



**Maryland Higher Education Commission  
Academic Affairs Division  
Career and Workforce Education**

**New Private Career School Applicant Workshop**

Workshop for entities who are interested in applying to own and operate a Private Career School in Maryland.

You are required to attend this workshop before you submit a New Private Career School application.

# Housekeeping

1. Enter your name, email and school in the chat.
2. Make sure that only the invited participants from your school are present. It should be the Owner and 1 other person. If anyone else joins they will be removed.
3. Your camera **must** be on at all times.
4. You **must** attend the entire presentation to receive credit.
5. Save your questions until the end of the presentation. Feel free to enter in chat.



# Agenda

- I. Introduction to MHEC
- II. Private Career School Responsibilities (40%)
- III. New School Application (50%)
- IV. Q & A Session (10%)

# Introduction to MHEC

**We are a State-approving agency. We do not accredit schools.**

Department of Academic Affairs

Department of Finance and Administration

Department of Outreach for Public, Student, Legislative and Corporate Relations

# Career & Workforce Education Unit



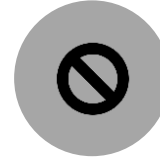
GENERAL  
INQUIRIES



PRIVATE  
CAREER SCHOOL  
APPLICATIONS



EXISTING  
SCHOOLS-  
MODIFICATIONS  
AND  
COMPLIANCE



SCHOOL  
CLOSURES



DATA BOOK  
COLLECTION



STUDENT  
COMPLAINTS



TRANSCRIPTS  
(ALL CLOSED  
INSTITUTIONS)



OSFA – RELATED  
\* JACK TOLBERT GRANT



A prospective training provider may submit a

*Training Provider Questionnaire*

to determine whether Commission approval is required to legally offer the provider's training in Maryland.



Commission approval is required before a training provider may offer occupational or job preparatory training to the general public.



MHEC helps to establish and maintain basic, minimum quality standards for all Maryland private career schools to assure that the approved job preparatory training being provided *by* those schools is of *benefit* to students ...

Providing certain *protections* to students enrolled in the approved programs of Maryland private career schools.

*Education Article, the Annotated Code of Maryland*







# **Private Career School Responsibilities**

# **Private Career School Responsibilities**

Code of Maryland Regulations (COMAR)

Title 13B, Subtitle 01, Chapter 01

Approved private career schools must adhere to the regulations outlined in [COMAR 13B.01.01](#).

Private career schools applicants must read and familiarize themselves with [COMAR 13B.01.01](#).



## **Private Career School Responsibilities**

- ✓ To operate and deliver programs in the manner approved by MHEC
- ✓ To adhere to all of the School's approved policies
- ✓ To keep complete and well-maintained accurate student records



# Private Career School Responsibilities

All programs must be consistently *delivered* as approved by the Maryland Higher Education Commission.

That includes:

- ✓ Adhering to the approved curriculum
- ✓ Adhering to the *delivery* of the approved curriculum (the *way* the School promised to teach it)
- ✓ Adhering to the qualifications of the instructors
- ✓ Adhering to the student:instructor ratio(s)



# Private Career School Responsibilities

The School must be *operated* as approved by MHEC.

That includes:

- ✓ The approved facility location remaining unchanged
- ✓ Maintaining equipment in sufficient number and quality for all students
- ✓ Not exceeding the maximum class size(s) and overall tuition liability / enrollment limitation
- ✓ Adhering to the approved advertisements / promotions
- ✓ Adhering to the approved enrollment / admissions process
- ✓ The School's ownership remaining unchanged



## Private Career School Responsibilities

**Clear** and **precise** school policies are extremely important. They help assure that **BOTH** the School and the student understand limits and expectations.



## Private Career School Responsibilities

Once the School is approved to operate, these policies become the School's "rules to live by" and *cannot be changed* without the prior notification and approval of the Commission.

These policies are the framework upon which the School has promised the Commission it will do business with its students.



# Private Career School Responsibilities

Changes to any of the following require approval:

- Admissions
- Attendance
- Academics
- Satisfactory Progress
- Completion / Graduation
  - Leave of Absence
    - Refunds
    - Withdrawals
  - Re-Admittance
- Complaint Policy and Procedures
- Credit Granted for Previous Training / Experience





# Private Career School Responsibilities

## Student Records

The School is responsible for *tracking* and *documenting* student progress from the time a student enrolls through the time the student leaves (withdrawals, dismissals, graduations).

This “*paper trail*” must be contained in each student’s permanent file in perpetuity (forever).



# Private Career School Responsibilities

## Student Records (COMAR 13B.01.01.11)

How long must records be maintained?

*The required student files must be maintained forever.*

How long must records be maintained on site?

*Student records must be accessible to MHEC staff upon inspection. A school must have at least the last 5 years of student records on site.*

How must records be maintained?

*Paper form or electronic form is acceptable however they need to be accessible to MHEC staff and easily delivered in the event that the school closes. Paper files must be stored in a fireproof, file cabinet. We strongly encourage that you back up your records regularly to avoid any loss of data. We prefer that the records are digitized in the event of a school closure.*



## Student Records include...

- Documentation that *all* admissions criteria are met
- A completed and accurate enrollment agreement
- A student's up-to-date attendance records and academic achievements
- An up-to-date record of the student's financial account
- For Withdrawals and Terminations: up-to-date student transcript, documents concerning the withdrawal circumstances, and *refund calculations (if applicable)*
- For Graduates: a complete student transcript, copy of certificate/diploma, and *placement tracking*



## Student Records include...

- *Signed* and *dated* documentation / records of counseling or advising sessions
- Academic or attendance *probation* notification
- Leave of absence documentation
- *Changes* made to the enrollment agreement (acknowledged by the school and the student)
- Financial Aid documentation
- Complaints



- All private career schools are required to track their graduates' initial employment information, even if the school does not offer job placement services.
- The exception to this rule is when a school trains students to enter some licensed occupations (for example, real estate). Then, the school must track its students' passage rates on the licensing exams.

# Why track students who complete and students who become employed?

- **Because the Commission is charged with assuring that private career school programs are meeting minimum job-preparatory goals.**
  - **These data are published and made public.**
- **Schools should know (and want to know) how adequately they prepared students.**



## Private Career School Responsibilities

- Annual Report - Due October 1 each year
- Payment into the GSTF\* each year (.25% of adjusted gross tuition received but no less than \$250)

\*GSTF – *Guaranty Student Tuition Fund* ([COMAR 13B.01.01.18](#))



## Private Career School Responsibilities

- What if my school must close (involuntary)?
- What if I am considering closing my school (voluntary)?

**CONTACT US IMMEDIATELY**





# **New School Application (Format)**



# New School Application (Format)

- Submit the application materials in an organized PDF or collection of PDF's that are appropriately organized to reflect the order and sections of the application (e.g., Tab A: Background Information, Tab B: Ownership and Organization, etc.). Microsoft WORD documents are allowed as well and may be requested by staff.
- Only submit **hard copies** of the Financial Guarantee, the Application Fee, or GSTF Payment. **Please make copies of the Application Fee & GSTF Payment and submit with the New School Application.**
- Please do not send textbooks to our office.



# New School Application (Format)

## Initial Financial Requirements

- ✓ Application Fee: \$300 for up to three programs. An additional \$100 for every program over three. (*Nonrefundable*) *Due upon submission of Part I.*
- ✓ Guaranty Student Tuition Fund payment: \$2,500 (*Possibly Refundable*) *Due upon submission of Part II.*
- ✓ Having a reviewed or audited financial statement prepared by an independent CPA. (*Optional*)
- ✓ Obtaining a financial guarantee to cover the tuition liability of all enrolled students.



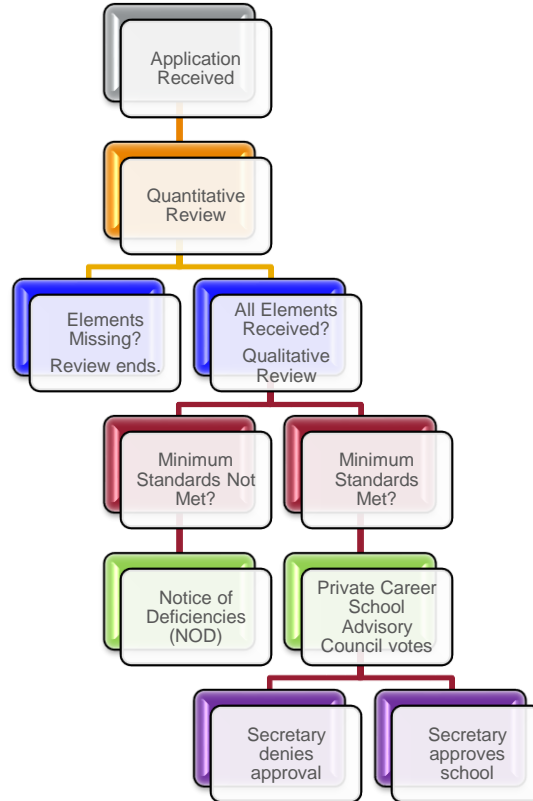
# New School Application (Format)

## Timeline (*COMAR 13B.01.01.04*)

- ✓ 1<sup>st</sup> 30 days – You’ll receive a completeness check letter. This letter identifies whether or not your application is complete.
- ✓ Before an applicant can receive approval to own and operate a private career school, the Private Career School unit **must** make a recommendation to the Secretary of Higher Education. They may vote to recommend approval or denial.
- ✓ Timeline: 6 - 12 months before the Secretary of Higher Education renders a decision on approval or denial.
- ✓ We’re implementing the “3-strike” rule. Our analysts will review your documents in their entirety up to **3 times**. If after the 3<sup>rd</sup> revision it is determined that the application does not meet minimum standards in accordance with COMAR requirements, educational standards, best practices, or MHEC policy, our staff will recommend the issuance of a Notice of Deficiencies (“NOD”). Your application will be denied.



# New Private Career School Process



# Market Demand

[COMAR 13B.01.01.05\(A\)\(1\)\(d\)](#)



# Market Demand

- What are the required data that applicants must present?
  - New school applications require:
    - (1) evidence of occupational demand with an **analysis** of local training competition, and
    - (2) employer surveys with tabulated results.
- How many positive market surveys are required?
  - 10-20 depending Department of Labor data
  - Only providing national labor statistics is insufficient. Providing **Maryland** labor statistics is required.
- How far away must you be from other private career schools that offer the same training?
  - 5 mile radius—at least
  - An applicant may provide a justification for applying in a location that violates the policy and it will be reviewed on a case-by-case basis.



# Curriculum





# Curriculum

- It is essential that all program curricula receive a great deal of careful, in-depth and detailed planning. Be sure to cross reference all documents against the provided checklists to make sure all information is addressed.
- You are required to submit the curriculum to the appropriate regulatory board for your training (Maryland State Board of Cosmetologists/Barbers, Maryland Board of Nursing, Maryland Real Estate Commission, etc.) to MHEC no later than upon submission of Part II of the Application.  
*\*Schools that intend to offer massage therapy training **must** acquire accreditation prior to applying.*
- If there is no state-sanctioned board to review the curriculum, MHEC Staff will forward the curriculum to an independent consultant for review.

For more information on licensing boards: <https://labor.maryland.gov/license/>



## Curriculum that includes:

- ✓ Textbooks (ISBN or electronic copies\*)
- ✓ Program Outline
- ✓ Syllabi
- ✓ Detailed daily lesson plans
- ✓ Hand-outs
- ✓ Assessments: Assignments, Quizzes and Exams
- ✓ School catalog
- ✓ Sample student records such as:
  - ✓ enrollment agreement
  - ✓ academic transcript
  - ✓ attendance record
  - ✓ account card
  - ✓ Certificate of achievement or diploma (as appropriate)



# **New School Application** **(Distance Education)**

- What does it mean for a program to be considered Distance Education?
  - A school offering a program in whole or in part by distance
- In order to be approved as a Distance Education program, you must receive approval to operate a private career school

**[COMAR 13B.01.01.21-.27](#)**



# New School Application (Distance Education)

- What needs to be specified for distance education programs?
  - Enrollment/registration process
  - Schedule options
  - Costs
  - Refund Policy
  - Please review and follow the checklists for the student facing documents to ensure that you are in compliance

[COMAR 13B.01.01.21-.27](#)



# New School Application (Distance Education)

- What are the regulations?
  - [COMAR 13B.01.01.21-.27](#)
  - [C-RAC 2011](#)



# Financial Guarantee

[COMAR 13B.01.01.19](#)



# Financial Guarantee

- All schools must furnish a bond or letter of credit.

The Financial Guarantee is a consumer protection for students attending Private Career Schools issued in the form of a Performance Bond or a Letter of Credit by reputable insurance companies that covers 100% tuition liabilities and fees.

- Discussion (COSTS vs. FEES)

- Total tuition liability

Total tuition liability is the total cost of tuition for all student enrollments at any given time. Tuition liability is based on your approved maximum enrollments established during approval. Maximum enrollments are based on: 1) your financial guarantee, 2) Student:Instructor (SI) ratios, 3) square footage of your facility, and 4) educational soundness.



# Financial Guarantee

- How is it calculated?

**Total Tuition & Fees (X) Total Student Enrollment At Any Given Time**

**Example 1:**

$\$100 \times 20 \text{ students (10 day + 10 evening)} = \$2,000$

*FINANCIAL  
GUARANTEE  
REQUIRED = \$2000*

**Example 2:**

$\$100 \times 20 \text{ students (Cosmetology)} = \$2,000$

$\$50 \times 10 \text{ students (Barbering)} = \$500$

$\$25 \times 4 \text{ students (Nail Technician)} = \$100$

*FINANCIAL  
GUARANTEE  
REQUIRED = \$2600*





# Facility

[COMAR 13B.01.01.16](#)



# Facility

- Location, Location, Location – what is acceptable?
  - A school shall comply with all State and local laws, ordinances, and requirements including those for fire, health, and zoning. It is the responsibility of the school to secure and document that the required State and local approvals have been granted.
  - A facility and the space provided for required instructional purposes shall be safe and sanitary and conform to standards of sound educational practice. Adequate classroom space shall be provided which is used exclusively for instruction during periods of instruction and which is conducive to learning. Space in square footage per student shall be provided in accord with sound educational practice and as required by the school's training program.

***A classroom does not constitute a school.***

# Facility

- What documents are required with the application?
  - Lease
  - Inspections
  - Permits
- Equipment - This varies from program to program.
- Site Visits must be conducted in person prior to approval
- How much space is required?
  - “18 sq. ft./ student” policy in each room utilized for instruction



# Programs

[COMAR 13B.01.01.09](#)



## Programs

- Private career schools - clock hours

vs.

Colleges and Universities - credits

- Students **must** make up missed time and work. (in most cases)
- Students are **not** allowed an unlimited amount of time to complete a program. (“80% rule”, “120% rule”)

EXAMPLE:

100 clock hour - program

80% of program - 80 clock hours

If a student misses *more* than 20 clock hours...



## Programs: Schedules

- Days each week, hours each day – all must equal the correct number of clock hours as listed in the Catalog and Enrollment Agreement.
  - EXAMPLE:  
Cosmetology Program (1500 clock hours required)  
Monday - Friday  
8:00 am - 5:00 pm  
(8 clock hours each day, 1 hour lunch break)  
40 week- program



## Programs: Schedules

- How should applicants account for small breaks or lunch breaks when calculating clock hours within a day?

30-minute lunches for shorter schedules/ 1-hour lunches/breaks for longer schedules

Breaks are not included in instructional time (clock hours)

1 clock hour = 50 minutes of instructional time per 60-minute hour

[COMAR 13B.01.01.09A\(2\)](#)

# Staffing

[COMAR 13B.01.01.07](#)  
[COMAR 13B.01.01.10](#)





# Staffing

- Adequate staffing? Substitute teachers?
  - List all the school faculty and staff including administrators, admissions representatives, and instructors.
  - For instructors, please indicate the specific programs they will be teaching.

[COMAR 13B.01.01.10](#)



# Staffing

- Staff Qualifications
  - **Instructors** must have **at least 2 years** of successful practical experience in the occupation or subject matter being taught.
  - **Instructors** must have maintained for **at least 2 years** at least the level of licensure, certification, or credential for which the program they are instructing prepares graduates.
  - **Directors** (Minimum Requirements):
    - 4 years of experience in the area in which training is offered, - or -  
completion of a standard 4-year college or technical program **and** 2 years of experience in the area
    - Must demonstrate “administrative capability”
  - **Additional staff**: must be appropriate to the size and purpose of the school. We are examining the size, organization, and quality of your staff.

[COMAR 13B.01.01.07](#) and [COMAR 13B.01.01.10](#)



# Staffing

- Staff Qualifications
  - All qualifications of the instructional staff shall be documented in their personnel files, including but not limited to evidence of formal educational attainment, certificates and degrees earned, and relevant experience.
  - You must notify MHEC when you have staffing and personnel changes.
  - You must submit a completed **personnel form** for any new hire so that we can examine the new hire's credentials and update our files.

[COMAR 13B.01.01.07](#) and [COMAR 13B.01.01.10](#)

# Catalog and Checklists

[COMAR 13B.01.01.15](#)

# Catalog and Common Errors

1. Mission statements – students will *sit for*...not “pass” exams
2. Exaggerated language about what schools offer
3. Overstating the kinds of occupations/jobs for which initial graduates will be qualified
4. Absence of an Academic Calendar / No planning done for the entire year to take into account holidays or breaks between cohorts
5. Inconsistencies with time, clock hours, SI ratios, etc.
6. Lack of Detail:
  - a. Clock hour breakdown for lecture, lab/practical, clinical
  - b. Lack of identification of faculty and administrative staff
  - c. Make-Up Policies
  - d. What happens when students demonstrate poor academic performance?
7. Lack of Clarity:
  - a. What are the admission standards? **BE CLEAR AND SPECIFIC**
  - b. “at least” language with respect to age or other requirements



# Q & A Session

\*For additional inquiries, please forward them to [pcs.mhec@maryland.gov](mailto:pcs.mhec@maryland.gov).



## Final Notes

- Applications are not accepted until 30 days after this presentation.
- If you have any questions prior to submission, please email us at [pcs.mhec@Maryland.gov](mailto:pcs.mhec@Maryland.gov) and we will respond accordingly.
- Once you submit your application, you will be assigned an analyst

