

December 5, 2018

ELECTRONIC DELIVERY

██████████
Director
Vatterott College
8580 Evans Avenue
Berkeley, Missouri 63134

School #M001095

Dear ██████████:

At the November 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Probation Order for Vatterott College located in Berkeley, Missouri. The Commission’s concerns regarding Vatterott College’s compliance with accrediting standards arose in conjunction with the school’s Application for Renewal of Accreditation in May 2016. Upon review of the entire record,¹ including Outcomes Reports and Management Retention Reports; the Application for Renewal of Accreditation; on-site evaluation; the Team Summary Report; and the school’s responses, the Commission determined that Vatterott College failed to demonstrate compliance in the areas of student achievement and continuity of management over the period of the last accreditation cycle. Accordingly, the Commission voted to revoke the accreditation of Vatterott College and to remove the school from the ACCSC list of accredited institutions. The history of the Commission’s review of the school and the reasons for this decision are set out below.

HISTORY OF THE COMMISSION’S REVIEW

August 2014

At the August 2014 meeting,² the Commission voted to grant Vatterott College renewal of accreditation for five (5) years going forward from November 2012. The Commission also voted to place Vatterott College on **Outcomes Reporting** for the 14-month **Combination Welding (Diploma)** program, 14-month **Computer Technology (Diploma)** program, along with the 12-month and 14-month **Cosmetology (Diploma)** programs. Further, the Commission questioned the placement of graduates of the **Medical Assistant (AOS)** program as “Pharmacy Production Clerks” with “Express Scripts.” Additionally, the Commission voted to place Vatterott College on Management Retention Reporting to monitor the continuity of management and administrative capacity.

June 2015

At the June 2015 meeting,³ the Commission reviewed the Outcomes Report, Management Report, and Supplemental 2014 ACCSC Annual Report graduation and employment information and voted to continue Vatterott College on Outcomes Reporting for the 16-month **Medical Assistant (AOS)** program and 14-month **Combination Welding (Diploma)** program. Additionally, the Commission voted to continue Vatterott College on Management Retention Reporting.

¹ See the Commission letters dated September 2, 2014; September 17, 2015; September 1, 2016; December 8, 2016 Warning Order; July 14, 2017 Continued Warning Order; January 24, 2018 Continued Warning Order; and July 11, 2018 Probation Order; and the school’s responses.

² See Commission letter dated September 2, 2014 for more detailed information regarding this action.

³ See Commission letter dated September 17, 2015 for more detailed information regarding this action.

March 2016

At the March 2016 meeting,⁴ the Commission reviewed the Management Retention Report, Outcomes Report, and supplemental 2015 ACCSC Annual Report graduation and employment information and voted to continue Vatterott College on Management Retention Reporting and Outcomes Reporting for the following programs:

- 14-month Combination Welding (Diploma) program;
- 17-month Business Management (AOS) program;
- 14-month Electrical Mechanics (Diploma) program;
- 14-month Heating, Air Conditioning, & Refrigeration Mechanics (Diploma) program;
- 16-month Medical Billing and Coding (AOS) program;
- 21-month Pharmacy Technician (AOS) program;
- 17-month Recording Engineering & Producing with Management (AOS) program;
- 10-month Recording Engineering & Producing (Diploma); and
- 21-month Web Design & Multimedia Application Development (AOS) program.

November 2016

At the November 2016 meeting,⁵ the Commission reviewed the Management Retention Report and the Outcomes Report and voted to place Vatterott-Berkeley on Warning due to continued turnover in management and student achievement outcomes that continue to be below benchmark for the following programs:

- 14-month Combination Welding (Diploma) program;
- 17-month Business Management (AOS) program,
- 14-month Electrical Mechanics (Diploma) program;
- 14-month Heating, Air Conditioning, & Refrigeration Mechanics (Diploma) program;
- 16-month Medical Billing and Coding (AOS) program;
- 21-month Pharmacy Technician (AOS) program;
- 17-month Recording Engineering & Producing with Management (AOS) program;
- 10-month Recording Engineering & Producing (Diploma); and
- 21-month Web Design & Multimedia Application Development (AOS) program.

May 2017

At the May 2017 meeting,⁶ the Commission reviewed the Management Retention Report and the Outcomes Report and voted to continue Vatterott-Berkeley on Warning due to continued turnover in management and student achievement outcomes that continue to be below benchmark for the following programs:

- 17-month Business Management (AOS) program;

⁴ See Commission letter dated September 1, 2016 for more detailed information regarding this action.

⁵ See Commission letter dated December 8, 2016 for more detailed information regarding this action.

⁶ See Commission letter dated July 14, 2017 for more detailed information regarding this action.

- 14-month Electrical Mechanics (Diploma) program;
- 14-month Heating, Air Conditioning, & Refrigeration Mechanics (Diploma) program;
- 21-month Pharmacy Technician (AOS) program;
- 17-month Recording Engineering & Producing with Management (AOS) program; and
- 10-month Recording Engineering & Producing (Diploma).

August 2017

At the August 2017 meeting,⁷ the Commission considered Vatterott-Berkeley's Application for Renewal of Accreditation and the school's applications for new programs. Given the Continued Warning Order for management retention and student achievement outcomes, the Commission deferred action on the Application for Renewal of Accreditation and the applications for new programs to be reviewed in conjunction with the Management Retention Report and Outcomes Report to be considered at the November 2017 meeting.

November 2017

At the November 2017 meeting,⁷ the Commission considered Vatterott-Berkeley's Application for Renewal of Accreditation, Management Retention Report, and Outcomes Report.

The Commission voted to take the following actions:

- Continue Vatterott-Berkeley on **Warning** with a subsequent review scheduled for ACCSC's May 2018 meeting;
- Direct Vatterott-Berkeley to **cease enrolling students** in the 21-month Pharmacy Technician (AOS) program (*Section VII (R)(5), Rules of Process and Procedure, Standards of Accreditation*); and
- Direct Vatterott College to limit/cap enrollments in the following programs:
 - Heating, Air Conditioning, & Refrigeration Mechanics (Diploma);
 - Recording Engineering & Producing (Diploma);
 - Business Management (AOS); and
 - Recording Engineering & Producing with Management (AOS).

May 2018 Review and Action

At the May 2018 meeting,⁸ the Commission considered its previous decision to continue Vatterott-Berkeley on Warning. Upon review of the January 24, 2018 Warning letter, and the school's response, the Commission voted to place Vatterott-Berkeley on **Probation** with a subsequent review scheduled for ACCSC's November 2018 meeting.

In addition, at the May 2018 meeting, the Commission placed each school within the system of Vatterott Education Centers, Inc. on Probation for financial concerns. Thus, the Commission continued to monitor the school's financial status via the System-wide Probation with review scheduled at the August 2018 meeting.

⁷ See Commission letter dated January 24, 2018 for more detailed information regarding this action.

⁸ See Commission letter dated July 11, 2018 for more detailed information regarding this action.

November 2018 Review and Recommended Action

At its November 2018 meeting, the Commission considered Vatterott-Berkeley's responses to the Commission's July 11, 2018 Probation Order and found that the school failed to demonstrate compliance with the *Standards of Accreditation* in the following areas (*Preamble, Standards of Accreditation*):

1. Vatterott-Berkeley failed to demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provides education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The Commission reviewed Vatterot-Berkeley's accreditation history and noted that since the school's renewal of accreditation in August 2014, the Commission has afforded Vatterott-Berkeley multiple opportunities to conduct meaningful assessments and implement improvement plans to improve student achievement in a significant number of the school's programs. Despite those opportunities, Vatterott-Berkeley has not met the burden of establishing and demonstrating compliance with the *Standards of Accreditation* in the area of student achievement outcomes.

Over the course of the review of Vatterott-Berkeley's on-going compliance with regard to student achievement, the school has failed to demonstrate the ability to consistently report graduation and graduate employment rates that meet established benchmarks for many of the school's active programs. The Commission has been monitoring seven (7) of the school's programs since 2015, none of which have met student achievement benchmarks for graduation and/or graduate employment over the period of review. In addition, six (6) additional programs that had no reportable data in 2015 have since consistently reported rates below benchmark. At the November 2017 meeting, the Commission directed the school to cease enrollment in the Pharmacy Technician program and directed the school to cap enrollments in four (4) other programs. Subsequently, the Commission found at its May 2018 meeting that the school again failed to demonstrate successful student achievement in several programs. The Commission directed the school to cease enrollments in four (4) additional programs, and cap enrollments in eight (8) programs.⁹

At the November 2018 meeting, the Panel found that Vatterott-Berkeley again failed to demonstrate substantial improvement in student achievement outcomes. Upon review of the data submitted by Vatterott-Berkeley in response to the Commission's July 11, 2018 letter, for the 14 programs under review, the school was only able to demonstrate that one (1) of the programs met benchmark (see Appendix A). In addition, in the 2018 Annual Report, 14 of the 17 currently approved programs reported graduation and/or graduate employment rates that are below benchmark.

As such, the Commission found that Vatterott-Berkeley failed to provide evidence that the school's on-going efforts to improve student achievement have been successful over the course of the Commission's review of this matter. Moreover, the Commission found that Vatterott-Berkeley has failed as an institution to operate programs that consistently minimally meet student achievement outcome benchmarks as required by ACCSC standards.

2. Vatterott-Berkeley failed to demonstrate continuity of management and administrative capacity through the reasonable retention of management and administrative staff (*Section I (A)(4), Substantive Standards, Standards of Accreditation*). At the time of the on-site evaluation for renewal of accreditation conducted in February 2014, the on-site evaluation team noted that Vatterott-Berkeley transitioned through four different campus directors since November 2012. In addition, the school had replaced three other top leadership positions since 2013. At the August 2014 meeting, the Commission granted Vatterott-Berkeley renewal of accreditation and required the school to submit a report on

⁹ See Commission letter dated July 11, 2018 for more detailed information regarding this action.

management retention. Despite the school's efforts to improve management retention, at the time of the response to the September 4, 2014 Reporting Enclosure, only two of the seven managers identified in the September 4, 2014 letter remained at the school. Subsequent review of management retention by the Commission found again that the school experienced turnover in key management positions. Specifically, the school continued to report turnover in the campus director and director of education positions. The school attributed the high turnover to the number of affiliated schools in the area allowing for movement between schools. Despite efforts to improve hiring practices and training for all managers, the stability of the management team did not improve over the period of review between 2014 and 2018. The school continued to experience turnover in key management positions such as the Campus Director and the Director of Education, often staying one year or less.

In response to the July 11, 2018 letter, the school again failed to demonstrate that the management team has remained in place. The current campus director has only been at the school for seven months, the director of admissions for one month, and the director of career development only two months. Upon review of the ongoing turnover, the Commission found that Vatterott-Berkeley failed to demonstrate the continuity of management and that given the on-going issues of student achievement at the school, Vatterott-Berkeley failed to demonstrate the administrative capacity to make a positive impact on the initiatives to improve student achievement outcomes.

Based on the foregoing grounds, the Commission voted to withdraw the accreditation of Vatterott-Berkeley and remove the school from the ACCSC list of accredited institutions effective as of December 5, 2018. In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reasons for the Withdrawal Order are made public and provided to the U.S. Department of Education, appropriate state agencies, and appropriate accrediting agencies.

TEACH-OUT PLAN

Pursuant to federal law, an accrediting agency recognized by the U.S. Department of Education must require a teach-out plan from an institution subject to an adverse accreditation decision to withdraw accreditation. Therefore, in accordance with *Section IV (1)(F)(1)(c) Rules of Process and Procedure, Standards of Accreditation* the Commission requires that Vatterott College submit a completed *ACCSC Institutional Teach-Out Plan Approval Form*,¹⁰ to demonstrate how, in the face of possible consequences of the withdrawal of accreditation, Vatterott College will ensure the opportunity for students to complete their program of study either by Vatterott College or through an agreement with another accredited institution(s) approved to offer a program comparative to Vatterott College's programs. The school's Teach-Out Plan should be submitted **on or before December 17, 2018**.

APPEAL AND REAPPLICATION PROCESS AND PROCEDURE

Vatterott College may opt to appeal the Commission's decision to revoke accreditation or 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 Vatterott 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 \$6,000, **on or before December 17, 2018**
- If Vatterott College elects to appeal this decision, the school's Grounds for Appeal must be submitted **on or before January 4, 2019**.

¹⁰ The *ACCSC Institutional Teach-Out Plan Approval Form* is available online at this [link](#).

- If Vatterott College elects not to appeal this decision, the school may submit comments **on or before December 17, 2018** 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*.
- If Vatterott College elects not to appeal this decision, the school may reapply for accreditation after a period of nine months (*Section VII (P)(4), Rules of Process and Procedure, Standards of Accreditation*). This means that the school may not submit an Application for Initial Accreditation until **September 5, 2019**. The school will be required to adhere to all applicable application processes set forth in the Commission's Rules of Process and Procedure.

Should you have any questions regarding the Commission's decision, please contact me at [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.

Executive Director

c: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Encls: Appendix A – Summary of Student Achievement
Letter of Intent to Appeal a Commission Decision
Standing Appeals Panel Members
Public Comment Disclosure Form

Appendix A – Summary of Student Achievement

Program Title (Credential)	Program Length Months	G/E	July 2015 Report Date	December 2015 Report Date	July 2016 Report Date	January 2017 Report Date	May 2017 Report Date	July 2017 Report Date	September 2017 Report Date	February 2018 Report Date	March 2018 Report Date	July 2018 Report Date	August 2018 Report Date	ACCSC Benchmark Rates	
Combination Welding Technology (AOS)	21	G	65%		27%		37%	46%			58%	66%	63%	42%/43%	
		E	79%		71%		78%	82%			81%	74%	74%	68%/70%	
Heating, Air Conditioning, & Refrigeration Mechanics (Diploma)	14	G	47%	44%	37%	41%		43%	41%		36%	37%	33%	51%/50%	
		E	70%	59%	72%	68%		75%	65%		53%	71%	86%	68%/70%	
Electrical Mechanic (Diploma)	14	G	38%	38%	40%	34%		48%	52%		44%	40%	40%	51%/50%	
		E	77%	76%	80%	50%		70%	69%		77%	75%	67%	68%/70%	
Building Maintenance Technology (AOS)	21	G	NRD		NRD			29%			27%		27%	26%	42%/43%
		E	NRD		NRD			88%		70%		72%	73%	68%/70%	
Automotive Technology (Diploma)	14	G	NRD		35%		26%	24%			38%	46%	42%	51%/50%	
		E	NRD		72%		78%	81%			89%	75%	75%	68%/70%	
Business Management (AOS)	17	G	31%	27%	22%	26%		30%	31%		45%	40%	39%	47%	
		E	74%	68%	71%	69%		70%	70%		48%	55%	57%	68%/70%	
Recording Engineering & Producing with Management (AOS)	17	G	46%	37%	29%	32%		33%	30%		30%	32%	32%	47%	
		E	56%	52%	71%	70%		71%	71%		71%	75%	74%	68%/70%	
Entertainment & Media Business w/Management (AOS)	19	G	NRD		27%		43%	37%		27%		35%	35%	43%	
		E	NRD		50%		82%	86%		55%		31%	31%	68%/70%	
Recording Engineering & Producing (Diploma)	10	G	55%	54%	63%	46%		36%	37%		46%	43%	42%	55%	
		E	46%	22%	25%	43%		50%	45%		35%	38%	28%	68%/70%	

Appendix A – Summary of Student Achievement

Program Title (Credential)	Program Length Months	G/E	July 2015 Report Date	December 2015 Report Date	July 2016 Report Date	January 2017 Report Date	May 2017 Report Date	July 2017 Report Date	September 2017 Report Date	February 2018 Report Date	March 2018 Report Date	July 2018 Report Date	August 2018 Report Date	ACCSC Benchmark Rates
Medical Assistant with Office Management (AOS)	17	G	NRD		NRD			31%		27%		21%	22%	47%
		E	NRD		NRD			55%		62%		50%	50%	70%
Medical Assistant with Limited Radiography	17	G	NRD		NRD			20%				24%	24%	47%
		E	NRD		NRD			78%				71%	69%	68%/70%
Autobody & Alternative Fuel Vehicle Repair Technician	21	G	NRD		NRD			NRD				39%	39%	43%
		E	NRD		NRD			NRD				72%	72%	70%
Entertainment & Media Business (Diploma)	10	G	100%		100%			100%				50%	40%	47%
		E	50%		100%			100%				33%	50%	70%
Pharmacy Technician (AOS) In Teach-Out - 10/2019 last grad date	10	G	18%		13%			23%				17%	17%	47%
		E	88%		71%			58%				47%	47%	70%

NRD = No Reportable Data

Highlighted Rates are below ACCSC benchmark rates.