***Department of Higher Education***

***State of Colorado***

*Institutional Review*

***Concorde Career College, Aurora***

***October 31, 2021***

CONSULTANTS REVIEW OF RESPONSE TO OUR REPORT

**Consultants’ Note**

Concorde Career Colleges responded to our July 26, 2021 report on September 17, 2021, providing an additional 534 pages of documentation. In this document, we address Concorde’s response to each of the Institutional Recommendations from our initial report.

1. **Provide documentation clarifying the status of institutional accreditation by ACCSC.**

The response is satisfactory, and ACCSC staff verified that accredited schools are still considered accredited while review is underway, even if the stated end date for the prior period is past.

1. **Resolve the inconsistency about ACCSC accreditation demonstrated through the Concorde Catalog & website on the one hand, and the ACCSC Directory on the other.**

The inconsistency persists, but the ACCSC directory is beyond the control of Concorde. The satisfactory response to Recommendation 1 is sufficient.

1. **Provide justification for the requirement that students sign an arbitration agreement and class action waiver as a condition of enrollment**

The response was “*Concorde’s arbitration agreement and class action waiver is permissible under the applicable regulations of the U.S. Department of Education.*” Permissibility is not a justification in and of itself, and we remain concerned about the extent of students’ ability to resolve disputes with the institution. In our many years reviewing colleges and universities for Colorado and other states, this is the first time we have encountered such requirements for enrollment.

1. **Clarify whether Concorde plans to obtain nursing-specific program accreditation. If so, provide the timeline for achieving this accreditation.**

The response is satisfactory:
*“Concorde will pursue national nursing accreditation thru the Accreditation Commission for Education in Nursing (ACEN). Application will be made after the first cohort starts and a site visit will be conducted by ACEN while students are in the first cohort. ACEN could then grant Initial Accreditation upon graduation of the first cohort, after official NCLEX RN® pass rate outcomes are available for review.”*

1. **Provide an organizational chart for the Aurora campus.**

The response is satisfactory.

1. **Provide corporate bylaws.**

The response is satisfactory. The bylaws date from 1988.

1. **Provide CVs for the administrative leadership.**

The response is satisfactory.

1. **Provide a timeline for hiring BSN program leadership (e.g., a Director of Nursing Education Program) and describe their role in hiring or other program startup activities.**

The response is satisfactory.

1. **Provide information about faculty, including:**
	1. **CVs of current faculty who will teach in the BSN program**

The response is satisfactory.

* 1. **Description of faculty responsibilities**

The response is satisfactory.

* 1. **Faculty position descriptions (for both General Education and BSN technical faculty)**

The response is satisfactory.

* 1. **A Faculty Handbook or other employee policy manual**

The response is satisfactory.

* 1. **Indication of the existence of a Curriculum Committee or any faculty committees**

The response is satisfactory.

* 1. **An organizational chart for the faculty or indication of how they interface with the Administration**

The response is satisfactory.

* 1. **Description about faculty course/workload**

The response is satisfactory. Workload is 28-32 hours of direct student contact.

* 1. **Information about whether there are promotion pathways or a tenure system for faculty**

The response is satisfactory. There is no tenure system.

* 1. **Information about the budget for faculty salaries, professional development, and benefits**

The response is satisfactory.

* 1. **Credential expectations for faculty, and a process for evaluating them**

The response is satisfactory.

* 1. **Indication about the number of full-time/permanent vs adjunct faculty**

The response is satisfactory.

* 1. **Explanation of how General Education and Nursing Program Faculty members will communicate.**

This was not clarified through the response directly, but it is implied through the answer about curriculum development.

1. **Provide the library budget and details of information resources that will support the BSN program.**

The response is satisfactory.

1. **Detail the Tutoring and Graduate Placement services offered, including what the services encompass, who provides the services, and how they are accessed by students.**

The response is satisfactory, though the implication is that the faculty provide all tutoring services, and it is unclear whether the 28-32 direct student contact hours is exclusive of tutoring.

1. **Describe Advisory Committees, including their role in program development and evaluation, frequency of meetings, and qualifications of members.**

The response is satisfactory.

1. **Clarify whether it is possible be a part time student in the BSN program.**

The response is satisfactory. There is no part time option.

1. **Clarify whether the BSN program is in addition to or a replacement for the Practical Nursing program.**

The response is satisfactory. The BSN is an additional program, not a replacement.

1. **Clarify whether courses in the current Practical Nursing diploma program will apply toward the new degree requirements.**

The response is satisfactory:

*“no transfer credit is available for a graduate of a Practical Nursing program to the BSN program.”*

1. **Provide General Education Learning Outcomes for the BSN program.**

The response is satisfactory.

1. **Provide Course Learning Outcomes for BSN program courses.**

The response is satisfactory.

1. **Provide syllabuses for BSN courses including General Education courses.**

The response is satisfactory.

1. **Provide student course assessment materials for the BSN, or describe the process by which such materials will be developed.**

The response is satisfactory.

1. **Provide examples of the measurement tools outlined in the Resource Assessment Matrix (graduate, employer, and end of course surveys; Advisory Board Review forms; faculty meetings or observations).**

The response is satisfactory.

1. **Explain the rationale for the anticipated 1.5% annual attrition rate.**

The response is satisfactory:

*“The 1.5% attrition rate referenced is a monthly rate, not an annual rate. ACCSC standards require a program of more than 24 months in length to meet a graduation rate benchmark of 40%. As the program will take approximately 33 months to complete, a 1.5% monthly attrition rate will yield a graduation rate of 50.5%. The program will strive to improve this rate, but budgets are built on tuition revenue generated with this monthly rate.”*

**Concluding Remarks**

Overall, Concorde Career College’s responses to our recommendations are satisfactory, and we support moving their application forward for the BSN program.

**Consultants**

**Cathy Chudzinski, Ohio
Marc Gartler, Wisconsin**