

October 26, 2021

ELECTRONIC DELIVERY

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Patrick Melnick
Director
The North Coast College
11724 Detroit Avenue
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School #M000710

Warning

Dear Mr. Melnick:

At the August 2021 meeting, the Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") considered the Outcome Report submitted by The North Coast College ("TNCC") located in Lakewood, Ohio. Upon review of the May 29, 2020 Commission letter and the school's April 14, 2021 and June 16, 2021 responses, the Commission voted to place The North Coast College on **Warning and to direct the school to cap/limit enrollment in the Fashion Design and Interior Design program offerings**. In addition, as the school is in the renewal process, the Commission voted to refer this matter for review in conjunction with the school's re-evaluation for Renewal of Accreditation and evaluation scheduled for November 15-17, 2021. The reasons for the Commission's decision and the Commission's requirements for the school to demonstrate compliance are set forth below.

History of the Commission's Review

Outcomes Reporting History

- At the June 2017 meeting, the Commission considered the supplemental 2016 ACCSC Annual Report graduation and employment information submitted by TNCC, formerly Virginia Marti College of Art & Design. The Commission subsequently voted to place the school on Outcomes Reporting for the 24-month Fashion Design (AAB) program and place the school on Heightened Monitoring for the Interior Design (AAB) 48-month program.
- At the May 2018 meeting, the Commission considered the Outcomes Report and supplemental 2017 Annual Report information submitted by TNCC. The Commission voted to continue TNCC on Outcomes Reporting for the 24-month Fashion Design (AAB) program, the 48-month Graphic Design/Web Design (AAB) program, and the 48-month Interior Design (AAB) program.
- At the March 2019 meeting, the Commission considered the Outcomes Report and supplemental 2018 Annual report information submitted by TNCC. The Commission voted to continue TNCC on Outcomes Reporting for the 24-month Fashion Design (AAB) program, the 24-month Interior Design (AAB) program, and the 48-month Interior Design (AAB) program.
- At the November 2019 meeting, the Commission considered the Outcomes Report submitted by TNCC. The Commission voted to continue TNCC on Outcomes Reporting for the 24-month Fashion Design (AAB) program and the 48-month Interior Design (AAB) program.
- At the May 2020 meeting, the Commission considered the Outcomes Report submitted by TNCC. The Commission voted to continue TNCC on Outcomes Reporting for the 24 and 48-month Fashion Design (AAB) programs, the 24 and 48-month Fashion Merchandising (AAB) programs, the 24-month Graphic Design (AAB) program, and the 24 and 48-month Interior Design (AAB) programs.

August 2021 Meeting Review and Action

At the August 2021 meeting, the Commission reviewed TNCC's Outcomes Report responses regarding the school's continued efforts to demonstrate successful student achievement through acceptable rates of student graduation and graduate employment in the career fields for which the school provides education (*Section VII (B)(1)(b) Substantive Standards, Standards of Accreditation*). In response to the May 29, 2020 Commission letter, the Commission considered the previously reported student achievement data and the most recently reported student achievement rates using a January 2021 Report Date as listed below:

Program	Length In Months	G/E	Feb. 2017 Report Date	Feb. 2018 Report Date	Dec. 2018 Report Date	July 2019 Report Date	Jan. 2020 Report Date	Jan. 2021 Report Date	ACCSC Benchmark Rates
Fashion Design (AAB)	24	G	14%	20%	7%	15%	29%	14%	40%
		E	100%	100%	100%	100%	100%	100%	70%
Fashion Design (AAB)	48	G					13%	14%	40%
		E					100%	100%	70%
Interior Design (AAB)	24	G			25%	50%	50%	17%	40%
		E			100%	75%	67%	50%	70%
Interior Design (AAB)	48	G	75%	50%	0%	0%	50%	25%	40%
		E	67%	0%	N/A	N/A	67%	100%	70%
Fashion Merchandising (AAB)	24	G					13%	*	40%
		E					0%	*	70%
Fashion Merchandising (AAB)	48	G					33%	28%	40%
		E					75%	67%	70%
Graphic Design/Web Design (AAB)	24	G					22%	29%	40%
		E					50%	100%	70%

G = Graduation; E = Employment;

* Although the school provided a roster of students for the 24-month Fashion Merchandising (AAB) program, the response did not include a Graduation and Employment Chart for this program

The Commission found that for the school's programs with reportable data, TNCC reported graduation and employment rates as highlighted above that fall below ACCSC's student achievement benchmark rates.¹ The school's response discusses TNCC's continued efforts to address the issue of below-benchmark student achievement and provides information pertaining to the admissions requirements and process; an assessment of the curriculum modifications; updated student services pertaining to student retention and graduation and employment activities; an evaluation of current retention trends; and a review of PAC meeting minutes conducted since February 4, 2020 for the Fashion Design (AAB), Fashion Merchandising (AAB), Graphic Design (AAB) and Interior Design (AAB) programs.

The school provided an updated 2021 Student Achievement Improvement Plan for each program area. The school noted the curriculum modifications including the transition from 10-week quarter programs to 15-week semester programs "are projected to show improvements in student retention, graduation/employment rates by 2022." Other Student Achievement Improvement Plan initiatives include greater transparency of financial obligations for students upon admissions, increased involvement by the Department Chair and

¹ Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VI- Student Achievement Rates.

Student Services Department during the first and second semester of student enrollment, a revitalized internship program, increasing the impact of the committee on retention, adding questions to student surveys, and a revised complaint resolution process. Each program area also continues to implement curriculum modifications to increase the marketability of graduates in their employment sector. In addition, TNCC described the school's continued retention strategies and initiatives and discussed the unprecedented circumstances presented by COVID-19 that deeply interrupted the school's continued efforts.

The Commission found that the student achievement improvement plans for each program and department area appear to contain positive strategies, but the Commission noted that the school's response lacks documentation to show the implementation of the proposed strategies. Despite TNCC's efforts to identify and address the root causes of these below-benchmark student achievement rates, the school has failed to raise the programs' student achievement rates to acceptable levels thereby also failing to show that the school's programs are meeting student needs and adequately preparing students for sustainable employment in the field of study.

In addition, although the Commission understands and acknowledges the impact of the pandemic on schools and students alike, the school's student achievement difficulties far pre-date the onset of the pandemic. Accordingly, the school may certainly point to the impact of pandemic as a mitigating factor, but given TNCC's reporting history, it must do so in a manner that provides specific student-level information expressly detailing the correlation between the pandemic and the school's current/reported rates of student achievement. Going forward, the Commission strongly encourages the school to submit contemporaneous data in addition to the data reported through the Graduation and Employment Charts.

The Commission also noted that the Program Advisory Committee meeting minutes did not meet ACCSC's standards. Specifically, there are not detailed minutes that include a description of all members in attendance (i.e., names, titles, affiliations); the date, time, and location of the meeting; and a comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee members (*Section II (A)(6)(c) Substantive Standards, Standards of Accreditation*).

Additionally, in reviewing employment information submitted as part of the response, the Commission noted the school did not demonstrate that the employment is related to the student's program of study (*Appendix VII-Guidelines for Employment Classification, Standards of Accreditation*). Specifically, the Commission questioned how many of the graduate's employment placements, including places of employment and job titles, were related to the graduate's specific program objectives.

Given the school's history of reporting below-benchmark student achievement across several programs, and especially considering the fact that as of the July 2021 Report Date, the graduation and employment rates across these same programs continue to fall below benchmark, the Commission concluded that TNCC did not provide strong enough evidence to support that it can operate the above listed programs in compliance with standards in a sustainable manner. The Commission recognized the school's efforts to enhance student achievement; however, the Commission cannot overlook that the school has continually reported below benchmark graduation/employment rates across several programs. The Commission found that despite its formal monitoring of the reported rates of student achievement and concordant institutional actions, and the school's formal reporting on its continual efforts to enhance and support student achievement, TNCC has been unable to demonstrate a level of improvement that would bring the programs' rates of student achievement to a minimally acceptable level, as required by accrediting standards.

Enrollment Cap

While the Commission has opted to afford TNCC an additional opportunity to demonstrate improved student achievement outcomes, the Commission has also concluded that TNCC must focus its efforts on its success strategies for its current student population. Given that the 24-month Fashion Design (AAB) and 48-month Interior Design (AAB) programs have been on continuous outcomes monitoring since February 2017, and five (5) additional programs² have since seen graduation and/or employment rates fall below benchmark rates, the Commission directs the school to **cap enrollment for the Fashion Design program and the Interior Design program at no more than 5 students. This enrollment cap is in immediate effect and until the Commission removes the enrollment cap directive** (Section VII (R), Rules of Process and Procedure, Standards of Accreditation).

These program-level actions are meant to allow the school an opportunity to focus on the strategies and policy changes described in the school's response to improve graduate employment for the current student population. Through these actions, it is the Commission's intention to give TNCC an ongoing opportunity to demonstrate improvement. However, if the school cannot show improvement, the Commission is likely to revoke the approval of these programs or to take a larger institutional action if the other programs offered at the school also do not show improvement (i.e., Fashion Merchandising, Graphic Design/Web Design, etc.).

Since TNCC is in the renewal of accreditation process, the Commission voted to continue the school on Outcomes Reporting with the next review to be considered in conjunction with the school's renewal application and evaluation.

As such, the Commission directs the school to prepare the following for review by the evaluation team:

- a. Documentation demonstrating ongoing institutional assessment and improvement activities as it pertains to student achievement outcomes;
- b. Policies and procedures pertaining to student achievement outcomes, particularly those related to admissions, student services, and graduate placement activities;
- c. Program objectives as published in the catalog for the 24 and 48-month Fashion Design (AAB), 24 and 48-month Interior Design (AAB), 24 and 48-month Fashion Merchandising (AAB), and 24-month Graphic Design/Web Design (AAB) programs, that support the school's employment classifications;
- d. A copy of any PAC meeting minutes conducted in 2021 for the Fashion Design (AAB), Interior Design (AAB), Fashion Merchandising (AAB), and Graphic Design (AAB) programs ensuring the minutes are appropriately formatted to include:
 - i. The date, time, and location of each meeting;
 - ii. A comprehensive and clear description of the review of and commentary made by each of the Program Advisory Committee members and school representatives;
- e. ACCSC Retention Charts³ for the following programs using a **November 2021 Report Date**:
 - i. 24-month and 48-month Fashion Design (AAB)

² 24-month Interior Design (AAB), 48-month Fashion Design (AAB), 24 and 48-month Fashion Merchandising (AAB), and 24-month Graphic Design/Web Design (AAB)—

³ Available for download at <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>

- ii. 24-month and 48-month Interior Design (AAB)
- iii. 24-month and 48-month Fashion Merchandising (AAB)
- iv. 24-month Graphic Design/Web Design (AAB)
- f. Graduation and Employment Charts for the following programs using a **November 2021 Report Date**:
 - i. 24-month and 48-month Fashion Design (AAB)
 - ii. 24-month and 48-month Interior Design (AAB)
 - iii. 24-month and 48-month Fashion Merchandising (AAB)
 - iv. 24-month Graphic Design/Web Design (AAB)
- f. Summary information for each Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
 - i. For each student start, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Cosmetology	01/10/17	06/01/2018	N/A
2	12346	Cosmetology	01/10/17	N/A	01/10/2018

- ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following information:

Count	Student ID	Program	Start Date	Reason Unavailable	Description of the Documentation on File
1					

- iii. For each graduate classified as employed in the field⁴ (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ⁵ (i.e., graduate or employer)
1									

- iv. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

- v. From the list in (iii.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

- vi. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following information:

⁴ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

⁵ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File
1						

Due to the school's history of reporting below-benchmark student achievement outcomes, continued failure to demonstrate compliance can result in an escalation of action to Probation status. Therefore, it is of utmost importance that TNCC make every effort to demonstrate compliance in these areas as part of the response to this Warning action.

Warning Restrictions:

Pursuant to *Section VII (K)(9), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

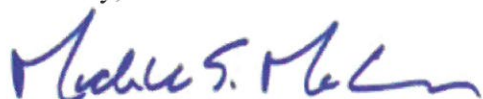
Notification to Students

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(8) Rules of Process and Procedure, Standards of Accreditation*). A copy of this notification should be provided to the evaluation team.

The evaluation team will review the above requested information to include the graduation and employment data and supporting documentation. The evaluation team will prepare a report of its findings to which the school will have an opportunity to respond. The Commission will review the team's report and the school's response and will make a determination regarding the need for any further monitoring.

For assistance or additional information pertaining to this matter, please contact me directly at mccomis@accsc.org.

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

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