

June 8, 2022

**ELECTRONIC DELIVERY**

██████████  
██████████  
Hussian College  
1500 Spring Garden Street  
Philadelphia, Pennsylvania 19103

*System-Wide Warning*

Re: Hussian College – Philadelphia, Pennsylvania (#M000404)  
Hussian College – Clarksville, Tennessee (#B072782)  
Hussian College – Los Angeles, California (#B072486)  
Daymar College – Murfreesboro, Tennessee (#B072783)  
Daymar College – Columbus, Ohio (#B072781)  
Daymar College – Nashville, Tennessee (#B072784)

Dear ██████████

At the May 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Outcomes Findings and Outcomes Reports for five ACCSC accredited Hussian College and Daymar College campuses along with the main school Hussian College located in Philadelphia, Pennsylvania (“Hussian College System of Schools”).<sup>1</sup> Upon review of the record in these matters, the Commission raised concerns with regard to: a) the totality of the institutional and programmatic student achievement of outcomes throughout these campuses; b) the extent to which the same or similar issues impacting student achievement at the individual campuses extend throughout the system of affiliated schools; and c) the extent to which the individual campuses and programs can identify, address, and overcome specific issues affecting student achievement. Therefore, the Commission determined that a system-wide review of these issues is merited and voted to place the ACCSC-accredited schools operated by Hussian College on System-Wide Warning with a subsequent review scheduled for the Commission’s November 2022 meeting.

### **Summary of the Commission’s Review**

In addition to reviewing the materials presented for the five campuses referenced in Appendix I, the Commission also reviewed the student achievement outcomes for system’s main school, Hussian College located in Philadelphia, Pennsylvania (“Hussian College-Philadelphia”), as outlined in Appendix II included as part of this letter. While the Commission accepted Hussian College-Philadelphia’s Outcomes Report and placed the campus on Heightened Monitoring for its BFA Art program<sup>2</sup>, the Commission’s review of the remainder of the ACCSC accredited Hussian College System of Schools programs showed a systematic issue requiring more immediate attention and action.

Across the Hussian College System of Schools at the time of review there were 100 total programs. In reviewing the submitted documentation and recent program teach-out and discontinuation forms, the Commission acknowledged that the Hussian College System of Schools chose to discontinue or teach out 20 programs and to cease enrollment in an additional seven programs as the schools evaluate the viability of those programs. Minus the noted program discontinuations and teach outs, there are 80 “active” programs remaining. However, of those programs only 32 have reportable graduation and employment rates using ACCSC’s reporting formula as of the 2021 Annual Report. Of those 32 programs, 30 programs, or 93.75%, reported a graduation and/or employment rate below ACCSC’s established benchmark rate. Furthermore,

<sup>1</sup> See Appendix I included as part of this letter for a list of institutions, actions, and materials considered.

<sup>2</sup> See the Commission’s February 24, 2022 letter.

11 of the reported employment rates are below 50%, significantly lower than ACCSC's benchmark employment rate of 70%. In addition, while a review of the submitted retention rates for those programs with reportable rates showed some improvements, the majority of retention rates remain below graduation benchmarks.

As required by ACCSC accrediting standards, each ACCSC accredited campus in the Hussian System of Schools must be able to demonstrate successful student achievement, including acceptable rates of student graduation and graduate employment<sup>3</sup> across the array of programs offered (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). Based on a review of the materials listed in Appendix I, the Commission noted the below benchmark student achievement outcomes that are outlined in this letter below. Even though the Commission noted that the campuses are teaching out or have discontinued several programs that failed to demonstrate successful student achievement, the Commission also recognized the fact that there may be an additional 48 additional programs that are as of yet without reportable rates. Given that more than 93% of the school reportable programs have reported at least one below benchmark outcomes, the Commission is concerned with the totality of student achievement among both currently reportable rates as well as those yet reportable.

In reviewing the documentation and student achievement improvement plans submitted by the individual campuses, the Commission noted the use of system-wide initiatives such as the realignment of term length and credit load, changes to re-entry practices, changes to the entrance assessment and admissions policies, and changes to delivery model for first-term students. As noted in the responses, the Hussian College System of Schools appears to have seen some improvements from these initiatives, for example as shown by the system-wide analysis of the impact of changes to reentry practices with statistics presented in the Murfreesboro, Columbus, Clarksville, and Nashville campuses' responses. However, the Commission noted there appears to be a substantive lack of program-specific analysis and initiatives across the overall system of schools.

In some cases, the schools did show that some low rates of graduation and employment were a result of school operations prior to the change of control/ownership, meaning that Hussian College "acquired" the school's previous poor performance. While the Commission understands Hussian College-Philadelphia's timeline of acquisition and recognizes the initiatives put forward so far, including the teach out, discontinuation, and ceasing of enrollment, the Commission is concerned about the breadth and severity of student achievement issues across multiple campuses and as such is interested in seeing the results of the Hussian College System of Schools' efforts and efficacy in establishing programmatic, institutional, and system-wide initiatives resulting in improved student achievement outcomes.

### **Campus-Level Reporting**

The following outlines the most recent student achievement rates at each of the schools reviewed at the May 2022 meeting. Additionally, the individual school's responses to Student Satisfaction Reporting and concerns raised during evaluations are included, as applicable.

#### **Hussian College-Los Angeles, California (School#B072486)**

##### **Outcomes Report:**

In response to the June 7, 2021 Commission letter, Hussian College in Los Angeles, California ("Hussian College-Los Angeles"), reported the following student achievement rates using a January 2022 Report Date on the Graduation and Employment Chart:

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<sup>3</sup> *Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.*

| Program (Credential)           | Length in Months | Reported Graduation Rate | ACCSC Benchmark Graduation Rate | Reported Employment Rate | ACCSC Benchmark Employment Rate |
|--------------------------------|------------------|--------------------------|---------------------------------|--------------------------|---------------------------------|
| Acting (BFA)                   | 32               | 52%                      | 40%                             | 64%                      | 70%                             |
| Commercial Dance (BFA)         | 32               | 54%                      | 40%                             | 50%                      |                                 |
| Film and Digital Content (BFA) | 32               | 69%                      | 40%                             | 64%                      |                                 |

This represents three of four reportable programs offered by Hussian College-Los Angeles, California.

The highlighted employment rates above fall below ACCSC’s student achievement benchmark rate. Hussian College-Los Angeles stated that the school has not made and does not plan to make any enhancements or modifications to the admission requirements and process; curriculum and/or training equipment; teaching methods and/or materials; learning resources; or student services. Hussian College-Los Angeles stated that career services and employer engagement “is the area where the school’s student achievement plan is focused.” Specifically, the school has changed in the internal staffing model to include dedicated Career Services staff at the institution. Additionally, the school noted that although “disrupted during the 2020-2021 school year due to COVID,” the school “continuously incorporates industry guest lecturers and activities into its culture” and that “the school has resumed these types of activities in the current 2021-2022 school year.”

Hussian College-Los Angeles indicated that while the school anticipates the employment rates to be above the benchmark in the 2023 Annual Report, the employment rates will likely fall below the benchmark rate in the 2022 Annual Report. The school identified that one additional placement in the Commercial Dance (BFA) program would move the program to a 71% employment rate and be above benchmark. In discussing the impact of the pandemic on the school’s student achievement rates, Hussian–Los Angeles noted that “[t]hroughout most of 2021, the industry continued to have higher than usual unemployment rates, although the rates steadily declined each month” (February 25, 2022 Hussian College-Los Angeles Response, p. 11). Although the Commission noted the impact of the pandemic on student achievement, it remains unclear at this time whether the school’s efforts are sufficient to support the success of these programs.

In addition, the Commission reviewed Hussian College-Los Angeles’s Outcomes Report and noted that several Descriptive Job Titles did not clearly indicate that the employment is directly related to the program from which the individual graduated and aligns with a majority of the educational and training objectives of the program. Specifically, it was unclear how the following graduates would be considered as placed in field:

| Graduate ID | Program                  | Start Date | Descriptive Job Title            |
|-------------|--------------------------|------------|----------------------------------|
| ██████      | Acting                   | 8/28/2017  | Social Media Marketing Assistant |
| ██████      | Acting                   | 8/28/2017  | Teacher/Admin                    |
| ██████      | Film and Digital Content | 8/27/2017  | Intake Assistant                 |

Of note, while the column states Descriptive Job Title and Responsibilities, the response only includes a job title. In light of the aforementioned questions related to the backup documentation and employment rate for these programs, the Commission determined that additional information and monitoring is warranted.

**Student Satisfaction:**

The June 7, 2021 Commission letter states that based on the Fall 2020 student satisfaction survey, students expressed dissatisfaction with the Library/LRS (34% dissatisfaction) and career services for employment after graduation (27% dissatisfaction). The March 15, 2022 On-site Evaluation Report from the virtual visit indicates student dissatisfaction with Academic Progress (23% dissatisfaction), Student Services (27% dissatisfaction), Training Equipment (25% dissatisfaction), and Distance Education (28% dissatisfaction).



Additionally, the March 15, 2022 On-site Evaluation Report indicates that 26% of Acting (BFA) students are dissatisfied with Financial Aid.

In response to the Student Satisfaction Report as included in the June 7, 2021 Commission letter and in response to the student satisfaction concerns as stated in the March 15, 2022 On-site Evaluation Report, Hussian College-Los Angeles stated that the school “conducts student satisfaction surveys twice per year – once in the Fall semester and once in the spring semester” and that the “most recent Student Satisfaction Survey was conducted in the Fall 2021 semester” while the “Spring semester survey is scheduled to be deployed in April 2022” (Hussian College-Los Angeles March 26, 2022 Response, p. 21, p. 56, p. 21). The Commission questioned the soundness of only gathering student survey feedback twice a year in the face of the level of expressed dissatisfaction. Although Hussian College-Los Angeles provided an analysis of the Fall 2021 survey that showed some improvement in some areas along with a discussion of the possible impacts of the pandemic on student satisfaction, given that levels of student dissatisfaction the Commission is interested in reviewing the Spring 2022 survey data, the school’s analysis, and any resultant action.

### **Refunds:**

As part of the March 15, 2022 On-site Evaluation Report, the evaluation team noted three refunds that were not made in a timely manner in accordance with the school’s published policy. In addition, the evaluation team noted that the school publishes inconsistent policies within the Cancellation and Refund section of the catalog. In response, Hussian–Los Angeles recognized “there was an inconsistency when the refund timing was last updated in its catalog and has since made the correction” (*Id.*, p. 28). The school clarified that the correct policy is that:

*...refunds to students will be issued within 45 days from the date the College determines a student’s last date of attendance, the date the College receives the Notice of Cancellation, or the date that a student fails to return from an approved leave of absence. (Id., p. 28)*

To demonstrate this policy update, the school provided copies of the updated current catalog and revised enrollment agreement confirming “the catalog and the enrollment agreement are aligned on this policy.” In addition, Hussian–Los Angeles “acknowledge[d] errors” for the three students listed identified in the OER “but is committed to ensuring proper administration of the policy.” While the school provided a list of steps “[t]o ensure we are tracking appropriately,” Hussian College-Los Angeles did not provide an analysis of what caused the previous errors, how the steps provided will ensure these errors are not repeated, or documentation to demonstrate implementation of the new tracking mechanisms (*Id.*, p. 28) As such, the Commission is interested in reviewing the school’s implementation of the new tracking mechanisms as a means to demonstrate refunds are made in a timely manner in accordance with the school’s published policy.

### **Program Capacity – UX Design (MS):**

In the March 15, 2022 On-site Evaluation Report, the evaluation team noted that the UX Design (MS) program, approved in February 2018, was not operational at the time of the evaluation. ACCSC’s *Rules of Process and Procedure* state that “where a program has not has any enrollments or graduates for two years, the Commission may, at its discretion, request additional supporting information from the school to determine whether it has maintained the capacity to offer the program” (*Section IV (E)(6)(f), Rules of Process and Procedure, Standards of Accreditation*). Therefore, the March 15, 2022 On-site Evaluation Report directed the school to submit information regarding the status of the program. In response, Hussian–Los Angeles stated that the school “initially planned to launch this program in 2020, however, the COVID-19 pandemic delayed the school’s planned launch” (*Id.*, p. 29). Hussian College-Los Angeles stated that the school still has the necessary capacity to deliver the program and provided information on equipment, facilities, faculty, curriculum, and the learning resource system. Given the overall concerns student

achievement as outlined hereto, the Commission is interested in an update on the status of the UX Design (MS) program, the school's first master's degree level program, and whether the school has launched the program and documentation to demonstrate the school's assertions that the school still has the necessary capacity to deliver the program.

**Hussian College-Clarksville, Tennessee (School#B072782)**

In response to the March 28, 2022 Corresponding Onsite Evaluation Report, Hussian College in Clarksville, Tennessee ("Hussian College-Clarksville") reported the following student achievement rates using a January 2022 Report Date on the Graduation and Employment Chart:

| <b>Program (Credential)</b>   | <b>Length in Months</b> | <b>Reported Graduation Rate</b> | <b>ACCSC Benchmark Graduation Rate</b> | <b>Reported Employment Rate</b> | <b>ACCSC Benchmark Employment Rate</b> |
|---|-------------------------|---------------------------------|--|---------------------------------|--|
| Medical Assisting-Clinical (AAS)*                                       | 18                      | 44%                             | 47%                                    | 69%                             | 70%                                    |
| Medical Assisting-Clinical (Diploma)                                    | 12                      | 39%                             | 55%                                    | 100%                            | 70%                                    |
| Network Support Administration-Engineer (AAS)*                          | 18                      | 27%                             | 47%                                    | 50%                             | 70%                                    |
| Pharmacy Technology (AAS)**   | 18                      | 40%                             | 47%                                    | 50%                             | 70%                                    |
| Billing and Coding Specialist-DE (Diploma)                              | 12                      | 18%                             | 55%                                    | 42%                             | 70%                                    |
| Billing and Coding Specialist-DE (AAS)*                                 | 18                      | 13%                             | 47%                                    | 50%                             | 70%                                    |
| Business Management-DE (BAS)  | 36                      | 17%                             | 40%                                    | 0%                              | 70%                                    |
| Business Management-DE (Diploma)  | 12                      | 17%                             | 55%                                    | 100%                            | 70%                                    |
| Business Management-DE (AAS)  | 18                      | 23%                             | 47%                                    | 75%                             | 70%                                    |
| Criminal Justice-DE (AAS)   | 18                      | 10%                             | 47%                                    | 50%                             | 70%                                    |
| Criminal Justice Administration-DE (BAS)                                | 36                      | 40%                             | 40%                                    | 13%                             | 70%                                    |
| Health Care Administration – Billing and Coding Specialist – DE (BAS)** | 36                      | 50%                             | 40%                                    | 0%                              | 70%                                    |
| Human Resources Management-DE (AAS)                                     | 18                      | 0%                              | 47%                                    | 0%                              | 70%                                    |
| Medical Assisting – Administrative-DE (Diploma)                         | 12                      | 23%                             | 55%                                    | 23%                             | 70%                                    |
| Medical Assisting – Administrative-DE (AAS)*                            | 18                      | 11%                             | 47%                                    | 17%                             | 70%                                    |
| Paralegal Studies-DE (AAS)  | 21                      | 0%                              | 43%                                    | 0%                              | 70%                                    |
| Pharmacy Technician-DE (AAS)**  | 18                      | 7%                              | 47%                                    | 25%                             | 70%                                    |
| Billing and Coding Specialist (AAS)*                                    | 18                      | 0%                              | 47%                                    | 0%                              | 70%                                    |
| Billing and Coding Specialist (Diploma)                                 | 12                      | 40%                             | 55%                                    | 50%                             | 70%                                    |
| Business Management (AAS)   | 18                      | 32%                             | 47%                                    | 67%                             | 70%                                    |
| Business Management (BAS)**   | 36                      | 23%                             | 40%                                    | 0%                              | 70%                                    |
| Criminal Justice (AAS)**  | 18                      | 6%                              | 47%                                    | 0%                              | 70%                                    |
| Criminal Justice Administration (BAS)**                                 | 36                      | 63%                             | 40%                                    | 10%                             | 70%                                    |



| Program (Credential)   | Length in Months | Reported Graduation Rate | ACCSC Benchmark Graduation Rate | Reported Employment Rate | ACCSC Benchmark Employment Rate |
|--|------------------|--------------------------|---------------------------------|--------------------------|---------------------------------|
| Health Care Administration-Billing and Coding Specialist (BAS)** | 36               | 50%                      | 40%                             | 0%                       | 70%                             |
| Human Resources Management (AAS)*                                | 18               | 42%                      | 47%                             | 20%                      | 70%                             |

This represents 25 of 26 reportable programs offered by Hussian College-Clarksville, Tennessee.

\*These programs are currently in Teach-Out or are discontinued.

\*\*These programs are currently under an institutional led cease enrollment.

The Commission found that Hussian College-Clarksville reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.

The school stated in the response that it has continued to implement the same strategies as presented in its July 2021 response to the Commission. These strategies include changes to Satisfactory Academic Progress (SAP) Policy, the realignment of term length and credit load per term, changes to re-entry practices, changes to entrance assessment and entrance assessment policy changes to delivery model for first-term students, and the student success department. The change to SAP policies lead to an 11% improvement in the number of students dismissed due to not meeting SAP (page 28 of the school’s response). The realignment of term length and credit load per term took place in May 2020 and the school noted the change has led to an improvement in student persistence from the first to second terms. The school noted the following improvements have occurred:

- The percentage of reentry students that withdraw again improved by decreasing from 87.04% to 50.1%;
- The percentage of reentry students that reentered and graduated improved from 6.6% to 9.8%; and
- The percentage of reentry students that were still enrolled at the time of data analysis improved from 6.3% to 39.2 % (page 29 of the school’s response).

Hussian College-Clarksville’s changes to the entrance assessment and the entrance assessment policy appear to have included transitioning to the Wonderlic SLE/SLE-Q assessment and implementing minimum required scores specific to each program.

In analyzing the impact of the delivery model, the school noted that around 60% of non-retained students were lost between the first term and the second term. Changes to the delivery model include the use of a synchronous course for 100% online students led to an 8% improvement in student persistence from the first term to the second. For campus-based students, an April 2021 initiative saw the school only use blended courses in the first term. Following implementation, the school noted a 5% improvement in retention from the first term to the second term. Beginning in June 2021, Hussian College started a new Student Success department to help design campus specific retention plans and provide student support and student services to increase retention and persistence through graduation.

Regarding the impact of the pandemic, the school noted the particular impact on graduation rates, as the school saw 56.4% of withdrawals from distance education students occur within the first six months of the pandemic (March 2020-September 2020). The school saw 11.9% of its withdrawals from non-distance education students occur during the time while campus was closed and all classes occurred online.

The Commission acknowledged the submitted teach outs and discontinuations for the following programs: Medical Assisting-Clinical(AAS), Network Support Administration – Engineer (AAS), Billing and Coding Specialist-DE (AAS), Medical Assisting – Administrative – DE (AAS), Billing and Coding Specialist (AAS), and Human Resources Management (AAS).



While the Commission noted the school’s improvement efforts and analysis as well as the institution-led Teach Out, discontinuation, and cease enrollments, the Commission found that the remaining programs reported below benchmark rates at times well below the Commission’s benchmarks.

**Daymar College-Columbus, Ohio (School#B072781)**

In response to the March 28, 2022 On-Site Evaluation Report, Daymar College in Columbus, Ohio (“Daymar College-Columbus”) reported the following student achievement rates using a January 2022 Report Date on the Graduation and Employment Charts:

| Program (Credential)                 | Length in Months | Reported Graduation Rate | ACCSC Benchmark Graduation Rate | Reported Employment Rate | ACCSC Benchmark Employment Rate |
|--------------------------------------|------------------|--------------------------|---------------------------------|--------------------------|---------------------------------|
| Billing and Coding Specialist (AS)*  | 18               | 50%                      | 47%                             | 100%                     | 70%                             |
| Medical Assisting-Clinical (AAS)*    | 18               | 33%                      | 47%                             | 0%                       | 70%                             |
| Medical Assisting-Clinical (Diploma) | 12               | 30%                      | 55%                             | 57%                      | 70%                             |
| Medical Massage Therapy (Diploma)    | 12               | 40%                      | 55%                             | 50%                      | 70%                             |

This represents 4 of 4 reportable programs offered by Daymar College-Columbus, Ohio.

\*These programs have been discontinued.

The Commission found that Daymar College-Columbus reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.

The school stated in the response that it has continued to implement the same strategies as presented in the July 21, 2021 response to the Commission. These strategies include realignment of the term length and credit load per term, decreasing the term length from 12 weeks to six weeks, as of May 2020. The school noted a “decrease of 45% in the number of failing grades students received” (Daymar College-Columbus April 4, 2022 Response, p. 19). Additionally, the school stated it made changes to reentry practices and implemented a new re-entry policy in July 2019, resulting in a more selective process leading to a higher retention of reentry students. The school noted the following improvements have occurred:

- The percentage of reentry students that withdraw again improved by decreasing from 87.04% to 50.1%;
- The percentage of reentry students that reentered and graduated improved from 6.6% to 9.8%; and
- The percentage of reentry students that were still enrolled at the time of data analysis improved from 6.3% to 39.2%.

Additionally, the school stated that it made changes to the entrance assessment and the entrance assessment policy; the school changed the entrance assessment to the Wonderlic SLE/SLE-Q assessment and implemented minimum required scores specific to each program. The school noted a 22% improvement in “persistence of students from their first term to their second term” (*Id.*, p. 21). Finally, the school stated it made changes to the delivery model for first-term students beginning in April 2021 and that the school only scheduled first-term students in campus-based courses because it felt online learning and blended courses were not meeting the student expectations.

The school also noted its belief that the pandemic impacted the January 2022 graduation and employment rates. On this topic, the school provided the following analysis:

*39.5% of the students that withdrew did so during the time the campus was delivering all courses 100% online due to the pandemic. Of these students, 46% of them were in the Medical Massage Therapy*



*program. 23.7% of the students that withdrew did so during the first six months of the pandemic. Additionally, these students were all in the Medical Massage Therapy and Medical Assisting Clinical programs (Id., p. 22).*

The school believes that due to the nature of these programs, the pandemic impacted the decision making of the students to withdraw from these programs.

Although the Commission noted Daymar College-Columbus' efforts to support student achievement, the Commission found that both the employment and graduation rates for the Medical Assisting-Clinical (Diploma), Medical Assisting-Clinical (AAS), Medical Massage Therapy (Diploma) programs remain significantly below ACCSC's benchmark rate.

Additionally, the Commission is in receipt of the Discontinued Programs notification submitted by Daymar – Columbus for the Medical Assisting – Clinical (AAS) and Billing and Coding Specialist (AS) programs.

**Daymar College-Murfreesboro, Tennessee (School#B072783)**

In response to March 28, 2022 Corresponding On-Site Evaluation Report, Daymar College in Murfreesboro, Tennessee ("Daymar College-Murfreesboro") reported the following student achievement rates using a January 2022 Report Date on the Graduation and Employment Charts:

| Program (Credential)                 | Length in Months | Reported Graduation Rate | ACCSC Benchmark Graduation Rate | Reported Employment Rate | ACCSC Benchmark Employment Rate |
|--------------------------------------|------------------|--------------------------|---------------------------------|--------------------------|---------------------------------|
| Medical Assisting-Clinical (Diploma) | 12               | 26%                      | 55%                             | 71%                      | 70%                             |
| Medical Assisting-Clinical (AAS)*    | 18               | 20%                      | 47%                             | 50%                      | 70%                             |
| Accounting (AAS)                     | 18               | 13%                      | 47%                             | 100%                     | 70%                             |
| Criminal Justice (AAS)*              | 18               | 9%                       | 47%                             | 100%                     | 70%                             |
| Billing and Coding Specialist (AAS)* | 18               | 33%                      | 47%                             | 80%                      | 70%                             |
| Pharmacy Technology (AAS)*           | 18               | 57%                      | 47%                             | 50%                      | 70%                             |

This represents 6 of 6 reportable programs offered by Daymar College-Murfreesboro, Tennessee.

\*These programs are currently in Teach-Out or are discontinued.

The Commission found that Daymar College-Murfreesboro reported the graduation and employment rates highlighted above that fall below ACCSC's student achievement benchmark rates.

The school stated in the response that it has continued to implement the same strategies as presented in the July 21, 2021 response to the Commission. These strategies include realignment of the term length and credit load per term, decreasing the term length from 12 weeks to six weeks, as of May 2020. The school noted a "19% improvement in the number of failing grades" (Daymar College-Murfreesboro April 4, 2022 Response, p. 28). Additionally, the school stated that it made changes to reentry practices and implemented a new re-entry policy in July 2019, resulting in a more selective process leading to a higher retention of reentry students. The school noted the following improvements have occurred:

- The percentage of reentry students that withdraw again improved by decreasing from 87.04% to 50.1%;
- The percentage of reentry students that reentered and graduated improved from 6.6% to 9.8%; and
- The percentage of reentry students that were still enrolled at the time of data analysis improved from 6.3% to 39.2%.



Additionally, the school stated that it made changes to the entrance assessment and the entrance assessment policy; the school changed the entrance assessment to the Wonderlic SLE/SLE-Q assessment and implemented minimum required scores specific to each program. The school noted a 53% improvement in “average persistence from first term to second term” (*Id.*, p. 30). Finally, the school stated it made changes to the delivery model for first-term students; beginning in April 2021, the school only scheduled first-term students in campus-based courses because it felt online learning and blended courses were not meeting the student expectations. The school also noted its belief that the pandemic impacted the January 2022 graduation and employment rates. The school provided the following analysis:

*11.1% of the students that withdrew did so during the time the campus was delivering all courses 100% online due to the pandemic. 30.2% of the students that withdrew did so during the first six months of the pandemic and 51.3% of them were students in the Medical Assisting – Clinical program. Given the hands-on, skill-based nature of the program, these results are not surprising, and the school believes that the pandemic impacted the decision making of the students that withdrew from that program (Id., p. 31)*

Additionally, in response to the Commission’s student satisfaction finding during the Corresponding On-Site Evaluation for 29% of students surveyed would not recommend the school to a friend, the school provided a Spring 2022 survey resulting in 23.53% students surveyed would not recommend the school to a friend. The school noted that the percentage during the Commission visit was based on a small sample size. The school stated, “historical surveys indicate a high level of satisfaction in regard to recommending the school to a friend. Based on these two factors, the school will continue to monitor the results of this specific question...” (*Id.*, p. 32). The school did not provide further explanation or a description of factors that may have impacted the student satisfaction results, or potential strategies to target these factors, and measures of the effectiveness of these strategies. The Commission found that there is an established trend to the high dissatisfaction in this particular area of student satisfaction and remains interested in monitoring the school’s student satisfaction results in this area.

Although the Commission noted Daymar College-Murfreesboro’ efforts to support student achievement, the Commission found that the employment and/or graduation rates for the Medical Assisting-Clinical (Diploma), Medical Assisting-Clinical (AAS), Accounting (AAS), Billing and Coding Specialist (AS), Criminal Justice (AAS), Pharmacy Technology (AAS) programs remain significantly below ACCSC’s benchmark rate.

In addition, the Commission is in receipt of the Discontinued Programs notification submitted by Daymar College-Murfreesboro for the Medical Assisting-Clinical (AAS), and the Teach-Outs for the and Billing and Coding Specialist (AS), Criminal Justice (AAS), and Pharmacy Technology (AAS) programs.

#### **Daymar College-Nashville, Tennessee (School#B072784)**

In response to the March 28, 2022 On-Site Evaluation Report, Daymar College, located in Nashville, Tennessee (“Daymar College-Nashville”) reported the following student achievement rates using a January 2022 Report Date on the Graduation and Employment Chart:

| <b>Program (Credential)</b>             | <b>Length in Months</b> | <b>Reported Graduation Rate</b> | <b>ACCSC Benchmark Graduation Rate</b> | <b>Reported Employment Rate</b> | <b>ACCSC Benchmark Employment Rate</b> |
|---|-------------------------|---------------------------------|--|---------------------------------|--|
| Billing and Coding Specialist (AAS)*    | 18                      | 40%                             | 47%                                    | 100%                            | 70%                                    |
| Billing and Coding Specialist (Diploma) | 12                      | 33%                             | 55%                                    | 50%                             | 70%                                    |
| Business Management (AAS)*              | 18                      | 20%                             | 47%                                    | 67%                             | 70%                                    |



| Program (Credential)                 | Length in Months | Reported Graduation Rate | ACCSC Benchmark Graduation Rate | Reported Employment Rate | ACCSC Benchmark Employment Rate |
|--------------------------------------|------------------|--------------------------|---------------------------------|--------------------------|---------------------------------|
| Business Management (BAS)*           | 36               | 0%                       | 40%                             | 0%                       | 70%                             |
| Medical Assisting-Clinical (AAS)*    | 18               | 53%                      | 47%                             | 57%                      | 70%                             |
| Medical Assisting-Clinical (Diploma) | 12               | 48%                      | 55%                             | 70%                      | 70%                             |

This represents 6 of 6 reportable programs offered by Daymar College-Nashville, Tennessee.

\*These programs are currently in Teach-Out or are discontinued.

The Commission found that Daymar College-Nashville reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.

The school stated in its response that it has continued to implement the same strategies as presented in its July 2021 response to the Commission. These strategies include the realignment of term length and credit load per term, changes to re-entry practices, changes to entrance assessment and entrance assessment policy, and changes to delivery model for first-term students. The realignment of term length and credit load per term took place in May 2020 and the school noted the change has led to a “7% improvement in the number of failing grades” (Daymar College-Nashville April 4, 2022 Response, p. 21). Regarding changes to re-entry practices, the school noted the following improvements have occurred:

- The percentage of reentry students that withdraw again improved by decreasing from 87.04% to 50.1%;
- The percentage of reentry students that reentered and graduated improved from 6.6% to 9.8%; and
- The percentage of reentry students still enrolled at the time of data analysis improved from 6.3% to 39.2%.

Daymar College-Nashville’s changes to the entrance assessment and the entrance assessment policy included transitioning to the Wonderlic SLE/SLE-Q assessment and implementing minimum required scores specific to each program. The school made April 2021 changes to its delivery model after finding that most students were withdrawing during their first term or after completing the first term. The school began only scheduling first-term students for blended courses as opposed to online courses and noted that average persistence from first term to second term rose from 33% to 50% after making the change.

Regarding the impact of the pandemic, the school noted a particular effect on its graduation rate, with 19.5% of student withdraws reported in the above January 2022 report dates coming during the time all programs were being taught 100% online. Overall, 14.62% of withdrawn students did so during the first six months of the pandemic.

The Commission acknowledged the submitted teach outs and discontinuations for the following programs: Billing and Coding Specialist (AAS), Business Management (AAS), Business Management (BAS), Medical Assisting-Clinical (AAS).

While the Commission noted the school’s improvement efforts and analysis as well as the institution-led Teach Outs, discontinuations, and cease enrollments, the Commission found that the remaining programs reported below benchmark rates.

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Based on the foregoing and given the scope of outcomes findings and lack of programmatic attention and planning in response to those outcomes, the Commission noted a strong concern across the ACCSC accredited Hussian College and Daymar College campuses. Therefore, the Commission determined that a



system-wide review of these issues is merited and voted to place the system ACCSC-accredited Hussian College System of Schools on Warning. In this system-wide review, the Commission seeks additional information in a broader sense and scope as a means to assess system's, campuses', and programs' ability to address and improve the noted student achievement outcomes.

Accordingly, the Commission directs the Hussian College System of Schools to submit the following:

- a. An analysis of student achievement outcomes that explains the breadth of student achievement outcomes issues across the entire Hussian College System of Schools, as well as the history of reporting below-benchmark rates of student achievement. The analysis should identify the issues that are system-wide and those factors that are unique to each school and to each program;
- b. An analysis of the impact of the pandemic on the Hussian College System of Schools' reported graduation and employment rates;
- c. An explanation as to how the Hussian College System of Schools is addressing the factors identified in (a) and (b) along with any individual campus and programmatic plans, as applicable; and
- d. An analysis of the efficacy of the Hussian College System of School's new initiatives to improve student achievement rates.

The Commission also directs **each** Hussian College and Daymar College campus included in this letter to submit the following:

- a. A Graduation and Employment Chart for each program included in this letter and noted above using a **July 2022 Report Date**;
- b. 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 field<sup>4</sup> (line #14), provide the following information:

| Count | Graduate ID | Program | Start Date | Grad. Date | Employer, Contact, Address, & Ph. # | Date of Initial Employment | Descriptive Job Title and Responsibilities | Source of Verification <sup>5</sup> (Graduate or Employer) |
|-------|-------------|---------|------------|------------|-------------------------------------|----------------------------|--|--|
| 1     |             |         |            |            |                                     |                            |  |  |

<sup>4</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

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

- 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:

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

- c. For each active (non-discontinued) program for which the Graduation and Employment Chart submitted in item (b.) above that reports a below-benchmark rate of student graduation and/or graduate employment, provide the following:

- i. A description of the specific local issues impacting student achievement in that program;
- ii. A description of the campus-level initiatives in place to improve student achievement outcomes and an analysis of the efficacy of those efforts;
- iii. An analysis as to when the school projects the graduation and/or employment rate(s) to meet ACCSC’s established benchmark rate(s);
- iv. For each program that reports an employment rate under 50%, include internal and external validation of the program content and objectives as well as an analysis of the job opportunities for the school’s graduates; and
- v. Contemporaneous information in the form of retention and employment data, as follows:
  - For programs that report a below-benchmark graduation rate, provide an **ACCSC Retention Chart** using a **July 2022 Report Date** (available on the Commission’s website) and
  - For programs that report a below benchmark rate of graduate employment, provide employment information for all graduates from the program from the last six months in the following format:

| Count | Graduate ID | Program | Start Date | Grad. Date | Employer, Contact, Address, & Ph. # | Date of Initial Employment | Descriptive Job Title and Responsibilities | Other Status (Unemployed, Further Ed., Unknown, Etc.) |
|-------|-------------|---------|------------|------------|-------------------------------------|----------------------------|--|---|
| 1     |             |         |            |            |                                     |                            |  |   |

and

- d. For all programs for which the campus has submitted a Teach-Out Plan Approval Form, submit the following:



- i. An update on all students listed in the Programmatic Teach Out Plan Approval Forms as follows:

| Student ID | Campus | Program | Graduation Date | Withdrawal/Termination Date | If Active, Expected Graduation Date |
|------------|--------|---------|-----------------|-----------------------------|-------------------------------------|
|            |        |         |                 |                             |                                     |

and

- ii. For each graduate from the chart above that obtained training-related employment, provide the following information:

| Count | Graduate ID | Program | Start Date | Grad. Date | Employer, Contact, Address, & Ph. # | Date of Initial Employment | Descriptive Job Title and Responsibilities | Source of Verification <sup>6</sup> (Graduate or Employer) |
|-------|-------------|---------|------------|------------|-------------------------------------|----------------------------|--|--|
| 1     |             |         |            |            |                                     |                            |  |  |

Hussian College-Los Angeles must submit the following:

Student Satisfaction:

- A summary of the April 2022 semester survey results with aggregate and programmatic data;
- Analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction;
- Minutes of a meeting of the Program Advisory Committee that are held at the school specifically to review and comment on the equipment, if applicable;
- A description of the school’s mechanisms for remaining attentive to student needs along with an explanation as to how the strategies implemented by the school are intended to target those factors;
- Documentation to demonstrate efforts implemented to address any areas of student dissatisfaction (if applicable); and
- Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

Refunds:

- A copy of the school’s refund policy as published in the catalog and enrollment agreement,
- A list of the 10 most recently withdrawn students who were owed a refund, organized as below:

| Student ID# | Start Date | Last Date of Attendance | Date of Determination | Due Date | Date Refund Paid | Refund Amount |
|-------------|------------|-------------------------|-----------------------|----------|------------------|---------------|
|             |            |                         |                       |          |                  |               |

- An ACCSC Refund Report for the 10 most recently withdrawn students as listed above to include the enclosed the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records to include documentation of approved leave of absences (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds;
- Student ledgers for each of the students noted above, demonstrating tuition charges applied, tuition funds paid, and refunds issued;

<sup>6</sup> Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

- e. An explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school's refund policy; and
- f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

Program Capacity – UX Design (MS):

- a. The program 2022 start date or an anticipated start date, if applicable;
- b. If the program has not yet started, a description of the school's plans and any steps the school needs to complete prior to launch, as applicable; and
- c. Any additional information that the school believes will assist the Commission in determining the school's compliance

Daymar College-Murfreesboro must submit the following:

- a. The most recent student satisfaction survey results for the students surveyed that *would not recommend the school to a friend*;
- b. A description of the school's mechanisms for remaining attentive to student needs;
- c. An assessment of the factors impacting the rate of student satisfaction for the above noted measure;
- d. An explanation as to how the strategies implemented by the school are intended to target those factors;
- e. A description of how the school is measuring the effectiveness of those strategies;
  - i. A description of the student survey process and a copy of the survey instrument;
  - ii. A detailed narrative of the school's plans to address an areas of student satisfaction, if applicable, and any other information to support the efforts made to enhance a student's experience at the school; and
- f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

**Response Requirements:**

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

The system of ACCSC accredited Hussian College System of Schools must provide a response to this reporting requirement that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.<sup>7</sup> If the response contains documentation that includes personal or confidential student or staff information that is not

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<sup>7</sup> ACCSC has issued two modules of the **Blueprints for Success Series**: [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules prior to formulating its response to this letter. More information is available under the [Resources section](#) at [www.accsc.org](http://www.accsc.org).



required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

The system of ACCSC accredited Hussian College System of Schools campuses must upload the electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The schools will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The response to this letter must include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before September 8, 2022** along with a **\$3,000 Warning Processing Fee**. If a response, the required fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before September 8, 2022**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED].

Sincerely,

[REDACTED]  
Michale S. McComis, Ed.D.  
Executive Director

Encl.: Appendix I  
Appendix II  
ACCSC Refund Report Summary Sheet  
ACCSC Refund Report Worksheet

**APPENDIX I**  
**ACCREDITATION ACTIONS CONSIDERED**

| School  | Accreditation Action Considered   |
|---|---|
| Daymar College (#B072783)<br>Murfreesboro, Tennessee  | Renewal of Accreditation (COSE)   |
| Daymar College (#B072781)<br>Columbus, Ohio           | Renewal of Accreditation (COSE)   |
| Daymar College (#B072784)<br>Nashville, Tennessee     | Renewal of Accreditation (COSE)   |
| Hussian College (#B072782)<br>Clarksville, Tennessee  | Renewal of Accreditation (COSE)   |
| Hussian College (#B072486)<br>Los Angeles, California | Renewal of Accreditation / Initial Distance Education<br>(Virtual Visit) & Outcomes Report / Student<br>Satisfaction Report |

Additional Hussian College campuses included in the System-Wide Warning include:

| School   |
|--|
| Hussian College (#M000404)<br>Philadelphia, Pennsylvania |



**APPENDIX II**  
**Hussian College (School #M000404)**

| <b>Program<br/>(Credential)</b>       | <b>Length in<br/>Months</b> | <b>Reported<br/>Graduation<br/>Rate*</b> | <b>ACCSC<br/>Benchmark<br/>Graduation<br/>Rate</b> | <b>Reported<br/>Employment<br/>Rate*</b> | <b>ACCSC<br/>Benchmark<br/>Employment Rate</b> |
|---------------------------------------|-----------------------------|--|--|--|--|
| Art (BFA)                             | 32                          | 31%                                      | 40%  | 75%                                      | 70%  |
| Enhanced Front End Web<br>Development | 32                          | 52%                                      | 40%  | 23%                                      | 70%  |

\*Rates from 2021 ACCSC Annual Report with a July 2021 report date

**ACCSC REFUND REPORT SUMMARY SHEET**

School Name:

School Number:

Refund Report Date Range:

| Student Name | Start Date | Last Date of Attendance | Date of Determination of Withdrawal / Termination | Refund Due Date | Date Refund Paid* |
|--------------|------------|-------------------------|---|-----------------|-------------------|
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |
|              |            |                         |   |                 |                   |

\*This is the date that the refund was distributed to or received by either the student or applicable funding source.



## REFUND REPORT WORKSHEET

*A separate worksheet must be completed for each refund made within the time period specified by the Commission.*

Name of Student: \_\_\_\_\_ Date of Enrollment: \_\_\_\_\_

|  |  |
|--|--|
| The maximum number of days for which the school must disburse refunds, as defined in the school's refund policy:   |  |
| Based upon the school's refund policy, select (a) or (b) below and enter the date the school used to calculate the number of days required to disburse the refund: |  |
| <b>(a) Last date of attendance</b>   |  |
| <b>(b) Date of determination of termination/withdrawal</b>   |  |
| Date of refund disbursement:   |  |
| The actual number of days between (a) or (b) above and the date the school disbursed the refund:   |  |

Attach to this worksheet a detailed explanation for why the refund was late (if applicable).

|   |    |
|---|----|
| <b>Length of program or period of enrollment:</b>               |    |
| <b>Percentage of program or period of enrollment completed:</b> | %  |
| <b>Total tuition for program or period of enrollment:</b>       | \$ |
| total amount of tuition collected:                              | \$ |
| percentage of total tuition collected:                          | %  |
| percentage of collected tuition retained (c):                   | %  |
| percentage of collected tuition refunded (d):                   | %  |
| <b>Amount of refund</b>   | \$ |

Attach to the school's submission:

- One copy of the school's withdrawal/refund policy and attendance policy, as it appears in the school's catalog, must accompany the school's submission. If the school uses one or more state refund policies, please attach a copy of each state's refund policy. One copy per state will suffice for the entire Refund Report.
- The Refund Report Summary Sheet for all refunds included in this report.

Attach to this worksheet:

- Copy of the calculation sheet(s) showing how the refund was calculated,
- Copy of the front and the back of the refund check(s) or electronic transmission document(s).

## THE REFUND REPORT WORKSHEET GLOSSARY

**Name of student:** As it appears on the signed Enrollment Agreement.

**Date of enrollment:** The date the Enrollment Agreement was signed.

**Last date of attendance (a):** The last day the student attended class.

**Date of determination of termination/withdrawal (b):** The date the student's enrollment was terminated either by voluntarily withdrawal or by termination by the school.

**Date of refund disbursement:** The date the refund check was processed and disbursed or electronically transmitted (Pell accounts).

**Length of program or period of enrollment:** The total length of the program, or period of enrollment for which tuition is charged, measured in either weeks, months, or clock hours, whichever is most appropriate for refund calculation purposes.

**Percentage of program or period of enrollment completed:** Length of the total program, or period of enrollment for which tuition is charged, completed divided by the amount of the length of the program or period of enrollment for which tuition is charged uncompleted.

**Total tuition for program or period of enrollment for which tuition is charged:** The total tuition cost for the program, or period of enrollment for which tuition is charged. This amount does not include application fees, books, supplies, uniforms, etc., unless those items are completely refundable by the school.

**Total amount of tuition collected:** The amount of refundable monies collected.

**Percentage of total tuition collected:** The percentage of refundable monies collected.

**Percentage of collected tuition retained (c):** The percentage of refundable monies collected that was retained by the school for training received by the student.

**Percentage of collected tuition refunded (d):** The percentage of refundable monies collected that was returned to the student, or to financial aid accounts on behalf of the student, for training which was purchased but not received by the student. Items (c) and (d) should total 100%.

**Amount of refund:** The dollar and cents amount of the refund.