



Accrediting Commission of Career Schools and Colleges

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ELECTRONIC DELIVERY

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Joseph Bierbaum
President
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84 Iranistan Ave.
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School #M000242
Warning

Dear Mr. Bierbaum:

The Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) has considered its previous decision to continue Paier College, located in Bridgeport, Connecticut, on Warning including the following:

- The ACCSC December 13, 2023 letter;
- Paier College’s February 5, 2024 Response;
- Paier College’s February 6, 2024 Response Addendum;
- ACCSC’s March 11, 2023 On-Site Evaluation Report (“OER”);
- Paier College’s Revised Response to the OER submitted to ACCSC on April 25, 2023; and
- Paier College’s February 6, 2024 Additional Information containing documentation of a Class Action Complaint against Connecticut-based regulatory bodies (“Class Action Complaint”).

Upon review of the December 13, 2023 Commission letter and the school’s responses, the Commission voted to continue Paier College on **Warning** with a subsequent review scheduled for ACCSC’s **August 2024** meeting. The Commission additionally voted to release its review and ongoing concerns regarding the March 11, 2023 OER and the school’s response. These items are contained within this letter under Section IV.

Additionally, the Commission’s consideration and review included an anonymous complaint received on August 21, 2023 and the school’s response to that complaint. The Commission voted to accept Paier College’s response and now considers the anonymous complaint closed. However, pursuant to *Section VI (A)(5)(c), Rules of Process and Procedure, Standards of Accreditation*, the issues subject to a complaint that the Commission has closed will not be subject to further review or consideration unless subsequent complaints against the school raise new issues or suggest a pattern of significant noncompliance with accrediting standards not evident from the Commission’s initial review.

I. Management and Administrative Capacity

May 2023 Review¹

At its May 2023 meeting, the Commission directed Paier College to demonstrate that all owners,² members of school management, and administrative employees have past records that demonstrate a commitment to: a) providing quality education to students; b) ethical, fair, and honest practice; and c) compliance with accrediting standards and applicable federal, state, and local requirements pursuant to *Section I (A)(2), Substantive Standards, Standards of Accreditation*. This standard also establishes that the Commission will

¹The full details of the Commission’s May 2023 review are contained within the Commission’s August 7, 2023 letter.

²*Section I (A)(2), Substantive Standards, Standards of Accreditation* specifically states, “all owners” and therefore is not limited to majority owners and as such the Commission requires that any owner must meet the expectation and requirements set forth therein.

consider an individual's affiliation with a school that has lost or been denied accreditation, entered into bankruptcy, or closed.

The Commission determined to learn more about the decision to precipitously close the Stone Academy campuses without an executable teach-out plan or agreement and Stone Academy's failure to fulfill its obligations to its students. A failure to demonstrate a commitment to a) providing quality education to students; b) ethical, fair, and honest practice; and c) compliance with accrediting standards and applicable federal, state, and local requirements would potentially render an owner ineligible to maintain ownership of an ACCSC-accredited school.

September 2023 Review³

As stated in the Commission's December 13, 2023 letter, accrediting standards require that a school must demonstrate that all owners,⁴ members of school management, and administrative employees have past records that demonstrate a commitment to: (i) providing quality education to students; (ii) ethical, fair, and honest practice; and (iii) compliance with accrediting standards and applicable federal, state, and local requirements pursuant to *Section I (A)(2), Substantive Standards, Standards of Accreditation*.

Paier College disagreed with the Commission's assessment that "Stone Academy campuses made a decision to close precipitously" (August 7, 2023 Commission Letter, pg. 3), stating that "it was not the decision of Stone Academy to close precipitously" (September 7, 2023 Paier College Response, pg. 2). Paier College contends that Stone Academy and Mr. Bierbaum were prepared to afford its students a teach-out either internally or externally and offered such to the U.S. Department of Education, Connecticut Office of Higher Education, a potential teach out partner, and the Connecticut Attorney General's ("CT-AG") Office during calls that occurred on February 9, 2023 and February 10, 2023. Paier College stated that following the February 10, 2023 call, "the Attorney General's Office reached out to Stone's counsel and instructed Mr. Bierbaum to notify our students that Stone would be closing by no later than February 24th" (*Id.*, pg. 5). Paier College asserts that Stone Academy has continued to provide records to former students, that the state of Connecticut has stopped responding to student requests, and that the state of Connecticut was utilizing a teach-out partner originally proposed by Stone Academy and rejected by Connecticut. The school provided the requested attestations regarding owners' understanding of the Commission's requirements in the area of notifications and the provision of sufficient resources in the event of a decision to cease operations.

The Commission recognized Paier College's contention that Stone Academy did not make the decision to close precipitously. However, given the lack of documentation to support the claim that Stone Academy was forced to close without regard to proper protocol or regulation, the Commission required any available documentation including the teach-out information proffered to the state of Connecticut that may help to support that contention and provide a factual background as to the closure of Stone Academy. This point of contention notwithstanding, that the state of Connecticut would take such a drastic action to cause the immediate shut-down of a school speaks to the level of concern by state and the perceived need to protect students from improper conduct. The Commission also noted that while Mr. Bierbaum may not have had a controlling interest in or day-to-day control over Stone Academy, the school noted that Mr. Bierbaum "was privy to many of the strategic and operational decisions" and that "at times his opinions were solicited beyond October 2021" (*Id.*, pg. 2).

³ The full details of the Commission's September 2023 review are contained within the Commission's December 13, 2023 letter.

⁴ *Section I (A)(2), Substantive Standards, Standards of Accreditation* specifically states, "all owners" and therefore is not limited to majority owners and as such the Commission requires that any owner must meet the expectation and requirements set forth therein.

In response to both the precipitous closure of Stone Academy and the CT-AG’s Complaint against Stone Academy, Paier College, and Mr. Bierbaum, Paier College referenced that the school has undertaken court proceedings to dispute the actions and allegations of the state of Connecticut. While these proceedings are ongoing, they constitute circumstances that require the Commission’s heightened scrutiny. The Commission acknowledged the legal protections afforded to documentation used in court and in privileged communications and stated that any available documentation to support Paier College’s assertions would strengthen the school’s response.

II. Compliance with State and Federal Requirements

Connecticut Attorney General Complaint

Subsequent to the Commission’s May 2023 meeting, the Commission was notified of the CT-AG’s July 13, 2023 Complaint (“the Complaint”) against Stone Academy, Joseph Bierbaum, and Paier College. The Complaint specifically names Joseph Bierbaum and Paier College and details allegations that raise questions regarding Paier College’s compliance with accrediting standards. Pursuant to *Section VII (D)(5)(a)(iv), Rules of Process and Procedure, Standards of Accreditation*, the Commission reviews and takes appropriate action under ACCSC’s *Rules* regarding the accreditation status of any school for which the Commission has received information that a school is subject to an investigation or legal action by a state agency with regard to a school’s adherence to state law or regulation.

These items in the CT-AG’s Complaint also contain allegations regarding operations at Stone Academy that raise questions as to Mr. Bierbaum’s past record and commitment a) to providing quality education and b) ethical, fair, and honest practice (*Section I (A)(2)(a-b), Substantive Standards, Standards of Accreditation*). Specifically, the CT-AG’s allegations appear to include the hiring of unqualified faculty members under Connecticut law and the decision to stop taking attendance resulting in unverifiable clinical hours which rendered students ineligible for licensure.

The complaint also asserts that Paier College is liable for damages which raises questions regarding the ongoing financial soundness of the school and whether the school has resources sufficient for the proper operation of the school and the discharge of obligations to its students in light of the potential assignment of damages (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). Accordingly, ACCSC is interested in internally prepared financial documentation to demonstrate the financial structure and sufficient resources for the proper operation of the school.

The CT-AG Complaint contains further allegations regarding unfair and deceptive practices pursuant to Mr. Bierbaum and Paier College’s aiding and abetting of those practices.

In regard to the CT-AG Complaint against Stone Academy, Paier College, and Joseph Bierbaum, Paier College disputes the complaint’s allegations and alleges that the state is incorrectly citing regulations in several areas including marketing, funding, qualified staffing, and attendance. Similarly, Mr. Bierbaum disputes the claims against him again stating that he had no day-to-day control over Stone Academy after October 1, 2021 and that Stone Academy received independent approvals after that date.

United States Department of Education Heightened Cash Monitoring 2 (“HCM2”) Notice

The July 17, 2023 notice from the Department to Paier College indicates that the Department has transferred Paier College from the Advance method of payment to the HCM2 method of payment effective July 17, 2023. The Department took this action because of the recent lawsuit filed by the CT-AG against Stone Academy, Paier College, and common owner, Joseph Bierbaum. The action taken by the Department to

restrict the disbursement of financial aid through the HCM2 system of payment raises concerns regarding the school's ability to operate in accordance with accreditation standards and capacity to meet educational obligations to students.

Accordingly, Paier College must demonstrate compliance with federal government requirements (*Section I (D)(3), Rules of Process and Procedures, Standards of Accreditation*) and demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). Paier College stated that over half of the school's revenue is from non-Title IV sources and that the school adjusted its cash flow in order to account for the delay in funding from Title IV. Paier College's Director of Financial Aid has been working with the Department to compile the required HCM2 information.

III. Anonymous Complaint

At the September 2023 meeting, the Commission considered a complaint regarding Paier College. Upon review of this matter, the Commission voted to process this complaint in accordance with *Section VI, Rules of Process and Procedure, Standards of Accreditation*. The complaint alleges that Paier College may not be in compliance with the Commission's standard which requires schools to maintain compliance with all applicable federal requirements (*Section I (G)(2)(e), Rules of Process and Procedure, Standards of Accreditation*). Additionally, the complaint raises allegations outside of ACCSC's scope including Paier College's compliance with 90/10 regulations and the potential illicit transfer of funds between a C-Corp, Non-Profit, and Stone Academy⁵.

February 2024 Meeting

The Commission's December 13, 2023 letter requests information regarding Stone Academy's closure and Teach Out plans offered to the state of Connecticut; updates regarding court proceedings and the CT-AG complaint against Stone Academy, Paier College, and Joseph Bierbaum; an update as to the school's HCM2 and overall financial status; and the school's response to the anonymous complaint.

As previously stated in the Commission's December 13, 2023 letter, the CT-AG Complaint details allegations that raise questions regarding Mr. Bierbaum's past record and commitment to a.) providing quality education and to b.) ethical, fair, and honest practice (*Section I (A)(2)(a-b), Substantive Standards, Standards of Accreditation*). Accrediting standards also require Mr. Bierbaum's record to show compliance with applicable state and local requirements (*Section I (A)(2)(c), Substantive Standards, Standards of Accreditation*). Paier College's February 5, 2024 response provides communications from the Connecticut Office of Higher Education, Connecticut Department of Public Health, another school, and the CT-AG garnered from "the discovery phase of Stone's legal proceedings, multiple Freedom of Information Act requests, internal communications, and investigatory articles that have been written in the interim" (February 5, 2024 Paier College Response, pg. 8). Paier College contends that these communications show that Stone Academy intended to undergo a formal and approved teach out and that the state of Connecticut prevented such a teach out from occurring. Paier College also provided a May 12, 2023 communication between Stone Academy and the Connecticut Deputy Associate Attorney General which contains a teach out submitted to the state of Connecticut. The teach out contains Stone Academy's consideration of clinical, coursework, outcomes, curriculum, remediation, intake, and other items as part of a proposed teach out. The teach out does not, however, identify the proposed teach out partner out of concern for potential

⁵ The Commission previously copied the United States Department of Education on its December 13, 2024 letter in accordance with *Sections X (C)(6), Rules of Process and Procedures, Standards of Accreditation* and *Section VI (A)(4)(c), Rules of Process and Procedure, Standards of Accreditation*.

targeting by Connecticut regulatory bodies. Paier College additionally provided documentation of a legal filing by former Stone Academy students against the State of Connecticut and a media story critical of the State of Connecticut's handling of Stone Academy's closure and audit of the school's nursing student's files. The legal filing contends, among other items, that "Defendants [Timothy Larson, Sean Seepersad, Manisha Juthani, and Chris Andresen] undertook an unauthorized auditing process of the transcripts of Stone Academy students who had been enrolled on or after November 1, 2021," retroactively denied credits, and withheld nursing licenses (Class Action Complaint, pgs. 2-3). Paier College's response notes that court proceedings regarding Stone Academy's precipitous closure and involving Paier College is in pre-judgement phase and the CT-AG Complaint is in discovery phase.

The Commission acknowledged Paier College's submitted documents including the proposed teach out sent to the state of Connecticut which does not identify the proposed school. Additionally, the Commission noted that the cases against Stone Academy, Paier College, and Mr. Bierbaum are ongoing. As these cases are ongoing, the school must be able to demonstrate unequivocally that Paier College has the necessary and proper management and administrative capacity including individuals – administrators and owners alike – who possess past records demonstrating a commitment to providing quality education and ethical, fair, and honest practice.

Paier College must also demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). Paier College noted that the school's first HCM2 claim was received (and that the school expected an additional payout) and provided the Department's letter to that effect along with the school's December 8, 2023 notification to the Department of the school's voluntary withdrawal from Title IV as of December 31, 2023. The Department acknowledged Paier College's notification in a December 18, 2023 letter which requests information from the school and reminds the school of several requirements. Paier College asserted that there were "numerous" reasons for withdrawal from Title IV including regulatory burden and that the school had taken "into account our current student body as well as our target demographic" (February 5, 2024 Paier College Response, pg. 60). The school additionally stated that scholarship fundraising and alternative lending pathways would offset the Pell Grants no longer available to students and that the school aimed to increase revenue from non-Title IV sources. Paier College submitted interim financial statements for the period of July 1, 2023 through November 30, 2023 which recorded a net loss of \$83,342.11. Paier College stated that the school had received 1,465 applications in 2024 as of the date of the school's response and that this was more applications than any other previous year. Paier College's Management and Discussion Analysis notes the importance of maintaining quality in the face of increased enrollments including limiting enrollments. The school plans to increase its student population to 500 students by the end of the next fiscal year. The school additionally noted changes toward graduate programs and international recruitment as opportunities and initiatives.

The Commission acknowledged Paier College's plans for continued and sustainable revenue in the face of HCM2 and the school's withdrawal from Title IV and is interested in the efficacy of those plans and the current status of the school's financial situation. Additionally, The Commission concurs with Paier College's assessment that educational quality must be maintained in the face of increased enrollments and is interested in updates as to the school's enrollment and its sustaining of the school's educational quality.

In regard to the anonymous complaint processed by the Commission, Paier College noted Stone Academy and Paier College's long time Title IV compliance as confirmed in regular audits and that the second photo of the complaint documented Stone Academy's participation in Connecticut's Neighborhood Assistance Act tax credit program. Paier College additionally asserted that the allegations regarding cryptocurrencies

were baseless and provided an attestation that the school is in compliance with 90/10 regulations and laws and regulations regarding the transfer of funds between business entities. The Commission voted to accept Paier College’s response regarding this complaint and to close the complaint.

As additional information, Paier College provided an attestation from Gary A. Evans stating that Mr. Evans was CEO of Stone Academy from October 1, 2021 until January 4, 2022 and that “[d]uring this time, Joseph Bierbaum’s fulltime, primary, and daily responsibilities were at Paier College in Bridgeport, Connecticut” (*Id.*, pg. 68).

While the Commission acknowledged Paier College’s response, the past record and fitness of Mr. Bierbaum and therefore Paier College’s compliance with accrediting standards is informed by the results of ongoing court cases. The changes to Paier College’s finances given a decision to withdraw from Title IV create an ongoing need to evaluate the school’s finances.

Subsequent to February 2024 Meeting

Subsequent to the Commission’s February 2024 meeting, ACCSC became aware of a March 4, 2024 Press Release⁶ from the CT AG. The Commission will review and may take appropriate action as allowed under its *Rules* when it is aware of publicly available information (e.g., media, advertising, etc.) that appears to show or allege non-compliance with accreditation standards (*Section VII (D)(2), Rules of Process and Procedure, Standards of Accreditation*).⁷ This press release states that “the State has secured a \$5 million prejudgment remedy against Stone Academy” and contains the Order Regarding: 07/13/2023 101.00 Notice of Application for Prejudgment Remedy / Hearing (JD-CV-53⁸ (“the Order”)) (March 4, 2024 CT AG Press Release). The Order states that the court is required to take any defenses or counterclaims in its determination and that Mr. Bierbaum’s testimony “did nothing to change the court’s initial impression” (the Order, pg. 1). The Order names Stone Academy and Mr. Bierbaum (“PJR defendants”) as having “materially misrepresented to consumers significant aspects of Stone Academy’s practical nursing program (*Id.*, pg. 2). The Order additionally notes that “[t]he court previously found that the State acted reasonably in refusing to allow Stone Academy to offer a teach-out, and the evidence does not excuse the misconduct of the PJR defendants, or their violations of CUTPA [Connecticut Unfair Trade Practices Act]” (*Id.*, pg. 2). As such, the Order appears to verify Paier College’s contention that Stone Academy attempted to teach out its students, but vindicates the state’s decision to not accept the provided teach out. In doing so, it appears to reference a previous decision not known to ACCSC which is relevant to the Commission’s deliberations. Paier College has the burden to supply the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards—including the school’s compliance with state and federal laws and regulations when investigations are instigated or findings are made (*Introduction, Substantive Standards, Standards of Accreditation*). That such information may not be flattering to a school is by no means a reason or excuse not to provide it to ACCSC.

Additionally, and significantly, the Order appears to document Mr. Bierbaum’s noncompliance with state laws and regulations as required under *Section I (A)(2)(c), Substantive Standards, Standards of Accreditation*:

[t]he actions of the PJR defendants constituted unfair and deceptive acts and practices in violation of §42-110b(a), and said defendants acted knowingly, in violation of §42-110b, such that there is

⁶ <https://portal.ct.gov/ag/press-releases/2024-press-releases/attorney-general-tong-secures-prejudgment-remedy-in-case-against-stone-academy>

⁷ As promulgated in the [January 2, 2024 Accreditation Alert](#).

⁸ https://portal.ct.gov/-/media/ag/press_releases/2024/prj-ruling-states-case.pdf

probable cause that the plaintiff will prevail with respect to the civil penalty provision of \$5,000.00 per violation, pursuant to §42-110o(b) (Id., pg. 2).

The Order raises serious questions as to Mr. Bierbaum’s past record of compliance with state laws and regulations regarding CUTPA and Stone Academy’s obligation to provide an acceptable teach out to the state. These questions are serious and call into question the propriety of Mr. Bierbaum in his current position at Paier College. Additionally, given the \$5 million prejudgement remedy and the possibility of a civil penalty provision of \$5,000.00 per violation, ACCSC is interested in the availability of those funds and any potential impact to the financial soundness of the school and its ability to meet its obligations and to students in an ongoing and sustainable manner as required under *Section I (C)(1), Substantive Standards, Standards of Accreditation*.

Response Requirements for Section I – III Above:

Paier College must provide complete information to the Commission especially with regard to updates from its ongoing court cases. Accordingly, Paier College must submit the following information:

- a. A copy of the referenced ‘previous decision’ by the court that the state acted reasonably to refuse Stone Academy the opportunity to teach out its students;
- b. Any updates as to the ongoing court cases against Stone Academy, Paier College, and Mr. Bierbaum to include but not limited to copies of any orders or decisions;
- c. A narrative defense, given the Order, as to Mr. Bierbaum’s past record of compliance with state laws and regulations;
- d. Any action by Paier College, given the Order, regarding Mr. Bierbaum’s past record of compliance with state laws and regulations;
- e. Interim financial statements for the period December 1, 2023 through May 30, 2024 prepared in accordance with the [ACCSC Instructions for the Preparation and Submission of Financial Statements](#);
- f. Documentation of the payment or payment agreement with regard to the prejudgement remedy;
- g. A description of the financial impact of the payment of the prejudgement remedy on Paier College’s financial sustainability;
- h. A description of the financial impact of the referenced civil penalty on Paier College’s financial sustainability;
- i. Documentation of the Department’s close out audit;
- j. Documentation of any other disbursements by the Department;
- k. The school’s current enrollment and a response regarding the school’s efforts to ensure that its growth is sustainable and maintains educational quality, to include:
 - i. The number of faculty in contract with the school and the current faculty to student ratio for each course;
 - ii. A narrative regarding the sufficiency of the school’s facilities; and
 - iii. Any other information the school deems salient to its enrollment plans and sustainability.

- Any additional information that may help the Commission to determine the school’s compliance with accrediting standards.

IV. March 11, 2023 OER and Paier College Response

- Paier College must demonstrate successful student achievement by maintaining acceptable rates of graduate employment in the career field for which the school provided education (*Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation*). In response to the March 11, 2023 OER, the school reported the following student achievement rates using a January 2023 Report Date on the Graduation and Employment Charts:

Program (Credential)	Length in Months	Paier Graduation Rate	ACCSC Benchmark Graduation Rate	Paier Employment Rate	ACCSC Benchmark Employment Rate
Photography (AFA)	24	25%	40%	N/A	70%
Photography and Digital Imaging (BFA)	47	100%	40%	100%	

The graduation rate highlighted above falls below ACCSC’s student achievement benchmark rate.⁹ Additionally, the backup charts for the Photography and Digital Imaging (BFA) program do not match the Graduation and Employment Chart. Specifically, while the Graduation and Employment Chart lists only one student in the August cohort, the backup chart lists three students in the August cohort with only one graduate and two students with withdrawn/terminated dates.

Subsequent to the submission of the response to the March 11, 2023 OER, the school submitted the 2023 Annual Report and reported the following student achievement rates using a July 2023 Report Date on the Graduation and Employment Charts:

Program (Credential)	Length in Months	Paier Graduation Rate	ACCSC Benchmark Graduation Rate	Paier Employment Rate	ACCSC Benchmark Employment Rate
Photography (AFA)	24	33%	40%	100%	70%
Photography and Digital Imaging (BFA)	47	100%	40%	100%	
Illustration (BFA)	47	33%	40%	100%	
Interior Design (BFA)	47	33%	40%	100%	
Graphic Design and New Media (BFA)	47	50%	40%	100%	
Fine Art (BFA)	47	50%	40%	100%	

The graduation rates highlighted above fall below ACCSC’s student achievement benchmark rate.¹⁰

In light of the aforementioned discrepancies in the backup documentation for the Photography and Digital Imaging (BFA) program and the graduation rates for the Photography (AFA), Illustration (BFA), and

⁹ Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

¹⁰ Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

Interior Design (BFA) programs falling below benchmark, the Commission determined to request additional information.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. An explanation of the school’s student achievement improvement efforts along with an assessment of the effectiveness of the school’s student achievement improvement efforts;
- b. A Graduation and Employment Chart for Photography and Digital Imaging (BFA), Photography (AFA), Illustration (BFA), and Interior Design (BFA) programs using a **July 2024 Report Date**;¹¹
- c. Summary information for the Graduation and Employment Chart organized according to the corresponding cohort start date reported on the chart (line #1) as follows:
 - i. For each student who started in the program, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Photography	05/01/2020	01/15/2024	N/A
2	12346	Illustration	07/01/2017	N/A	06/01/2021

- 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 field¹² (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Graduation Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification ¹³ (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	Graduation 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	Graduation 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						

¹¹ See the December 21, 2021 ACCSC [Accreditation Alert](#) regarding COVID-19 guidance for student achievement reporting effective for any Graduation and Employment Charts submitted with a January 2022 Report Date going forward.

¹² See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

¹³ *Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation* requires the school to verify the employment classification.

- d. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.
2. Paier College must demonstrate that the school supports student achievement rates through the school’s verifiable records and documentation of initial employment of its and that the employment classifications are appropriate and reasonable based on the educational objectives of the program (*Section VII (B)(1)(b) & Appendix VII, Substantive Standards, Standards of Accreditation*). Specifically, upon review of the records of initial employment relative to the school’s 2022 Annual Report, the evaluation team noted the following employment classifications that do not appear to align with the program objectives as published in the school’s catalog. Further, the evaluation team noted that the third-party verifier was unable to verify or verified as not correct 3 of 11 (27%) of the records provided.

Student Initials	Program	Start Date	Grad. Date	Place of Employment	Date of Initial Employment	Descriptive Job Title
D.C.	Photography	8/27/2018	5/18/2020	Black Bridge Motors	3/2020	Intern
N.C.	BFA- Interior Design	8/25/2015	5/22/2019	Ikea	4/14/2019	Kitchen and Bath/ Active Selling

In response to the March 11, 2023 OER, Paier College stated that “[a]fter further review, D.C. declined Paier College assistance for placement and has not provided any information” (Paier College April 25, 2023 Response, pg. 6). Given further review, it was unclear why this graduate was classified as employed in-field on the 2022 Annual Report and whether removing this graduate would impact the school’s employment rate. Additionally, the documentation provided for N.C. includes a notation “on phone” on the signature line with the title of the person who provided the information as “Kitchen Designer Co-Worker” which would not appear to be written documentation from the graduate or the employer.

In addition, Paier College provided information on six recent graduates. However, in reviewing the forms submitted as backup documentation, the Commission noted the following:

- Three of the graduates are listed as self-employed with initial start dates prior to the program start date, leading the Commission to question whether the employment is based on the program objectives;
- The documentation provided for self-employed graduates does not appear to include the necessary attestations required by *Appendix VII, Standards of Accreditation*;
- The self-employment documentation for Student ID#10054 who graduated in August 2022 appears to indicate plans for the future and only one company for which the student has done freelance work in January 2021; and
- The job title for Student ID#12613 is listed as “Paraprofessional II” for Groton Middle School without any further information to demonstrate this is an in-field placement for the Interior Design program.

As such, the Commission directs Paier College to submit the following:

- a. A description of the school’s process and procedures for recording and verifying graduate employment to include information for self-employed graduates;

- b. The school’s current verification form or other tool described in (a.) above used to verify employment;
- c. For 10 graduates who gained employment in the career for field for which the school provided education from June 1, 2024 to July 1, 2024, provide the following information:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address & Phone #	Date of Initial Employ.	Descriptive Job Title	Job Duties
1	12345	Interior Design	9/1/17	9/10/21	Interior Design Firm, Sally Smith, 123 Sample Way, Anywhere, VA 222.333.1234	10/15/23	Interior Designer	Designing with customers

- d. The following supplementary information to include the corresponding Graduate ID# for each graduate identified in the chart (c.) above:
 - i. A copy of the school’s completed verification form for each graduate employed;
 - ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:
 - The graduate’s name and contact information;
 - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
 - An attestation that the graduate is earning training-related income; and
 - In cases where licensure is required for employment, an attestation that such licensure has been achieved;
 - iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school; and
 - iv. For any of the above forms that include typed signatures, provide corresponding materials to support the validity of the electronic signature (DocuSign, Adobe Digital ID, email submission of form, etc.); and
- e. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.

- 3. Paier College must demonstrate that all monies paid by an applicant are refunded if requested within three days after signing an enrollment agreement and making an initial payment. (*Section I (D)(4)(b), Substantive Standards, Standards of Accreditation*). The school’s catalog references a \$25 non-refundable application fee. Though the cancellation policy as published in the catalog allows for all monies paid to be refunded if requested within three days of the student signing the enrollment agreement, the evaluation team noted through interviews with admissions personnel and review of cancelled enrollment agreements and associated ledger cards that the application fee is not refunded to students if requested within three days.

In response to the March 11, 2023 OER, Paier College stated that:

As the Provost of Paier College, I can confirm that we have recently updated our Catalog to reflect our policy of maintaining a non-refundable application fee of \$25. This decision was made after careful consideration and analysis of our admissions process. We found that a significant amount of time and resources are dedicated to processing and reviewing each application, regardless of whether the applicant is ultimately accepted or not. Therefore, we believe it is fair to charge a fee to cover these costs and to ensure that applicants understand that by applying for consideration, there are resources of the College being applied to the review of their application. Additionally, we have found that many applicants apply to multiple institutions and may not have an interest in attending Paier College. By keeping the application fee non-refundable, we can make certain that only committed applicants apply to our institution.

However, this policy is in conflict with accrediting standards that state that an applicant requesting cancellation within three days after signing an enrollment agreement and making an initial payment is entitled to a refund of all monies paid by the applicant. Therefore, the Commission directs Paier College to update the school's cancellation policy.

As such, the Commission directs Paier College to submit the following:

- a. An updated copy of the school's refund policy as published in the catalog and enrollment agreement to align with accrediting standards;
 - b. Documentation of the return of all monies for any application who cancelled their enrollment within three days; and
 - c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements.
4. Paier College must demonstrate compliance with accrediting standards relative to admissions practices as follows:
- a. Paier College must demonstrate that it executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*). The team found that when students withdraw and choose to re-enroll at a later date, the school and student execute a "Change in Status Form," but do not execute an updated enrollment agreement. Likewise, after enrolling, if a student chooses to postpone enrollment or pursue another program, the school utilizes this same form in lieu of executing an updated enrollment agreement.
 - b. Paier College must demonstrate that prior to enrollment the school determines that an applicant meets the school's admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*). Specifically, the school's enrollment agreement contains fields to denote "college acceptance date," followed by signature and date lines for the President, Student, and Authorized Paier College Representative. Upon review of the dates and signatures noted in the enrollment agreements, it was not clear when the school considers students to be accepted/enrolled, and if this determination is made prior to the student demonstrating that all admissions criteria have been met.
 - c. Paier College must demonstrate that the school furnishes to the student prior to the student starting class, a final copy of the enrollment agreement signed by both parties (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*). Specifically, upon review of 7 current student files, the team noted that the school may have been accepting students into the school after the start date, or the documentation did not make clear when the enrollment agreement was fully executed.

Further, for students that withdrew and then re-enrolled, the school did not appear to execute new enrollment agreements, and as such did not furnish the student with fully executed updated enrollment agreements.

- d. Paier College must demonstrate that a school shall not permit personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement (*Section IV (A)(13), Substantive Standards, Standards of Accreditation*). The evaluation team noted that the enrollment agreement requires signatures from both the President, Joseph Bierbaum and an additional school admissions representative. As such, the documentation did not make clear which personnel is responsible for signing and accepting the enrollment agreement. Additionally, upon review of a draft of the enrollment agreement and a sample of executed enrollment agreements, Mr. Bierbaum's signature appears to be pre-populated. As such, it appears as though Mr. Bierbaum's signature is not indicative of his assessment that prospective students meet the admissions requirements, and as such, admissions personnel appear to be making enrollment decisions.

In response to the March 11, 2023 OER, the school stated that the "policy regarding reenrollments and changes of programs has been updated" and that "we have now changed our policy to include a new enrollment agreement for all reenrollments and for all students who have a change of program" (*Id.*, pg. 9). However, the response does not include any documentation to demonstrate the implementation of this updated policy.

Additionally, "under the new process, the Provost will ensure that all students meet our admissions requirements and sign the enrollment agreement after each student proves they are capable of performing the level of work required by the program curricula before signing" (*Id.*, pg. 10). However, when describing the school's process to ensure that all applicants meet the school's admission requirements, Paier College includes in "Step 5: Decision and Notification" that:

Finally, the Reviewing Coordinator will make a decision on whether to accept or reject the applicant. If the applicant is accepted, they will receive a notification of acceptance and instructions on how to complete their enrollment. If they are rejected, they will receive a notification explaining why they were not accepted and any options they may have to appeal the decision (Id., pg. 13).

This statement appears to indicate that the Reviewing Coordinator is the person who serves as the accepting school official, while the Provost serves only as the person signing the enrollment agreement. However, the school's response also states that:

Moving forward, the Provost will be the designated signer along with the enrolling admissions representative. This change has been made to ensure that all enrollment agreements are reviewed and signed by a member of the college's leadership team. As the Provost, I am committed to ensuring that all enrollment agreements meet our high standards for academic excellence and student success. Regarding the change in the enrollment agreement signing process, I would like to add that the Provost's signature will not only indicate that the student has met the admissions requirements, but it will also be indicative of my assessment of the student's readiness for academic success at Paier College (Id., pg. 14).

While the response states that the Provost will include an "assessment of the student's readiness for academic success," (*Id.*) the response did not include any information to demonstrate how the Provost will make this determination.

In addition, in reviewing the enrollment agreements and admission documentation, the Commission found that some enrollment agreements appear to be signed by the accepting school official prior to receiving all necessary admission documentation. Lastly, the enrollment agreements provided as documentation do not appear to include pagination by providing the page number and the total number of pages in the agreement (i.e., Page 1 of 5, Page 2 of 5, etc.) as required by *Item #19* on the ACCSC Enrollment Agreement Checklist.

As such, the Commission directs Paier College to submit the following:

- a. A copy of the school’s enrollment agreement cross-referenced to the ACCSC Enrollment Agreement Checklist;
- b. A copy of the school’s admissions policies and procedures, specifically identifying the school official responsible for signing and accepting the enrollment agreement, detailing a timeline/ order of events;
- c. A list of all students enrolled between June 1, 2024 and July 1, 2024 in the following format:

Student ID#	Program	Date All Admissions Documentation Secured	Date Enrollment Agreement signed by Student	Date Enrollment Agreement Signed and Accepted by School	Name and Role of Accepting school official	Class Start Date

- d. A copy of the executed enrollment agreement for each student included in the list in (b.) above;
 - e. Copies of the admissions documentation that the school relied upon to determine that the students identified above had met the admissions requirements prior to enrollment; and
 - f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
5. Paier College must demonstrate that that the school consistently ensures all graduation requirements are met prior to graduating as published in the school’s catalog (*Section I (D)(6), Substantive Standards, Standards of Accreditation*). Upon review of 9 graduate transcripts, the team noted that the school classified two students as graduates prior to their meeting the credit hour requirement for graduation.

In response to the March 11, 2023 OER, Paier College stated that:

In the case of the two students in question, it was brought to our attention that they had not met the credit hour requirement. However, upon further investigation, it was discovered that the students had actually met the requirement, but their records had been entered into our SIS system incorrectly.

To ensure that all graduation requirements are met, we have a rigorous process for securing documentation from each applicant. This process involves transcript audits by the Program Chairs and other relevant documentation, as well as working closely with the Dean and Program Chairs to ensure that each student is on track to meet all requirements. (Id., pg. 15)

However, in reviewing the transcripts for 10 recent graduates included as part of the response, the Commission found the transcript for Graduate ID#12682 indicates that the student earned 126 credits for the Bachelor of Fine Arts – Graphic Design program that is approved at 130 credits. As such, it was unclear that the school’s transcript audit is ensuring that all graduation requirements are met.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. An audit of transcripts for graduates since the on-site evaluation along with the number of transcripts incorrectly entered in the school's system;
 - b. A narrative regarding what the school has done to rectify transcripts (e.g., reprinting transcripts and providing them to graduates);
 - c. A list for the ten most recent graduates;
 - d. Copies of the transcripts for the graduates identified in (c.) above; and
 - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
6. Paier College must demonstrate that the school is attentive to its students' educational and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). Results from the student survey conducted during the evaluation indicated the following:
- 33% dissatisfaction with regards to admissions;
 - 26% dissatisfaction with financial aid;
 - 23% dissatisfaction with academic progress
 - 48% dissatisfaction with student services;
 - 36% dissatisfaction with library/learning resource system;
 - 40% dissatisfaction with the facility;
 - 37% dissatisfaction with training equipment;
 - 36% do not feel good about their decision to attend the school; and
 - 50% would not recommend the school to a friend.

In response to the March 11, 2023 OER, Paier College conducted surveys and interviews with current students; a comprehensive review of the existing learning resource system; and focus groups. Based on the findings from these methods, the school "decided to invest in additional resources to improve student services" (*Id.*, pg. 16) and "invested in more opportunities for student engagement and involvement in campus activities" (*Id.*, pg. 17) among other strategies to address concerns related to student services, learning resource systems, and student satisfaction.

Although the Commission acknowledged the initiatives which Paier College indicated it has implemented to improve student satisfaction, the response does not adequately and clearly show whether student satisfaction has improved or if dissatisfaction currently persists. Specifically, the school survey results for only 30 students, as compared to the population during the on-site evaluation of 192, is not substantially similar to the ACCSC survey, and does not address the areas of facilities, training equipment, whether the student feels good about their decision to attend the school, and whether the student would recommend the school to a friend. In addition, only 73% expressed agreement with the statement "I feel safe when at school." Additionally, while the survey indicates that students answered non-Likert scale questions such as "What services would you like to see in the Library," these answers were not included in the response.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A description of any changes implemented, or action taken by the school in response to the responses to the internal student survey regarding whether students feel safe at school and any documentation as to those changes and actions;
 - b. A description of the student survey process (e.g., how and when the surveys were distributed and collected) for at a minimum 50% of the student population, using the ACCSC student survey;
 - c. A detailed analysis of the student survey results—including a comparison of the results with those from the last ACCSC survey—with a particular focus on any results that show less than 80% satisfaction;
 - d. A summary of any trends, isolated incidents, or general problems extracted from the student survey analysis;
 - e. A detailed narrative of the school’s plan to address any areas of student dissatisfaction, 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 be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
7. Paier College must demonstrate compliance with accrediting standards relative to faculty as follows:
- a. Paier College must demonstrate that faculty teaching technical and occupationally related courses in an academic associate or baccalaureate degree program have a minimum of four years of related practical work experience in the subject area(s) taught and possess a related degree at least at the same level of the course the faculty member is teaching. (*Section III (B)(7), Substantive Standards, Standards of Accreditation*). As the school did not appear to have a consistent process for verifying prior work experience for faculty, the team could not assess whether the faculty met this requirement. Additionally, for faculty members G.C. and Z.R., the school could not produce transcripts to show the education requirements were met. Finally, six other faculty demonstrated on resumés experience limited to teaching.
 - b. Paier College must demonstrate that at a minimum, at least 50% of graduate level courses included in the master’s degree programs are taught by faculty members who possess a minimum of four years of related practical work experience and an earned doctorate degree or other terminal degree in a related field of study (*Section III (B)(10)(a), Substantive Standards, Standards of Accreditation*). Out of 7 faculty in the Master’s Degree programs, 3 had doctorate degrees. Additionally, the documentation did not make clear that all faculty could demonstrate the required practical work experience.
 - c. Paier College must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). Upon review of thirty-seven faculty files, the team noted evidence of verification of prior work experience, both practical and academic, with only three of the current faculty.

In response to the March 11, 2023 OER, Paier College provided a list of 31 current faculty, however, the list appears to only include faculty members with last names from A to N. In addition, the response states that:

As the Provost of Paier College, I want to ensure the highest level of academic excellence for our students. To achieve this, we now take great care in verifying the prior work experience of our faculty members and administrators. We have previously received recommendation letters as verification for our faculty and administrators. We also maintain thorough documentation of their academic credentials to guarantee that they possess the necessary qualifications to teach our students. This rigorous process promises that our faculty members are equipped with the knowledge and expertise needed to provide exceptional instruction to our students.

The decision to switch to Paycom was made after a thorough evaluation of various HR software solutions available in the market. We found that Paycom offered the most comprehensive and customizable solution that could meet our specific needs.

With Paycom, we can easily and quickly verify the previous employment of our employees, including their job title, responsibilities, tenure, and salary information. We can also access any performance evaluations or disciplinary actions related to their employment history (Id., pg. 21).

The response, however, does not include any documentation to demonstrate the use of Paycom to complete a verification of prior work experience for all faculty members and administrators. Additionally, as the school did not include the verification of prior work experience, it is unclear that all faculty members are qualified to teach technical and occupationally related courses in an academic associate or baccalaureate degree program.

With regard to demonstrating that at a minimum, at least 50% of graduate level courses included in the master's degree programs are taught by faculty members who possess a minimum of four years of related practical work experience and an earned doctorate degree or other terminal degree in a related field of study, the response refers to the documentation of Enhanced Background Checks that are available from Paycom but does not provide any information to demonstrate these background checks have been completed. In addition, the response includes documentation that the State of Connecticut Office of Higher Education provided a faculty waiver in 2022 for G.C. to teach Photography and an internal memo in 2000 from the Vice President to Human Resources that the BFA requirements have been waived for G.C., however, this documentation does not supersede the requirements of the accrediting standards.

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A roster of faculty for the degree programs;
 - b. The documentation that the school relied upon to demonstrate that the faculty noted in item (a.) above met the requirements for technical and occupationally related courses in an academic associate or baccalaureate degree program, including documentation of academic credentials;
 - c. Documentation to demonstrate that the faculty teaching in Master's Degree programs have the appropriate qualifications individually or a sufficient combination of qualifications overall;
 - d. Evidence that faculty prior work is verified; and
 - e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
8. Paier College must demonstrate that the school's Program Advisory Committees ("PAC") review and comment at least annually on all required areas, that the school gives consideration to PAC input, or that for each master's degree program/ program area, the PAC includes at least two individuals with

graduate level experience (*Section II (A)(4)(b)(i)* and *Appendix III, Substantive Standards, Standards of Accreditation*). Specifically, the minutes provided to the evaluation team did not show sufficient detail regarding the description of members/attendees. Minutes also did not include sufficient and comprehensive detail of the curriculum, the program, adequacy of program objectives, program length, curriculum content, learning resources, facilities and equipment, and student achievement.

In response to the March 11, 2023 OER, Paier College provided PAC meeting minutes from 2021 and 2022 along with the scheduled PAC meetings for 2023. While the response also includes a list of PAC members with qualifications for most program areas, not all lists clearly identify which programs the members are qualified to review. In addition, the PAC members as listed on the meeting minutes do not always match the PAC lists provided and the meeting minutes do not always provide the qualifications for the PAC members in attendance. Additionally, not all PAC meetings appeared to cover all areas (e.g., the learning resource system and student achievement rates).

Based on the foregoing, the Commission directs Paier College to submit the following:

- a. A list of the school’s PACs by program/program area and all corresponding members;
 - b. Written and detailed minutes of all PAC meetings held in 2023 and 2024 that include:
 - i. A description of all members in attendance (i.e., titles and affiliations);
 - ii. An annotation as to which PAC members represent the employment community, and which are qualified to review delivery of distance education; and
 - iii. The date, time, and location of the meeting(s);
 - c. A comprehensive and clear description of the review of and commentary made by PAC members in compliance with *Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation* (the school is reminded that PAC review and comment activities must include all items outlined in *Appendix III, Substantive Standards, Standards of Accreditation*);
 - d. Evidence to show that the school gives consideration to the recommendations of the PAC;
 - e. A schedule for any future Program Advisory Committee meetings; and
 - f. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.
9. Paier College must demonstrate that the school’s catalog contains all items required by the ACCSC Catalog Checklist (*Section IV(C)(1)(a), Substantive Standards, Standards of Accreditation*). Upon review of the catalog, the evaluation team noted discrepancies in the credit hours awarded as compared to ACCSC approvals. In response to the March 11, 2023 OER, Paier College provided a copy of the catalog cross-referenced to the ACCSC Catalog Checklist. However, in reviewing the credits listed in the catalog on page 844 of the response, the Commission continued to note discrepancies in the number of credits listed. As such, the Commission directs Paier College to provide an updated catalog cross-referenced to the ACCSC Catalog Checklist.

Warning Restrictions:

Pursuant to *Section VII (K)(8), 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 including a reference to where this notice can be found on ACCSC's website (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

Institutional Teach-Out Plan

Paier College must submit a completed ACCSC [Institutional Teach Out Plan](#) to provide assurance that the school will fulfill its obligations to students in the event of a closure.

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.

Paier College must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards. ACCSC has resources for submitting a well-documented and organized response for Commission consideration. As a reminder *Section I (H)(1) Rules of Process and Procedure, Standards of Accreditation*, states that all submissions and notifications must be organized as required by the ACCSC Instructions for Electronic Submission. More information is available on the [ACCSC website](#) under [Resources](#) and [Forms and Reports](#).

When preparing the response, please keep in mind the following:

- The school's response should be as clear and comprehensive as possible in order to demonstrate compliance with accrediting standards;
- The school's responses must include a restatement of the Findings or Additional Information Required, followed by a narrative response, and include, where necessary, complete and appropriate documentation to demonstrate compliance with accrediting standards;
- The school's response should also include information relative to any changes, improvements, or developments that might influence the Commission's evaluation of the school's compliance with accrediting standards;
- If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information; and
- Please indicate the date of an effective change and provide supportive documentation that substantiates the change.

Paier College must upload the school's 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 Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

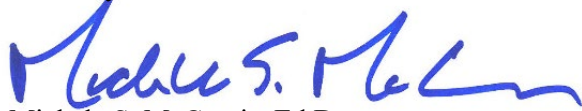
Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the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

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before July 5, 2024**. 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 July 5, 2024**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact Maurice Gatewood at mgatewood@accsc.org or 703.247.4525. 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 Alicia DeMartini at ademartini@accsc.org or Richard Rice at rrice@accsc.org.

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c: Christie DeGregorio, cdegregorio@paier.edu
Christopher Connelly, cconnelly@paier.edu

Encl.: Public Disclosure – Summary of Grounds for Warning Action

ACCSC DISCLOSURE OF COMMISSION ACTION SUMMARY OF GROUNDS FOR WARNING ACTION

**PAIER COLLEGE
SCHOOL (#M000242)
84 IRANISTAN AVENUE
BRIDGEPORT, CONNECTICUT 06604**

JUNE 4, 2024

The Accrediting Commission of Career School and Colleges has issued a Continued Warning to Paier College located in Bridgeport, Connecticut. Pursuant to ACCSC's *Rules of Process and Procedure*, the Commission will publish a summary of the reasons for the Warning. The school has an opportunity to submit a response to demonstrate corrective action regarding the Commission's grounds for the Warning.

Original date of Warning: August 7, 2023

Next review date: August 2024

SUMMARY OF GROUNDS

1. Pursuant to *Section I (A)(2), Substantive Standards, Standards of Accreditation*, Paier College must demonstrate that all owners, members of school management, and administrative employees have past records that demonstrate a commitment to:
 - a. Providing quality education to students;
 - b. Ethical, fair, and honest practice; and
 - c. Compliance with accrediting standards and applicable federal, state, and local requirements.
2. Paier College must also demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*).
3. Paier College must demonstrate successful student achievement by maintaining acceptable rates of graduate employment in the career field for which the school provided education (*Section VII (B)(2)(b), Substantive Standards, Standards of Accreditation*).
4. Paier College must demonstrate that the school supports student achievement rates through the school's verifiable records and documentation of initial employment of its and that the employment classifications are appropriate and reasonable based on the educational objectives of the program (*Section VII (B)(1)(b) & Appendix VII, Substantive Standards, Standards of Accreditation*).
5. Paier College must demonstrate that all monies paid by an applicant are refunded if requested within three days after signing an enrollment agreement and making an initial payment. (*Section I (D)(4)(b), Substantive Standards, Standards of Accreditation*).
6. Paier College must demonstrate compliance with accrediting standards relative to admissions practices as follows:

- a. Paier College must demonstrate that it executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*).
 - b. Paier College must demonstrate that prior to enrollment the school determines that an applicant meets the school's admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*).
 - c. Paier College must demonstrate that the school furnishes to the student prior to the student starting class, a final copy of the enrollment agreement signed by both parties (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*).
 - d. Paier College must demonstrate that a school shall not permit personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement (*Section IV (A)(13), Substantive Standards, Standards of Accreditation*).
7. Paier College must demonstrate that that the school consistently ensures all graduation requirements are met prior to graduating as published in the school's catalog (*Section I (D)(6), Substantive Standards, Standards of Accreditation*).
 8. Paier College must demonstrate that the school is attentive to its students' educational and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*).
 9. Paier College must demonstrate compliance with accrediting standards relative to faculty as follows:
 - a. Paier College must demonstrate that faculty teaching technical and occupationally related courses in an academic associate or baccalaureate degree program have a minimum of four years of related practical work experience in the subject area(s) taught and possess a related degree at least at the same level of the course the faculty member is teaching. (*Section III (B)(7), Substantive Standards, Standards of Accreditation*).
 - b. Paier College must demonstrate that at a minimum, at least 50% of graduate level courses included in the master's degree programs are taught by faculty members who possess a minimum of four years of related practical work experience and an earned doctorate degree or other terminal degree in a related field of study (*Section III (B)(10)(a), Substantive Standards, Standards of Accreditation*).
 - c. Paier College must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*).
 10. Paier College must demonstrate that Program Advisory Committees review and comment at least annually on all required areas, that the school gives consideration to PAC input, or that for each master's degree program/ program area, the PAC includes at least two individuals with graduate level experience (*Section II (A)(4)(b)(i) and Appendix III, Substantive Standards, Standards of Accreditation*).
 11. Paier College must demonstrate that the school's catalog contains all items required by the ACCSC Catalog Checklist (*Section IV(C)(1)(a), Substantive Standards, Standards of Accreditation*).