ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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December 21, 2012

VIA E-MAIL
(jay.murvine@summitcollege.edu)
(gaylene.jones@summitcollege.edu)

Mr. Jay Murvine, CEO
Summit College
851 South Cooley Drive
Colton, CA 92324

Re: Interim Report Reviewed;
Institutional Show Cause Issued;
Enrollment Limitations –
LVN (Colton), LVN (Anaheim);
Final Program Approval –
Optical Dispensing Technician (Colton);
Additional Interim Report Required;
ACCET ID #0865

Dear Mr. Murvine:

At its December 2012 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) reviewed the institution's interim report submitted in response to the August 23, 2012 Commission action letter which originated with a review of its 2011 completion and placement data resulting in the issuance of administrative Programmatic Show Causes (letter dated July 9, 2012) due to below-benchmark placement rates and the response from the institution received July 23, 2012. That action continued the Programmatic Show Cause status and directed the institution to submit an interim report to include the following two items: 1) updated Document 28.1s – Completion and Placement Statistics, for calendar year 2011 and year-to-date January – July, 2012 for the following below-benchmark programs: full-time LVN (Colton and Anaheim campuses), part-time LVN (Colton and Anaheim campuses), Business Information Assistant (Colton campus), Dental Assistant (Colton campus), Medical Assistant-Administrative and Clerical (Colton and Anaheim campuses), and Medical Billing/Coding (Colton and Anaheim campuses), together with full supporting documentation for all placements and waivers referenced to the Onsite Sampling Verification: Completion, Placement, and Academic Data form, as well as job descriptions for the following graduates: A. Weatherington, J. White, D. Anderson, A. Diaz, P. Cesena, G. Gonzalez, and D. Crow-Sebae; and 2) a complete list of 2011 and 2012 (January – July, 2012) LVN graduates whose license applications had been accepted by the state, clearly identifying those who had received their license, organized by location, with student name, graduation date, NCLEX test date, license date, and placement date, as applicable.

Upon its review of the institution's interim report, dated October 23, 2012, the Commission voted to issue an Institutional Show Cause directive based on serious issues regarding placement documentation and below-benchmark placement rates, including the following substandard completion and placement rates for the period January 1 – July 31, 2012, as noted in the institution's interim report:

Program	**Completion (net starts/completers)**	**Placement (eligible/placed)**
Colton Campus		
LVN full-time	not submitted	25.41% (122/31)
LVN part-time	not submitted	3.85% (52/2)
Dental Assistant	not submitted	62.07% (29/18)
MA – Admin/Clerical	not submitted	60.71% (56/34)
Medical Billing & Coding	not submitted	48.28% (29/14)
Anaheim Campus		
LVN full-time	not submitted	not submitted
LVN part-time	not submitted	2.17% (45/1)
MA – Admin/Clerical	83.33% (36/30)	61.54% (26/16)
Medical Billing & Coding	73.33% (15/11)	60.00% (10/6)

Further, the Commission reviewed the placement rates and documentation for the LVN program for 2011 and 2012 to date in combination with the significant growth rates of student enrollment in those programs at both campuses (a 52.94% increase at Colton, rising from 306 students in the LVN program alone in fiscal year 2011 to 468 students in FY 2012, and a 25.91% increase at Anaheim, rising from 193 students in the LVN program in FY 2011 to 243 students in FY 2012), and voted to limit enrollments in the LVN program for the period January 1 – April 30, 2013 to 60 new students at the Colton campus and 40 new students at the Anaheim campus.

The Commission reviewed the licensing information provided by the institution, and found that many students had lengthy periods between graduation and their testing date, although generally receiving their license within two months after testing. However, the testing and licensing information provided by the institution further indicated that a concerted effort by the institution is needed to license and place its graduates. Adjusted placement rates provided by the institution, which were calculated using only those students who had received their licenses, indicated that the institution would not meet benchmark for either of its programs at Colton even under the ideal situation where all graduates held licenses. Although the institution did not provide these adjusted placement rates for the 2012 programs at Anaheim, the calculated adjusted placement rates from the raw data submitted indicated that both programs at Anaheim would be significantly under benchmark. The institution cannot expect that, even given unlimited amounts of time, all of its graduates will take and pass the NCLEX. The delays in licensing may well be a factor hampering the institution's efforts to place students in a timely manner, but as indicated by the adjusted placement rates, these delays are not the primary barrier to reaching benchmark placement rates for these LVN programs.

Of further concern to the Commission, the placement documentation provided by the institution indicated that a large amount of the documentation for placements was either incomplete or missing, including no documentation being provided regarding the full-time LVN program for 2012 at Anaheim. Of the remaining programs, a total of 144 placements and waivers (97 from 2011 and 47 from 2012) were discounted for having incomplete or inaccurate documentation. Forty-two placements did not include verification of 30 days' employment, and thirteen more did not provide any indication that the graduate had worked for 30 days. Sixty-three placements did not include attestations for part-time, temporary, or continuing employment, and eleven more had only partial attestations that did not include all required elements. Placements were included which did not provide the graduate's job title or information regarding whether the employment was full- or part-time, and waivers were not consistently completed with all

necessary elements. Eight students listed on the On-Site Verification forms did not have any placement documentation at all. The institution included placement documentation for E. Perez (LVN p/t Colton 2011) with a note saying the student "work a few shifts and gave notice to work elsewhere," which does not inspire any cause for confidence that the student worked for 30 days; further, placement documentation was included for B. Jimenez (MA Colton 2012) indicating that the student had been placed as an LVN, an inexplicable outcome. The Commission is seriously concerned about the lack of systematic and effective practices to ensure accurate and complete documentation for placements, as this information must definitively evidence the validity of the institution's completion and placement statistics, already below benchmark.

Therefore, the Commission directed that an additional interim report is required, which must include the following specific items:

1. A narrative explanation relative to the inordinate amount of discounted placements noted above, to include evidence of comprehensive training of the career services department to ensure the ACCET Document 28 – Completion and Placement Policy is understood and implemented by all staff, as well as a revised policy to ensure thorough oversight of the placement tracking process.

2. A narrative plan outlining the aggressive strategies in place to both increase the number of LVN students registering for the NCLEX exam and shorten the lag time between completion of the program and sitting for the exam. This plan must also address the institution's strategies to dramatically increase the institution's LVN placement rates. Alternatively, the institution must provide a plan to cease enrollments in the LVN programs and provide a teach-out plan, in accordance with Document 32 – Teach-Out/Closure Policy.

3. Updated Document 28.1s – Completion and Placement Statistics, for the period January 1 to October 31, 2012, for the following programs: full-time LVN (Colton and Anaheim campuses), part-time LVN (Colton and Anaheim campuses), Business Information Assistant (Colton campus), Dental Assistant (Colton campus), Medical Assistant-Administrative and Clerical (Colton and Anaheim campuses), and Medical Billing/Coding (Colton and Anaheim campuses), together with full supporting documentation for all placements and waivers referenced to the attached On-site Sampling Verification: Completion, Placement, and Academic Data form for each Scheduled to Graduate (column 3) cohort on the respective 28.1s to be submitted with your response. The institution is reminded that the required documentation elements for verification of employment are outlined in ACCET Document 28 – Completion and Placement Policy. The institution must provide complete Document 28.1s that include both completion and placement data, as is always required when submitting Document 28.1. The institution is further reminded that the Document 28.1s and the accompanying On-Site Verification forms must include all students, not simply those who have completed the program.

4. A narrative analysis and explanation for the high percentage of waivers (5 of 6) for the 2012 part-time LVN program at the Anaheim campus relative to graduates who waived placement assistance due to a "prior conviction", and explanations as to how B. Jimenez (MA Colton 2012) was placed as an LVN after graduating from the Medical Assisting program.

A copy of this report, **including the attached interim report cover sheet**, must be emailed to **interimreports@accet.**org no later than **March 1, 2013**.

The Commission also voted to grant final approval to offer the Optical Dispensing program (66 Quarter Credit Hours/960 Clock Hours) at the Colton main campus. This program, therefore, is included within the main campus' grant of accreditation. The U.S. Department of Education (USDE) and the appropriate state licensing authority will be notified of this action by copy of this correspondence. Please refer to applicable regulations, contact the respective USDE and BPPE departments, or seek conferral with appropriate sources for guidance to ensure compliance with those requirements. The Commission's action was based upon its review of the institution's application for program approval, the on-site visit team report (visit conducted October 22, 2012) and the institution's response to that report, dated November 20, 2012.

As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at www.accet.org.

Further, while under a Show Cause directive, the institution is restricted from making any substantive changes including, but not limited to, new programs, major program revisions, new branch campuses or other new sites, or relocations out of the general market area. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Your demonstrated capabilities and commitment in support of the institution's accredited status are essential to a favorable outcome in this process. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,

Roger J. Williams
Executive Director

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Enclosures: Interim Report Cover Sheet
On-Site Sampling Verification: Completion, Placement, and Academic Data form

c: Ms. Kay Gilcher, Chief, Accreditation Division, USDE (aslrecordsmanager@ed.gov)
Ms. Martina Fernandez-Rosario, ACD - San Francisco/Seattle, USDE (martina.fernandez-rosario@ed.gov)
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