



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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<http://www.accet.org>

January 7, 2016

VIA EMAIL & Federal Express
(jbrent@bse.edu)

Mr. James Brent
CEO & President
Brensten Education (fka PC ProSchools)
20633 Watertown Court
Waukesha, WI 53186

***Re: Quality Assurance Visit Report/Response Reviewed;
Interim Report Reviewed;
Complaints Reviewed;
Cease Enrollments – Computer Support Specialist/
Network Administration Associate Degree program;
Institutional Show Cause Continued;
Follow-Up Visit Required;
Additional Interim Report Required;
ACCET ID #1235***

Dear Mr. Brent,

At its December 2015 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) reviewed the report of the Quality Assurance Visit (QAV) that was conducted at your institution by ACCET on October 7, 2015 and the institution's response to that report, dated November 5, 2015. Additionally, the Commission reviewed the institution's interim report, dated December 4, 2015, in response to the Commission's November 23, 2015 letter, which placed the institution on show cause due to serious issues identified in multiple complaints filed against the institution (complaint #s 1331, 1345, 1347, and 1354) and in a report prepared by the Wisconsin Educational Approval Board (EAB), based on a state visit conducted on November 12, 2015.

The Commission's November 23, 2015 letter placed the institution on Institutional Show Cause and directed the institution to submit an interim report to include the following six items: 1) a copy of the institution's response to the Wisconsin Educational Approval Board letter dated November 20, 2015, including the institution's Program Termination Plan; 2) the number of graduates/students in each specific cohort of the associate degree program (by start date and actual/scheduled graduation date) who are eligible, or who are potentially eligible, for the Earn to Learn program and/or reimbursement under the Federal Student Loan Repay initiative, along with documentation of changes made to the qualification requirements for the Earn to Learn and loan repay initiatives, if any, dating from inception to current date, with information on which cohorts of students are

subject to which versions; 3) the dollar amount of loans that the institution is liable, or is potentially liable, for repaying to graduates, and the number of years that this liability extends into the future; 4) a list of students who have withdrawn or been terminated in calendar year 2015, with their start dates, end dates, and reason for withdrawal/termination; 5) internally-generated financial statements (balance sheet and income statement) for the period January 1 through October 31, 2015; and 6) a draft teach-out plan, following the guidelines in ACCET Document 32 – Teach-Out/Closure Policy, to establish that the institution has processes in place in the event of closure, ensuring that students are protected.

Upon review of the QAV report/response, the four complaints, and the interim report, received December 4, 2015, the Commission voted to continue the institutional show cause directive, to cease enrollments in the Computer Support Specialist/Network Administration associate degree program, and to require a follow-up visit to be conducted to the institution in the April 2016 review cycle. The institution was directed to show cause why its accreditation should not be withdrawn due to serious concerns regarding the institution's stewardship of its associate degree program and the institution's financial capability and responsibility.

The Commission acknowledged that the institution's incomplete interim report was due, in part, to the limited time available to prepare the response by the December 4, 2015 deadline to facilitate commission review. Therefore, the Commission directed the institution to submit an additional interim report to include the specific items identified below, many of which were previously requested:

1. While the institution provided an exhibit labeled "EAYL," which appeared to have information regarding which students were part of the Earn As You Learn and Federal Loan Repay initiative programs, the institution did not provide any narrative or explanations for the exhibit or how it was derived to enable the Commission to analyze the exhibit. For example, the Commission noted that the entries for a number of students indicated, "Qualifies no payment because overpaid." Additionally, while the institution indicated it was enrolling students through May 2015, the Commission noted that only one student on the list has a 2015 start date. The institution did not provide information on the eligibility requirements for either the Earn As You Learn or Federal Loan Repay Initiative programs, any changes in requirements, or which cohorts were subject to a given program and version.

Therefore, the institution is directed to provide:

- a) **the names of graduates/students in each specific cohort of the associate degree program (by start date and actual/scheduled graduation date) who are eligible, or who were potentially eligible, for the Earn As You Learn program and/or reimbursement under the Federal student loan repay initiative, as well as the financial liability owed each student under these programs. The institution must provide a narrative to guide the review of any comments in the spreadsheet.**
- b) **A chronology and documentation of changes made to the qualification requirements for the Earn As You Learn and Federal Loan Repay initiatives, if**

any, dating from inception to current date, with information on which cohorts of students are subject to which versions.

- c) **An explanation of why none of the institution's 2014 or 2015 enrollments are eligible for the federal loan repay initiative, as well as why only one of the 2015 enrollments is eligible for the Earn As You Learn program.**
2. The institution did not provide financial statements as directed in the November 23, 2015 Commission Action letter. The Commission notes that as part of ACCET Document 27 – Policy for Financial Reporting and Financial Stability, the institution is required to review its financials at least quarterly, and questions why no financials could be provided.

Therefore, the institution is directed to provide internally-generated financial statements (balance sheet and income statement) for the calendar year 2015. The Commission notes that, since the Loan Repayment and the Earn As You Learn programs become a potential liability on Brensten's books once an eligible student starts classes at Brensten, internally generated financials should portray these liabilities. The institution is also to provide its internal procedures for keeping records of these liabilities, as well as the repayment schedule for the Federal Student Loan Repay Initiative.

3. The institution did not provide a draft teach-out plan as directed in the November 23, 2015 Commission Action letter.

Therefore, the institution is directed to provide a draft teach-out plan, following the guidelines in ACCET Document 32 – Teach-Out/Closure Policy, to establish that the institution has processes in place in the event of closure, ensuring that students are protected.

4. At the time of the Quality Assurance Visit, the Federal Program Review report dated January 14, 2015 detailed 13 findings that required a response from Brensten Education by November 11, 2015, with two of the 13 findings still outstanding, namely:
 - a. Brensten failed to complete verifications for eight students during the 2012-13 award year and three students during the 2013-14 award year.
 - b. Brensten has not developed an adequate verification policy or procedure as evidenced by the above finding.

In its response, the institution noted that it had received an extension to December 29, 2015 from the US Department of Education (ED) on the remaining two findings.

Therefore, the institution is to provide a copy of its submission to ED and, when available, a copy of the Final Determination Report, and all official correspondence to and from ED, within 10 days of receipt.

5. The Quality Assurance Visit report noted that the year-to-date placement rate for the Computer Support Specialist/Network Administrator was below benchmark at 59% (58 eligible/34 placed). In its response, the school stated that it is continuing to work with the past graduates from January – September to assist in placement and that it is confident that it will secure the additional seven placements necessary and be at benchmark at the end of the reporting cycle; however, the response did not include any supporting documentation.

Therefore, the institution is directed to provide updated Document 28.1s - Completion and Placement Statistics for the Computer Support Specialist/Network Administrator program for the period of January-September 2015 with all supporting documentation for new placements and waivers since the Quality Assurance Visit.

6. In its response to the EAB on-site visit report the school states that it stopped accepting enrollments into the Associates Degree Program, with the last cohort start date of May 26, 2015. In its response to the November 23, 2015 Commission Action letter, the institution states that it intends to complete the associates degree program and move back to short term offerings. The response also provided a listing of 168 withdrawn students with last dates of attendance in 2014 and 2015 year-to-date.

Therefore, the Commission acknowledges the planned teach-out of students in the Computer Support Specialist/Network Administration Associate Degree program, and formally directs a cessation of enrollments. Further, the institution is directed to provide:

- a. **Document 28.1s for the associate degree program for all cohorts scheduled to graduate in 2015 and 2016;**
 - b. **A listing by name and, if applicable, the last four digits of the social security number of all students in the associates degree program and their estimated graduation dates, the status of unearned tuition, and account balances;**
 - c. **The date when all current students will complete the program;**
 - d. **Procedures to insure that the delivery of training and student services, including financial aid and job placement, will not be materially disrupted and that obligations to students will be timely met; and**
 - e. **A narrative relative to the institution's plan to continue operations without the associate degree program, including the number of students currently enrolled in its remaining ACCET approved programs, including: Help Desk/MCSA, Help Desk/MCSA - IDL, Help Desk/Network Administration IDL, MEAN Stack, Mobile Application Development IDL, Network Engineer and Administrator Program, and Web Application Development.**
7. The Commission determined that more detailed information about the Earn As You Learn and Federal Loan Repay initiatives are required, to demonstrate fair and equitable processing as required by ACCET Standard III.B - Financial Procedures.

Therefore, the institution is directed to provide a narrative regarding these two initiatives, including 1) a listing of students and graduates who elected to accept a flat fee, in any amount, in lieu of an extended monthly payout on their loan repayments for the Federal Loan Repay initiative and how the institution ensures that students understand that this flat fee is significantly less than the sum total of the monthly payments toward the entire balance; and 2) complete policies and procedures governing both initiatives, to include:

- a. Where program descriptions and requirements are published**
- b. Minimum requirements necessary for participation in each program**
- c. Any forms that students must complete in order to qualify**
- d. Deadlines and timeframes that students must follow to remain qualified**
- e. Timeframe and criteria used by the school to make payments to students under the Earn As You Learn program**
- f. Timeframe and criteria used by the school to make payments to students under the Federal Loan Repay initiative**
- g. Steps taken by the institution to ensure that loan repayment funds are available for the life of each loan under the Federal Loan Repay initiative**

A copy of this report, including the attached interim report cover sheet, must be emailed to interimreports@accet.org for receipt at the ACCET office no later than **January 22, 2016**.

As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at www.accet.org.

The Commission also directed a follow-up visit to take place prior to the April 2016 Commission meeting to investigate serious issues raised in the complaints and the EAB report. The visit will address issues relative to the operation of the institution's associate degree program and the institution's financial capability and responsibility, including, but not limited to: (1) high student attrition in the OAD program; (2) changes in the schedule and requirements of the OAD program; (3) the continuation of students services by qualified placement and financial aid personnel; and (4) the institution's Federal Loan Repay initiative and the Earn As You Learn program.

The follow-up visit must take place prior to the April 2016 Commission meeting. Therefore, it is imperative that the institution submit a copy of ACCET Document 8 – Visit Request Form, requesting a two-person, one-day on-site evaluation visit and the on-site visit fee of \$3,800 (refer to ACCET Document 10 – Fee Schedule) for receipt at the ACCET office no later than **January 15, 2016**, to allow for appropriate scheduling of the on-site visit and subsequent review by the Commission. These documents are available on our website at www.accet.org.

In accordance with ACCET policy, the institution is restricted while under a show cause directive from making any substantive changes including, but not limited to, new programs, major program revisions, new branch campuses or other new sites, or relocations out of the general market area.

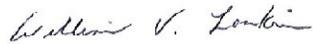
Brensten Education (fka PC ProSchools)

January 7, 2016

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Your demonstrated capabilities and commitment in support of the institution's accredited status are essential to a favorable outcome in this process. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,



William V. Larkin, Ed.D.

Executive Director

WVL/jss

Enclosures: Interim Report Cover Sheet
Invoice for On-site visit fee

CC: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)
Mr. Douglas Parrott, ACD - Chicago/Denver, US ED (douglas.parrott@ed.gov)
Mr. Ron Bennett, Director, School Eligibility Service Group, US ED (ron.bennett@ed.gov)
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