve the issues cited in the Warning or Probation.

Regardless, the Commission reviewed Paier College's explanation as to why the school believes good cause exists such that the Commission should grant the school's request to change control. In the request, Paier College cites several factors as evidence of good cause, including substantial corrective actions taken, continuity for existing students, and documented improvements in financial and administrative operations. The Commission, however, found no evidence to support these assertions.

While Paier College asserted that the school has addressed prior leadership concerns, invested in infrastructure, and developed a comprehensive future plan, the response lacks the necessary detail and supporting documentation to substantiate these claims. Specifically, although the request and application provide background information for [REDACTED], the application states that "the new ownership intends to **retain the current operational leadership**," and references "[r]esumes and CVs of all institutional leaders—President, Registrar, Directors of Financial Aid, Admissions, and Student Services" (*Id.*, pg. 33), these documents were not in fact included in the response.

Moreover, while the request and application highlight significant investments in faculty, facilities, and academic infrastructure, the College has not provided supporting documentation to verify these investments or completed improvements. Additionally, although the request references a comprehensive future plan, the application presents only broad concepts rather than specific, detailed actions supported by ongoing institutional assessments. These assessments are essential to ensure effective management and administration of the institution, as well as the quality of education provided, with both internal and external validation.

Regarding the good cause related to continuity for existing students, Paier College's request mentions the approximately 40 art students who need to complete a degree. However, the submission lacks supporting

information or documentation to demonstrate that adequate instruction would be provided to these students. For example, while the request and application mention plans to retain or recruit an academic dean and faculty/program chairs, the response does not provide sufficient evidence that these individuals have been in fact secured as employees or possess the qualifications necessary to meet ACCSC's accrediting standards.

With respect to the good cause of documented financial and administrative improvements, Paier College referenced having secured the necessary resources through the strong financial position of the new ownership team having invested into the school's "legal/regulatory fees, faculty contracts, technology upgrades (e.g., learning management systems, library resources like LIRN, etc.), and student services" and as being backed by \$16.5 million revenue from [REDACTED] healthcare system operations (*Id.*, pg.18). However, the request and application do not include audited financials for the proposed owner, internally prepared financial statements for the proposed new owner, or the pro-forma balance sheet required to demonstrate that Paier College has obtained the resources. All of these are essential items required to process a change of control application and Paier College produced none of them.

As such, the Commission found that Paier College failed to demonstrate with documentation that the school has taken substantial corrective action, has a clear plan for the continuity for existing students, financial soundness, and administrative improvement. Paier College's Request to Show Good Cause fails to include any documentation to support the narrative assertions included therein. Overall, the Commission found that the Request to Show Good Cause fails to show that good cause in fact exists to allow for the change of control application because the school and the proposed new owner failed to demonstrate that the proposed change of control would substantially resolve the issues cited in the Probation.

Based on the foregoing, the Commission voted to deny Paier College's Request to Show Good Cause. In addition, because Paier College failed to demonstrate good cause exists to allow a change of control, the Commission did not continue to process the otherwise incomplete Application for a Change of Control-Part I.

History of the Commission's Review: Grant of Accreditation⁶

May 2023 Review

At the May 2023 meeting, the Commission directed Paier College to demonstrate that all owners,⁷ 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.

⁶ This includes the Application for Renewal of Accreditation; Application for an Unrelated Non-Degree Program; Applications for Degree Programs; Applications for Master's Degree Programs; Complaint Review; and Application for a Change of Location-Part I/II.

⁷ *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 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 that the owner of Paier College, [REDACTED], also had an ownership interest in Stone Academy, the Commission voted to place Paier College on Warning and requested additional information regarding the school's compliance with accrediting standards and fitness of the school's owner to operate an ACCSC accredited school.⁸

September 2023 Review

At the September 2023 meeting, the Commission reviewed the August 7, 2023 Warning and the school's response. Paier College disagreed with the Commission's assessment that "Stone Academy campuses made a decision to close precipitously" (August 7, 2023 Warning, 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 contended that Stone Academy and [REDACTED] 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 [REDACTED] 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 Commission recognized Paier College's contention that Stone Academy did not make the decision to close precipitously but was required to do so by the state of Connecticut; however, the school provided no documentation to support the claim that Stone Academy was forced to close. This point of contention notwithstanding, that the state of Connecticut would take such drastic action to cause the immediate shut-down of a school speaks to the level of concern by the 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).

Paier College did reference that the school has undertaken court proceedings to dispute the actions and allegations of the state of Connecticut. Although these proceedings are ongoing, the Commission determined that the circumstances require the Commission's heightened scrutiny of Paier College and the fitness of its ownership. 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 in a December 13, 2023 Warning requested additional information regarding the school's compliance with accrediting standards.⁹

⁸The full details of the Commission's May 2023 review are contained within the Commission's August 7, 2023 Warning.

⁹ The full details of the Commission's September 2023 review are contained within the Commission's December 13, 2023 letter.

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 attendance taking 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*). 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 disputed the complaint's allegations and in turn alleged that the state is incorrectly citing regulations in several areas including marketing, funding, qualified staffing, and attendance. Similarly, [REDACTED] disputed the claims against him again stating that he had no day-to-day control over Stone Academy after October 1, 2021.

February 2024 Meeting

At the February 2024 meeting, the Commission reviewed its December 13, 2023 Warning and the school's response. The Commission acknowledged Paier College's proposed teach out sent to the state of Connecticut (which does not identify the proposed school) and noted that the cases against Stone Academy, Paier College, and [REDACTED] are ongoing. Nonetheless, the Commission required Paier College to 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 (*Section I (A)(2)(a-b), Substantive Standards, Standards of Accreditation*).

The Commission also reviewed Paier College's financial structure for compliance with *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 voluntary withdrawal from Title IV in December 2023. However, the Commission also expressed concern with the school's ability to sustain educational quality in the face of mounting challenges.

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.¹⁰

Subsequent to February 2024 Meeting

Subsequent to the Commission’s February 2024 meeting, ACCSC became aware of a March 4, 2024 Press Release¹¹ from the CT AG.¹² This press release states that “the State has secured a \$5 million prejudgment remedy against Stone Academy” and contains the Order Regarding: 07/13/2023 101.00 Notice of Application for Prejudgment Remedy / Hearing JD-CV-53¹³ (“the Order”) (March 4, 2024 CT AG Press Release).

The Order raised serious questions as to [REDACTED] past record of compliance with state laws and regulations regarding the Connecticut Unfair Trade Practices Act (“CUTPA”) and Stone Academy’s obligation to provide an acceptable teach-out plan for students 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 to students in an ongoing and sustainable manner as required under *Section I (C)(1), Substantive Standards, Standards of Accreditation*.¹⁴

August 2024 Meeting

At the August 2024 meeting, the Commission considered the Commission’s June 4, 2024 Warning, ACCSC’s June 13, 2024 Media Report letter, and the school’s responses. The Commission found the following areas in which Paier College did not document compliance:

- 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*).
- Paier College must demonstrate that the school supports student achievement rates through the school’s verifiable records and documentation of initial employment of its graduates and that the employment classifications are appropriate and reasonable based on the educational objectives of the program (*Section VII (B)(3) & Appendix VII, Substantive Standards, Standards of Accreditation*).

¹⁰ The full details of the Commission’s February 2024 review are contained within the Commission’s June 4, 2024 letter.

¹¹ <https://portal.ct.gov/ag/press-releases/2024-press-releases/attorney-general-tong-secures-prejudgment-remedy-in-case-against-stone-academy>

¹² 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*).

¹³ https://portal.ct.gov/-/media/ag/press_releases/2024/prj-ruling-states-case.pdf

¹⁴ The full details of ACCSC’s interest are contained within the June 4, 2024 letter.

- 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)(2)(b), Substantive Standards, Standards of Accreditation*).
- Paier College must demonstrate that it executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*).
- 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*).
- Paier College must demonstrate that prior to starting class it furnishes students with a final copy of the enrollment agreement signed by both parties (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*).
- 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*).
- Paier College must demonstrate that the school consistently ensures all graduation requirements are met prior to graduating as published in the school's catalog (*Section IV (C)(1)(a), Substantive Standards, Standards of Accreditation*).
- 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*).
- 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*).
- 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*).
- 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*).
- 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*).
- 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*).

- 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*).
- 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*).
- 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*).

In conjunction with the September 2024 review, the Commission voted to place Paier College on Probation.¹⁵

September 2024 Meeting

Subsequent to the August 2024 meeting and review, the Commission received notice of CTOHE’s September 5, 2024 Site Visit Report, Paier College’s September 23, 2024 Response to CTOHE Site Visit Report, and CTOHE’s September 30, 2024 Renewal of Authorization Denial letter. CTOHE’s Renewal of Authorization Denial states that CTOHE “has denied Paier College’s application for renewal of its certificate of authorization” (September 30, 2024 CTOHE Renewal of Authorization Denial Letter, pg. 1).

Accordingly, the Commission found Paier College out of compliance with the following ACCSC *Rules for Institutional Eligibility and Obligations of an Institution to Maintain Eligibility for Accreditation*:

- 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 must 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*).

Additionally, CTOHE’s determination that Paier College 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) led the Commission to determine that Paier College was out of compliance with ACCSC’s requirement that a school must maintain compliance with all applicable state requirements.

At the time of this review, the Commission did not yet find Paier College to be out of compliance with several other areas corresponding to ACCSC standards and requested documentation of Paier College’s

¹⁵ The full details of the Commission’s August and September 2024 reviews are contained within the Commission’s October 4, 2024 Probation.

compliance with the corresponding ACCSC standards as the Commission continued its assessment of the school. Based on the foregoing, the Commission placed Paier College on Probation.¹⁶

The Commission established that given that the identified areas of non-compliance were basic requirements of accreditation and involved the potential imminent loss of Paier College's eligibility for accreditation through the loss of state authorization. The Commission established that at its November 2024 meeting, it can take an immediate adverse action to withdraw the school's accreditation. Paier College was 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.

November 2024 Meeting

At the November 2024 meeting, the Commission reviewed the following:

- The Commission's October 4, 2024 Probation Letter;
- Paier College's Teach Out Plan Information for the Connecticut Office of Higher Education ("CTOHE") submitted to ACCSC on October 15, 2024;
- Paier College's Clarification of the School's intent to appeal CTOHE's decision submitted to ACCSC on October 15, 2024; and
- Paier College's Response to the Commission's October 4, 2024 Probation Letter, submitted to ACCSC on October 31, 2024;¹⁷ and
- The record of reviews leading up to the Probation action.

Upon review of the above, the Commission voted to continue Paier College on Probation and to direct Paier College to Cease Enrollment. Specifically, the Commission determined areas of non-compliance with accrediting standards and additional areas of on-going concern regarding compliance with accrediting standards as follows:

I. Areas of Non-Compliance with Accrediting Standards

1. Paier College failed to demonstrate that all owners, members of school management, and administrative employees have past records that demonstrate 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), Substantive Standards, Standards of Accreditation*).
2. Paier College failed to demonstrate compliance with ACCSC's *Rules for Institutional Eligibility and Obligations of an Institution to Maintain Eligibility for Accreditation*:
 - 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

¹⁶ The full details of the Commission's August and September 2024 review are contained within the Commission's October 4, 2024 Probation.

¹⁷ The Commission's October 4, 2024 letter requests responses by October 15, 2024 and October 25, 2024. Subsequent to the October 25, 2024 deadline and without the school's response to all requested items, ACCSC staff requested the school's response on October 28, 2024, October 29, 2024, October 30, 2024 emails. ACCSC informed Paier College of the school's delinquency on October 29, 2024. Paier College submitted a response on October 31, 2024.

- 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*).

II. Additional Areas of On-Going Concern Regarding Compliance with ACCSC Accrediting Standards

1. 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*).¹⁸
2. 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*).
3. Paier College must demonstrate that the school supports student achievement rates through the school's verifiable records and documentation of initial employment of its graduates 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*).
4. 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*).
5. Paier College must demonstrate compliance with accrediting standards relative to admissions practices as follows¹⁹:
 - Paier College must demonstrate that it executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*).
 - 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*).
 - 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*).
 - 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*).

¹⁸ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

¹⁹ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis is preserved.

6. Paier College must demonstrate 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*).²⁰
7. 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*).²¹
8. Paier College must demonstrate compliance with accrediting standards relative to faculty as follows:²²
 - 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 as the course the faculty member is teaching. (*Section III (B)(7), Substantive Standards, Standards of Accreditation*).
 - 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*).
 - 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*).
9. 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*).²³
10. 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*).²⁴
11. 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*).²⁵
12. 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

²⁰ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

²¹ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

²² Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

²³ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

²⁴ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

²⁵ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

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*).²⁶

Additionally, the Commission noted that in order for a school to maintain its eligibility for accreditation, it must fulfill all process, response, directive, reporting, and substantive change requirements (*Section I (G)(2)(c), Rules of Process and Procedure, Standards of Accreditation*). The Commission found that Paier College's responses provide minimal information to only a few of the requirements and completely omit responses to other requirements. The Commission noted that without complete responses, the Commission cannot determine the school's compliance with accrediting standards and stated that any future failure to respond to a Commission request will result in findings of non-compliance.

Moreover, given the above detailed areas of non-compliance and areas of continued concern, the Commission voted to direct Paier College to Cease Enrollment, irrespective of CTOHE's action to limit the school's operations. The detailed areas of concern including faculty, physical facilities, financial stability, and ownership raise significant questions as to the school's ability to enroll and educate students. Paier College's failure to respond to many of the Commission's requests for information did not allow the Commission to disabuse itself of these concerns. Accordingly, the Commission stated that Paier College may not enroll any new students until such time as this directive is lifted.

Regarding the school's maximum timeframe to achieve compliance, the Commission, in its November 21, 2024 Probation elected to establish separate timeframes for the identified areas of noncompliance. Specifically, with regard to ACCSC's *Rules* for Institutional Eligibility and Obligations of an Institution to Maintain Eligibility for Accreditation with the loss of state authorization, the Commission at its February 2025 meeting can take immediate adverse action to withdraw the school's accreditation and the maximum timeframe to achieve compliance in that area will not extend beyond the date when the state's decision becomes final. Additionally, with regard to the past record of members of school management and administrative employees (*Section I (A)(2)(a-c), Substantive Standards, Standards of Accreditation*), the maximum timeframes allowed for Paier College to achieve and demonstrate compliance with the *Standards of Accreditation* will not exceed the timeframe established in *Section VII (M),(5) Rules of Process and Procedures, Standards of Accreditation*. Paier College was 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.

February 2025 Review & Action

At the February 2025 meeting, the Commission considered Paier College's responses to the Commission's November 21, 2024 Probation and found that the school failed to meet its burden to demonstrate continuous compliance with the *Standards of Accreditation* in the following areas:

1. Paier College failed to demonstrate that 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*

²⁶ Paier College did not respond to the Commission's October 4, 2024 request for information. Accordingly, the Commission's previous analysis has been preserved.

and Procedure, Standards of Accreditation);²⁷ Specifically, Paier College has failed to provide education and training to students without cessation in accordance with the school’s primary educational objectives.

The period of non-operation effectively began after the school did not return to offering education to students subsequent to an extension of its regularly scheduled break over the summer of 2024. In response to the June 13, 2024 Commission letter, Paier College indicated that the school would resume operation providing education and training to students on September 3, 2024. It failed to do so. The Commission found that the school’s period of non-operation from September 2024 to the present shows a failure to demonstrate continuous operation or an ability to operate continuously going forward.

According to the school, the initial period of non-operation was due to a Connecticut Office for Higher Education (“CT OHE”) action which advised the school not to schedule classes until its license to operate was reauthorized. That reauthorization did not come and instead the state of Connecticut took an action to deny the school’s application for renewal of its certificate of authorization.

In response to the November 21, 2024 Probation, Paier College provided varying student populations including 54 in the Request to Show Good Cause; “about 40” in the Request to Show Good Cause narrative; and 37 “Individual Student Degree Completion Progress Forms” as part of the “State of CT OHE Response to Findings.” The Commission determined that, regardless of the current population, the response to the November 21, 2024 Probation fails to demonstrate that the school is actively operating and providing education and training. Additionally, the response does not include any supporting documentation or information to confirm that the school has the requisite management, resources, and facilities to operate continuously or to resume operations.

Regarding the current operations, the “State of CT OHE Response to Findings,” submitted as part of the response to the November 21, 2024 Probation includes an “Individual Student Degree Completion Progress Form” listing the courses completed and those still required as of December 31, 2024 for each of the 37 students. However, the response lacks important and supporting documentation regarding the remaining required courses for each of these students to complete their programs of study.

Furthermore, although the “State of CT OHE Response to Findings” provides a “Course Offerings by Term,” outlining courses to be offered in “Spring Term A” and “Spring Term B,” the response does not specify estimated start dates for these terms, the duration of each term, or details of the school’s overall schedule to demonstrate continuous operations. Additionally, the response does not offer any indication that these 37 students plan to complete their training at Paier College. There are no estimated graduation dates or documentation to show that the school has informed students of the anticipated timeline or remaining coursework required for graduation nor is there any documentation from students indicating their intent to return to the school at this point.

With regard to demonstrating that the school has the necessary facilities for maintaining continuous operation, the school’s response refers to facility repairs and receipts as follows:

²⁷ The term “continuous operation” means a school operating without cessation – with the exception of regularly scheduled breaks, vacation periods, or an approved change of location – providing education and training to students in accordance with its primary educational objective(s), and with continuous licensure by the state granting approval to do so (*Section I (A)(11) Rules of Process and Procedure, Standards of Accreditation*).

- In the Request to Show Good Cause, Paier College indicated “classroom equipment and technology upgrades in process (with receipts attached if needed)” (Paier College January 14, 2025 Response, pg. 18);
- As part of the “State of CT OHE Response to Findings” – Paier College stated that “[REDACTED] has attached receipts and repair orders for these upgrades, substantiating the ongoing work and the institution’s financial commitment” (*Id.*, pg. 52); and
- Paier College provided a Narrative on Survey Results (Exhibit XI – Receipts Facility Repairs) (*Id.*, pg. 4).

Paier College, however, did not provide any receipts or repair orders to demonstrate that the school has maintained the facilities necessary to operate continuously or to resume operations. Further, the Request to Show Good Cause and “State of CT OHE Response to Findings” indicate that the ongoing cooling repairs have an expected completion of May 15, 2025 and that the “pump and motor replacements” that “feed the heating loops on all floors are scheduled for replacement starting January 9, 2025 (January 14, 2025 Paier College Response, pg. 51).” While this timeline may align with the school’s “broader plan to reopen classes and safely accommodate returning students, faculty and staff” (*Id.*), given the school’s residential method of delivery, the continued repairs and lack of documentation failed to demonstrate the ability for current continuous training and education.

Overall, the Commission found that Paier College has failed to demonstrate that the school has maintained 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*). Moreover, insofar as the state of Connecticut may or may not have taken an action that caused or led to the cessation of training, the Commission determined that such state action is not a mitigating factor to excuse non-continuous operation and the school’s concordant non-compliance with *Section I (G)(2)(b), Rules of Process and Procedure, Standards of Accreditation*.

2. Paier College failed to meet its burden to demonstrate continuous compliance with accrediting standards and has failed to maintain its eligibility for accreditation through the failure to fulfill all process, response, directive and reporting requirements in the manner and within the time frame prescribed (*Section I (G)(2)(a&c) & (J)(1), Rules of Process and Procedure, Standards of Accreditation*). Participation in the process of accreditation is voluntary on the part of the school. However, schools seeking to maintain accreditation agree to support the accreditation process and to meet or exceed the *Standards of Accreditation* throughout the application and accreditation period. Overall, the burden rests with the school to show that it is meeting its mission, serving students, and meeting all requirements of the *Standards of Accreditation* in order to maintain ACCSC accreditation.

The Commission’s November 21, 2024 Probation highlights areas where Paier College has not provided a response and cautioned the school that continued failure to address the Commission’s questions, concerns, and requests will result in a finding of non-compliance. The Commission has identified the following areas in which Paier College’s response was insufficient or incomplete:

- The school failed to submit any Graduation and Employment Charts or backup documentation;
- The school failed to submit documentation of faculty qualifications or evidence that faculty prior work experience is verified;

- The school failed to hold any Program Advisory Committee meetings in 2024 required as an element of on-going program evaluation;
- The school failed to provide an audit of transcripts for graduates since the on-site evaluation and did not evaluate the number of transcripts previously incorrectly entered into the school's system; and
- The school failed to include a copy of the current catalog.

Additionally, the Commission found that Paier College did not submit the school's audited comparative financial statements for fiscal year ending June 30, 2024 by December 31, 2024 as required or as part of the response to the November 21, 2024 Probation. Given the nature of the school's situation and failure to maintain continuous operation, a review of the fiscal year financial statements is essential. As such, Paier College did not demonstrate continuous compliance with accrediting standards and has failed to maintain eligibility for accreditation. Because the burden rests with the school to establish that it is meeting accrediting standards, a school must supply the Commission with complete information and documentation showing the school's compliance with all accrediting standards if the school is to maintain accreditation. Despite being given multiple opportunities, the Commission determined that Paier College has not met this burden.

The Commission determined that it simply cannot continue in a review process where the school fails to submit materials and to comply with accrediting standards and requirements within prescribed timeframes. The Commission determined it is untenable to continue the school's accreditation based on Paier College's ongoing and persistent failure to meet its burden in the accreditation process.

3. Paier College 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*). As previously stated, the school failed to submit audited comparative financial statements for fiscal years ending June 30, 2024 in accordance with requirements set forth in ACCSC's Instructions for the Preparation and Submission of Financial Statements and Related Information by December 31, 2024 as required or as part of the response to the November 21, 2024 Probation (*Section V(C)(1&3), Rules of Process and Procedure, Standards of Accreditation*).

The November 21, 2024 Probation acknowledges Paier College's plans for continued and sustainable revenue in the face of HCM2 and the school's withdrawal from Title IV. Paier College submitted the school's fiscal year end ("FYE") June 30, 2023 and 2022 audited financial statements in its July 2, 2024 Response (over six months late) and unaudited interim financial statements as of June 2024 in its July 18, 2024 response.

The submitted FYE June 30, 2023 and 2022 audited financial statements show a net loss of [REDACTED] in 2023 and [REDACTED] in 2022. Additionally, the financial statements indicate 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.

The school's interim unaudited financial statements as of June 2024 show 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.

As the school has failed to submit audited comparative financial statements for the fiscal year ending June 30, 2024 in accordance with requirements set forth in ACCSC's Instructions for the Preparation and Submission of Financial Statements and Related Information, the Commission found that Paier College has failed to meet its reporting requirements of *Section V (C)(1&3), Rules of Process and Procedure, Standards of Accreditation* and failed to show that the school is financially sound with resources sufficient for the proper operation of the school and discharge of obligations to students as required by *Section I (C)(1), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission voted to withdraw the accreditation of Paier College and to remove the school from the ACCSC list of accredited institutions.

Notification To Students

Within **seven days** of receipt of this letter, the school must:

- a. Inform all currently enrolled and prospective students of the withdrawal decision and indicate where the action can be obtained from the Commission's website;
- b. If the school chooses to appeal a withdrawal of accreditation decision, then the school must inform current and prospective students of the appeal and that the school is on Probation during the appeal process; and
- c. Once a decision to withdraw accreditation is final, the school must within seven days inform current and prospective students that the withdrawal of accreditation action is final. A school must delete all references to and claims of ACCSC accreditation from the school's website, catalog, enrollment agreement, advertising, and promotional materials immediately after withdrawal of accreditation.

Teach-Out Plan and Teach-Out Agreement

The Commission directs the school to provide an [Institutional Teach-Out Agreement Approval Form and Teach-Out Agreement Approval Form](#), which must be submitted as part of the response for the items listed above (*Section IV (F)(2)(b) Rules of Process and Procedure, Standards of Accreditation*). The school must demonstrate how it will ensure the opportunity for students to complete their program of study either by the school or through an agreement with another accredited institution(s) approved to offer a program comparative to the school's. The teach-out plan/agreement must contemplate the loss of accreditation and concordant loss of state or federal funding. The school's [Institutional Teach-Out Agreement Approval Form and Teach-Out Agreement Approval Form](#) should be submitted **on or before March 24, 2025**.

Appeal and Reapplication Process and Procedure

Paier College may opt to appeal the Commission's decision to withdraw accreditation or may elect to reapply for accreditation. Details regarding the reapplication and appeal procedures are outlined in the *ACCSC Rules of Process and Procedures, Standards of Accreditation*.

- If Paier College elects to appeal this decision, the school must sign and return the enclosed Letter of Intent to Appeal a Commission Decision, along with the Appeal Expense Fee of \$8,000.00, **on or before 10 days from the date of this letter (March 24, 2025)**.

- If Paier College elects to appeal this decision, the school's Application for Appeal of a Commission Decision and Grounds for Appeal must be submitted **on or before 30 days from the date of this letter (April 14, 2025).**
- If Paier College elects not to appeal this decision, the Commission's decision will become effective **10 days (March 24, 2025).** The school may submit comments **on or before 10 days from the date of this letter (March 24, 2025)** in accordance with the enclosed Public Comment Disclosure Form. Comments submitted by the school will accompany any public disclosure of a final Commission action pursuant to *Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation*.
- In accordance with *Section VII (N)(3) Rules of Process and Procedure, Standards of Accreditation*, the school may reapply no sooner than nine months from the date on which the withdrawal of accreditation becomes effective.

For additional information regarding the Commission's decision, please contact me directly at

[REDACTED]

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

Encls: Letter of Intent to Appeal a Commission Decision
ACCSC Standing Appeals Commission Members
Public Comment Disclosure Form



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

LETTER OF INTENT TO APPEAL A COMMISSION DECISION

To Be Submitted No Later Than March 24, 2025

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

Dear Dr. McComis:

This letter serves to provide notice that Paier College located in Bridgeport, Connecticut intends to appeal the recent decision of the Commission to withdraw the school's accreditation and remove the school from the list of ACCSC-accredited institutions. Attached is a check in the amount of \$8,000 as required by accreditation procedures. I understand that this fee is non-refundable.

I understand that an ACCSC Sitting Appeals Panel will meet to consider the appeal of the school and that I will receive final confirmation of the hearing at a later date. I have reviewed *Section VIII, Rules of Process and Procedure* of the *Standards of Accreditation* pertaining to appeals and noted that I am entitled to a transcript of the proceedings and to have representatives, including legal counsel, present with advance notification to ACCSC.

I understand that it is the right of a school to appeal an adverse accreditation decision taken by the Commission on the grounds that the decision was arbitrary, capricious, or otherwise in disregard of the criteria or procedures of the Commission, or not supported by substantial evidence in the record on which the Commission took the action (*Section VIII (B), Rules of Process and Procedures, Standards of Accreditation*). I understand that because the appeal must be based on evidence in the record at the time that the Commission took the adverse action, no new evidence may be submitted during the appeal process, except as allowed for under *Section VIII (C)(2)(c), Rules of Process and Procedure, Standards of Accreditation*.

I understand that it is the right of a school intending to appeal a Commission decision to indicate whether there is good cause as to why any member of the Commission's Standing Appeal Panel should not hear the appeal. I have reviewed the list of Standing Appeal Panel members and have included with this notice any objections to any member of the Standing Appeal Panel with the reasons and cause why I believe that member should not hear the school's appeal. I understand the absence of a submission with this notice indicates my approval to allow any member of the Standing Appeal Panel to sit for the school's appeal.

I understand that the Application for Appeal of Commission Decision along with the school's Grounds for Appeal are due to ACCSC **on or before April 14, 2025**, and I agree to submit that material on or before that date. I understand that failure to submit these required documents by the due date could prevent consideration of the school's appeal.

Signature

Date

Name/Title



2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
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www.accsc.org

Standing Appeals Panel Members

[illegible]



Accrediting Commission of Career Schools and Colleges

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PUBLIC COMMENT DISCLOSURE FORM

To Be Submitted No Later Than March 24, 2025

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

RE: **Paier College
84 Iranistan Ave
Bridgeport, Connecticut 06604**

I understand and agree that the Commission, pursuant to *Section X (C)(4) & (D)(4), Rules of Process and Procedure, Standards of Accreditation*, will make public the reasons for the decision together with any comments submitted by the school. I further understand that the summary will be accompanied by the attached comments.

I understand and agree that the attached comments constitute School's public comments on the adverse accreditation action that are to be disseminated with the public notice of the Commission's adverse accreditation decision including, but not limited to, dissemination to appropriate federal, state and other accrediting agencies and posting to the ACCSC website (*Section X (C)(4) & (D)(4), Rules of Process and Procedure, Standards of Accreditation*).

I understand and agree that the school is not obligated to submit public comments and acknowledge that the attached comments are provided voluntarily.

I understand and agree that the school's public comments must be in summary format, professional in tone, and free of profanity and calumnious statements and limited to two type written pages. I acknowledge that any comments which do not meet these requirements will not be disseminated or posted along with the summary of the reasons for the adverse accreditation decision.

I understand and agree that the Commission will release the adverse accreditation decision to the public pursuant to *Section X (D)(3), Rules of Process and Procedure, Standards of Accreditation* and that the school's written comments will not be added to this disclosure if this form and the comments are not submitted in the required format **on or before March 24, 2025**.

I understand and agree that the Commission has no responsibility for how the school's comments may be used once put into the public domain.

Signature

Date

Name/Title