

January 5, 2023 VIA EMAIL info@portlandfashioninstitute.com

Ms. Sharon Blair Director Portland Fashion Institute 2111 NE 43rd Avenue Portland, OR 97213

> Re: Reaccreditation Deferred Institutional Show Cause Issued Interim Report Required ACCET ID #1543

Dear Ms. Blair:

At its December 2022 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) considered the application for reaccreditation of Portland Fashion Institute, located in Portland, Oregon, the team report (on-site evaluation visit conducted September 19–20, 2022), and the institution's response to that report, received October 26, 2022.

Upon its review, the Commission voted to defer consideration regarding reaccreditation and to continue the institution's accredited status, pending further review at its April 2023 meeting. Additionally, the Commission expressed serious concern regarding the institution's use of an unapproved location prior to the receipt of a use and occupancy certificate, and therefore issued an institutional show cause directive requiring the institution to show cause why its accredited status should not be denied.

Therefore, the Commission directed the institution to submit an interim report for review at the April 2023 meeting to include the following specific items:

1. Standard II.A – Governance

The team report indicated that the institution is operating at an unapproved location and has not yet applied for a change of location with ACCET. It was observed during the visit that a class was held at the unapproved site.

In its response, the institution indicated that they are in the process of "building out" new classrooms in a new facility. However, several external factors created delays in a build-out project due to supply chain, labor, and staff shortages at the permitting agency. The Commission expresses serious concern that the institution is holding classes at this unapproved location that may still be an active construction site.

Therefore, the institution is directed to provide a narrative update on this issue to include the status of the new location and evidence that the institution's Document 26.4 – Change of Location Application has been submitted to ACCET. The institution is reminded that no classes are to be offered at a site that does not have ACCET approval. To ensure

the safety of students and faculty, the institution is directed to cease holding classes within the new building until it retains a valid Certificate of Occupancy/Fire Safety Certificate and has received ACCET approval.

The institution is reminded that ACCET Document 26 – <u>Policy on Additional Locations and Changes of Locations</u> requires that at least 30 days prior to the anticipated date of the change of location, the institution must submit completed ACCET Document 26.4 – <u>Change of Location Application</u>, along with the required supporting documentation and processing fee, as specified in ACCET Document 10 – <u>Fee Schedule</u>.

2. Standard III.B – <u>Financial Procedures</u>

The team report indicated that the institution was unable to provide Document 941s for review by the team with proof of timely payment for the last four quarters.

In its response, the institution provided Document 941s for the last four completed quarters (Q3 and Q4 2021, and Q1 and Q2 2022); however, evidence of payment of the appropriate taxes associated with the Document 941s was not included in the response.

Therefore, the institution is directed to provide documentation to evidence that payroll taxes have been paid in alignment with the institution's Document 941s for Q3 and Q4 2021, and Q1 and Q2 2022, as required.

3. Standard – VII.A. Recruitment

The team report indicated that the institution's website currently lists the institution as a non-profit organization. While approval has been given by the state of Oregon, the institution is still awaiting a final IRS determination.

In its response, the institution confirmed that the final 501c3 is pending with the IRS and indicated that final approval is expected in December 2022.

Therefore, the institution is directed to provide a narrative update on this issue to include its status with the IRS. If 501c3 approval from the IRS is yet to be obtained, the institution must demonstrate that it has removed all advertising referencing a non-profit status. The institution must provide its updated catalog and evidence that the revised catalog has been made available to current and prospective students.

If the institution can demonstrate approval of its 501c3 status from the IRS, the institution must provide evidence of documentation of completion of ACCET Document 22 – <u>Policy on Change of Ownership and/or Control.</u>

4. Standard: IX.D – <u>Completion and Job Placement</u>

The team report indicated that the Apparel Entrepreneur program completion rate was below benchmark for 2022 (partial year) at 33.33%. The Apparel Design 2021 program was also below benchmark for completion at 22%. Additionally, the team noted several errors which led to incorrect calculations. The institution's ACCET Document 28.1 for Apparel

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Design for 2021 indicated erroneous percentages related to waivers: 250% placement waivers, with only two completers, but five placement waivers, resulting in inaccurate placement numbers.

Finally, the institution's ACCET Document 28.1 Apparel Entrepreneur 2022 program was completed incorrectly as it indicated one gross start and one transfer out, resulting in no eligible completers. However, the Document 28.1 indicates one completer and one placement, even though there are no eligible completers for the cohort.

In its response, the institution provided updated ACCET Documents 28.1 – <u>Completion and Placement Statistics</u> reflecting the following rates:

- Apparel Entrepreneur 2022 (January 1–June 30): Completion = 100% (1 completer/1 eligible), Placement = 100% (1 placed/1 eligible)
- Apparel Designer 2021: Completion = 40% (2 completers/5 eligible), Placement = 100% (2/2)

However, the institution did not provide documentation to support the revised 28.1. Nor did the institution provide evidence of policies and procedures or staff training to ensure the errors noted by the team are not repeated.

Therefore, the institution is directed to provide a narrative update, including revised internal completion and job placement policies outlining responsible parties and steps taken to ensure accurate data collection in compliance with ACCET Document 28 – Completion and Job Placement Policy, as well as evidence of staff training.

The institution is also directed to provide updated ACCET Document 28.1s – <u>Completion and Placement Statistics</u> for partial-year 2022 (January 1–October 31) for the Apparel Designer and Apparel Entrepreneur programs to ensure continued compliance. The institution is to provide complete supporting documentation for all placements and waivers referenced to completed copies of ACCET Document 28.2 – <u>On-Site Sampling Verification</u> form for each <u>Scheduled to Graduate</u> (column 3) cohort on the respective Documents 28.1 to demonstrate systematic and effective implementation of the revised policies.

The institution's response, including the attached **interim report cover sheet**, must be uploaded (link provided below) no later than **February 28, 2023**, for the institution's report to be considered further at the Commission's April 2023 meeting. Please see the attached submission instructions.

ACCET Dropbox upload link: https://www.dropbox.com/request/owwNFFSirPC8ai6OKh25

As a reminder, a \$500 late fee will be charged to an institution for the late submission of an interim report. Please see (page 6 of) <u>ACCET Document 10 – Fee Schedule</u> for additional information.

Deferral of reaccreditation is not an adverse action and is explained in ACCET Document 11 – <u>Policies and Practices of the Accrediting Commission</u>, which is available on our website at www.accet.org. The deferral of a final decision is intended to allow for an opportunity to clarify or

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resolve the issues of concern cited herein, specifically focused on the demonstration of systematic and effective implementation of revised policies and procedures in practice over time. In accordance with Commission policy, no substantive changes, including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, or relocation out of the general market area, will be permitted during the term of the deferral period.

The institution is reminded that a show cause directive is not an adverse action, as defined in ACCET Document 11, but rather a statement of such serious concern that the institution must provide sufficient evidence to demonstrate that it does, in fact, comply with the ACCET standards, policies, and procedures such that its accreditation should not be withdrawn. While on a show cause directive, no requests for substantive changes or applications for new programs will be considered without prior written review and approval by the Commission.

The appropriate state and federal education officials will be notified of this action by copy of this letter. Should you have any questions or need further assistance, please contact the ACCET office at info@accet.org or 202-955-1113.

Sincerely,

Res Helfer

Executive Director

RH/bh

Attachments: Interim Report Cover Sheet

Interim Report Submission Instructions

cc: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)

Ms. Charity Helton, Accreditation Division, US ED (charity.helton@ed.gov)

Dr. Sean Pollack, Program Administrator, OR Higher Education Coordinating Commission (sean.pollack@state.or.us)