



Transmitted by electronic mail only: LRohmann@legacyed.com

August 11, 2022

ID#: I-026

Ms. LeeAnn Rohmann
President/CEO
Integrity College of Health
1460 N. Lake Avenue, Suite 102
Pasadena, CA 91104

Dear Ms. Rohmann:

The Commission, at its July 2022 meeting, reviewed the record¹ related to outcomes for the Vocational Nursing – Certificate program. Based on review and discussion, the Commission acted to place the program on **program specific warning and directs the institution to justify why the program approval should not be withdrawn from the institutional grant of accreditation.**

A program specific warning is notification that if the institution does not take corrective action to address specific compliance concerns, the program approval could be withdrawn. According to Chapter III, Section A, Subsection 10, failure to demonstrate at least a 70 percent placement rate raises a question whether accreditation requirements are being met. An institution is required, at minimum, to demonstrate that it has undertaken an analysis of data, identified areas needing improvement, and has taken corrective action through the development and implementation of an action plan. The program specific warning process provides another opportunity for the institution to submit such a plan and evidence of its effectiveness in improving outcomes, in particular its placement rate.

According to our records, the following placement rates for the **Vocational Nursing – Certificate** program have been reported to date:

- November 2019 – The institution reported a placement rate of 44% on its 2018-2019 Annual Report.
- May 2020 – The institution submitted an updated placement rate of 64% for the 2018-2019 reporting year.
- October 2020 – The institution submitted an updated placement rate of 64% for the 2018-2019 reporting year.
- December 2020 – The institution reported a placement rate of 13% on its 2019-2020 Annual Report.

¹ The record includes the 2018-2019, 2019-2020, and 2020-2021 Annual Reports, outcome reporting letters dated February 2020, August 2020, February 2021, August 2021, and February 2022, and the institution's response to such letters.

- May 2021 – The institution submitted an updated placement rate of 50% for the 2019-2020 reporting year.
- October 2021 – The institution submitted an updated placement rate of 50% for the 2019-2020 reporting year.
- November 2021 – The institution submitted a placement rate of 45% on its 2020-2021 Annual Report.
- May 2022 – The institution submitted an updated placement rate of 57% for the 2020-2021 reporting year.

The institution, therefore, is directed to submit sufficient information and documentation to show the program has achieved a placement rate of at least 70% including, but not limited to, the following:

1. A complete ABHES Back Up Documentation Form to support the reported rate. The required form can be found on the ABHES website at <https://abhес.org/resources/#Reporting>.
2. A table identifying any graduates whose placement categorization (placed, unavailable, or placed out of field/not placed) has changed since your last submission. The table must include a) graduate name; b) program; c) previous category; and d) current category.
3. Rationale and additional documentation to justify graduates currently categorized as:
 - i. Placed with a job title that does not match the title of the approved program.
 - ii. Unavailable for placement due to health-related issues, military obligations, incarceration, continuing education status, or death. Examples of documentation may include but are not limited to a doctor's note, military orders, arrest documentation, enrollment agreement, acceptance letter, or death certificate.

If the institution utilizes a graduate attestation, it must provide a copy of its campus-level policy to validate the attestation. As a reminder, all graduate attestations must be signed and dated by the graduate.
4. An analysis identifying the reasons why the program's placement rate continues to be below 70%. The analysis must also detail the circumstances for graduates not placed or placed out of field.
5. An updated action plan documenting the following (1) a description of the effectiveness of the institution's action plan submitted in response to the February 17, 2022, letter including an analysis of its successes and failures, (2) what new activities or initiatives the institution is taking to improve the rate based on its assessment, and (3) a timeline for when the institution will achieve the 70% placement rate.

Maximum Timeframe

The maximum period of time the Commission may allow for an institution to be brought into compliance with ABHES requirements is stated in Chapter III, Section C of the *Accreditation Manual*. The findings of non-compliance set forth above were first identified by the Commission in its letter dated August 14, 2020.

Accordingly, the institution must demonstrate compliance within the maximum timeframe with a final response due November 1, 2022, for review at the Commission's January 2023 meeting. The Commission, however, has discretion to take a negative or adverse action before the expiration of the maximum timeframe when warranted.

The Commission will review the institution's response to this letter and assess its progress toward attaining compliance with the standard at the January 2023 meeting. At that time, the Commission may withdraw the approval of the program or may, for good cause, extend the period for achieving compliance. A good cause extension requires a showing that there has been significant improvement in the deficient area(s) and/or there is a need for additional time to achieve the required 70% placement rate.

The program may request a good cause extension by submitting a completed *Good Cause Extension Request* form available for download at <https://abhes.org/resources/#Forms> with its response due on November 1, 2022. If the Commission grants a good cause extension, it will limit the timeframe to no longer than 12 months from the program's original maximum timeframe. This would require a final response in time for consideration at the Commission's January 2024 meeting.

Submission Procedure and Requirements

The institution is directed to submit the following:

1. Teach-Out Plan and student disclosure

By **August 22, 2022**, the institution must submit, online via [DropBox Forms/Applications](#) its Teach-Out Plan for the Vocational Nursing – Certificate program and the corresponding *Teach-out Plan Form* (available for download from the ABHES website at <https://abhes.org/resources/#Forms>).

The institution must include in its submission evidence it has published a student disclosure notice **within seven business days of the date of this letter** informing enrolled and prospective program students of the Program Specific Warning action as the reason the program Teach-Out Plan is being required.²

If the institution has decided to stop enrolling and officially teach out the program, the institution must submit by **August 22, 2022**, a completed *Teach Out Agreement Form* available for download at <https://www.abhes.org/resources/#Forms>. This form must be submitted to ABHES under separate cover and not as part of the institution's response. Upon receipt and approval, ABHES will issue a written acknowledgement which must be included with the institution's response to this letter.

2. Additional information regarding the standard-related directives

By **November 1, 2022**, the institution must submit, online via [DropBox Commission Responses](#), its response to the standard-related directives identified within this letter. The file name must include the ABHES ID#, RSP to Aug 2022 PSW, and date of submission (ex: I-100_RSP to Aug 2022 PSW Letter_112022).

² This disclosure is also required under 34 Code of Federal Regulations § 668.43(a) (19) which states: "If the institution is required to maintain a teach-out plan by its accrediting agency, notice that the institution is required to maintain such teach-out plan and the reason that the accrediting agency required such plan under § 602.24(c)(1). . ."

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Your submission must include a cover letter, narrative, exhibits and the completed “Notice for Commissioner Recusal” form (enclosed). Please refer to the ABHES [Preparing Your Response](#) Guide for instructions on organizing and finalizing your response.

The institution is advised that failure to respond as per the requirements outlined within this letter by the due dates will result in a late-fee assessment in accordance with Appendix G of the *Accreditation Manual*.

Appearance

If, as part of its response to this directive, the institution wishes to appear before a panel of the Commission via teleconference, its request to appear must be submitted to ABHES online via [DropBox Commission Responses](#) by **August 22, 2022**, and named "ABHES ID#_Request to Appear." A teleconference appearance fee of \$2,000 will be assessed in accordance with Appendix G, Fees, of the *Accreditation Manual*. Payment of any fees are to be remitted electronically. Please contact the Accounting Department at accounting@abhes.org or (703) 917-9503 to obtain an invoice.

Disclosure

ABHES will not review, consider, or process substantive changes (as defined in III.B.2. of the *Accreditation Manual*) relating to the Vocational Nursing – Certificate program while the program is under a program specific warning directive unless the institution demonstrates that the substantive change is likely to resolve non-compliance. An institution’s request for acceptance of a substantive change application must include justification for the change and its effect on the program’s operation. This restriction does not apply to a Teach Out Agreement.

The U.S. Department of Education, the appropriate State licensing or authorizing agency, the appropriate accrediting agency, and the public have been notified of this action in compliance with 34 Code of Federal Regulations § 602.26 et seq and Chapter III of the *Accreditation Manual*.

If you have any questions concerning this correspondence, please contact staff liaison, Holly Doering, at hdoering@abhes.org or at (571) 282-0047.

Sincerely,



India Y. Tips
Executive Director

Attachment: Notice for Commissioner Recusal

C: Leeza Rifredi, California Bureau for Postsecondary Education