

CRITERIA	QUESTIONS
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	<p>If <i>Yes</i>, is the size of the discount based on the financial benefit that the campus receives from the payment of cash earlier than would be required under the normal tuition payment schedule?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No      <input type="checkbox"/> Not Applicable</p> <p>If <i>No</i>, insert the section number in parentheses and explain:  <div style="background-color: #cccccc; height: 15px; width: 100%;"></div> </p>
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**3-1-203. Data Integrity.** All data reported to ACICS for any purpose is expected to reflect an accurate and verifiable portrayal of institutional performance and is subject to review for integrity, accuracy, and completeness.

See also Appendix L.

**3-1-440–Student Services**

**3-1-441. Counseling and Guidance.** Each institution shall designate at least one person on staff experienced in counseling students on personal or academic problems and employment opportunities. The extent of such activity, and the personnel assigned to it, shall be determined by the size, classification, and admissions standards of the institution, the characteristics and location of students, and the means of communication with them. Orientation activities shall assist new students in adapting to the institution. The following are minimum expectations:

- (a) A system of educational, occupational, and personal advising shall be available to students and shall be provided on a periodic basis to ability-to-benefit students enrolled pursuant to Section 3-1-303(b).
- (b) Institutions shall emphasize retention and program completion for all students through activities that take into account their academic and socioeconomic characteristics.
- (c) Institutions shall provide employment assistance and document activity. An institution shall not guarantee employment or the starting salary of its graduates. Follow-up studies on graduates and employer satisfaction shall be conducted by all institutions at specific measuring points following placement of the graduate. All institutions that use placement percentages or salary projections as part of their recruiting activities shall maintain data on all graduates, including the percentage receiving jobs and the percentage receiving jobs in the career field for which they were trained. Institutions also should keep data on students who do not graduate but who become employed on their own or with the institution's assistance.

An institution is encouraged to provide placement assistance, when requested, to graduates of other ACICS-accredited institutions who are relocating to a new community.

<p>4.53</p>	<p>Was the team able to verify the retention rate for the campus and for each program as reported on the Campus Accountability Report (CAR) last submitted to the Council?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No      <input type="checkbox"/> Not Applicable</p>
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If *No*, insert “Section 3-1-203 and Appendix L” in parentheses and explain:

<p>4.54</p>	<p>Was the team able to verify the graduates reported as unavailable for placement on the campus’s most recent CAR?</p> <p><input type="checkbox"/> Yes      <input type="checkbox"/> No      <input type="checkbox"/> Not Applicable</p>
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If *No*, insert “Section 3-1-203 and Appendix L” in parentheses and explain:

<p>4.55</p>	<p>Describe the process by which students who receive financial aid are counseled concerning their student loan repayment obligations.</p> <p><input type="checkbox"/> Not Applicable (The campus does not participate in financial aid.)</p> <div style="background-color: #cccccc; height: 15px; width: 100%;"></div>
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If students do not receive counseling regarding student loan repayment obligations, insert the section number in parentheses and explain:

CRITERIA	QUESTIONS
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(d) Institutions shall document that students are counseled concerning their student loan repayment obligations.

**3-6-600 – ADMISSIONS**

**3-6-601. Enrollment Prerequisites.** The threshold admission requirement to a master’s degree program is a baccalaureate degree.

If admission to a professional program is granted without a baccalaureate degree, the burden is on the institution to demonstrate and justify that the alternate admission requirement is accepted by a recognized licensing or specialized accrediting agency and is common practice among accredited institutions of higher education. In such cases, admission may be granted only to eligible students who have completed, at a minimum, an associate’s degree or equivalent.

If the institution chooses to award a suitable baccalaureate degree upon completion of specified requirements or concurrently with the award of the professional master’s degree, the baccalaureate degree curriculum must be approved by the Council.

**3-6-602. Evaluation of Applicants.** Institutions should use appropriate techniques to evaluate applicants and to determine whether they have the academic qualifications to benefit from graduate study.

**FOR MASTER’S DEGREES ONLY**

4.56 Do all students enrolled in master’s degree programs possess a bachelor’s degree?  
 Yes       No

If *No*, describe the alternate admissions requirement that is accepted by a recognized licensing or specialized agency:  
 [REDACTED]

If there is no acceptance by a recognized agency or evidence that this is common practice, insert the section number in parentheses, list student names, and explain:  
 [REDACTED]

4.57 Describe the techniques used by the institution to evaluate applicants’ qualifications to benefit from graduate study.  
 [REDACTED]

Are these techniques appropriate?  
 Yes       No

If *No*, insert the section number in parentheses and explain:  
 [REDACTED]

**GENERAL COMMENTS:**  
 [REDACTED]

**COMMENDATIONS:**  
 [REDACTED]

**RECOMMENDATIONS:**  
 [REDACTED]

**Case Name:** *In the Matter of* Accrediting Council for Independent Colleges and Schools

**Docket No.:** 16-44-O

**Filing Party:** Respondent, Accrediting Council for Independent Colleges and Schools

**Exhibit No.:** B-O-159



December 16, 2016

ID Code 00011311(MC)

**VIA E-MAIL ONLY**

Rev. Ronnie L. Williams  
President  
Camelot College  
2618 Wooddale Boulevard, Suite A  
Baton Rouge, LA 70805

[home@camelotcollege.com](mailto:home@camelotcollege.com)

**Subject: Appeal to Council of ACICS Staff PVP Review Decisions/Rejections**

Dear Rev. Williams:

The Council has reviewed and considered the institution's appeal of the ACICS staff's decision to consider invalid the placements of Advanced Medical Assistant (AMA) graduates in phlebotomy, mental health tech, and certified nursing assistant positions; and Cosmetology graduates in Mary Kay positions, as placed by skills. While much of a curriculum argument was not provided for the Cosmetology program, according to the institution, "...the above three disciplines are major training components in our Advanced Medical Assistant program".

However, the Council's review of the AMA curriculum provided in the institution's request indicate that Phlebotomy is an 80-hour, 2 credit course; Nurse Aid Training is an 80-hour, 4-credit course; and Mental Health Tech is another 80-hour, 4-credit course. Hence, these "disciplines", independently, are not major training components of the AMA curriculum.

The Council also considered the institution's argument that during its most recent renewal of accreditation visit the ACICS review team accepted these placements as appropriate. While the Council' empathizes with the institution on the confusion that this may cause, it is important that the institution recognizes that the Council has purposefully strengthened and clarified in numerous webinars and memoranda to the field its heightened expectations on placements since that review cycle.

As a result of its thorough consideration of the institution's request, including the attestations from graduates and employers, the Council has determined that the staff's analysis and review are consistent with its expectations on the interpretation of the placement definition and the institution must submit the following to the Council:

1. The placement documentation to support all graduates classified as placed on the 2016 Campus Accountability Report (CAR) along with documents to support those classified as not available for placement.

December 16, 2016

Rev. Williams

Page 2 of 2

2. Revised publication and advertising materials, including the catalog, web site, and brochures, to accurately reflect the objectives of the Advanced Medical Assistant and Cosmetology programs, removing all references to careers in those areas identified as inappropriate – Mary Kay Consultant, Phlebotomy, Mental Health Tech, and Certified Nurse Assistant.

Further, the institution needs to address the serious disconnect between statements of concern for its students in the context of comparative high costs and length of training for enrollees in the AMA program being routed into low-level paying jobs for CNAs, by example, when shorter and cheaper options would have better served their interest relative to the outcome.

The requested information must be submitted to the Council's office via [car@acics.org](mailto:car@acics.org) no later than **February 28, 2017**. Failure to submit the information as requested may result in an adverse action against the institution. If you have any questions, please contact me at [pwgilliam@acics.org](mailto:pwgilliam@acics.org).

Sincerely,

(b)(6)

Perlter Walters-Gilliam  
Vice President – Accreditation

- c: Mr. Roger J. Williams, Interim President ([rjwilliams@acics.org](mailto:rjwilliams@acics.org))  
Dr. Terron King, Senior Manager, Institutional and Program Review ([tking@acics.org](mailto:tking@acics.org))

**From:** Perliter Walters-Gilliam  
**To:** "(b)(6) @aol.com"  
**Cc:** Roger J Williams  
**Subject:** RE: PVP (Camelot College-00011311)  
**Date:** Wednesday, October 19, 2016 3:18:00 PM

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Dear Pastor Williams:

This is to follow up on our telephone call on Monday concerning your response to Mr. Williams, relative to the placement of CNAs and Mental Health Techs from the Advanced Medical Assistant (AMA) program. To ensure that we are clear, it is necessary that I reiterate ACICS' position. We do not consider these placements to be appropriate, and the campus has been invited to submit, for the Council's consideration, documentation to support its position that these placements justify the \$13, 897.81 investment in the AMA program. However, the monthly PVP submissions will be validated from ACICS' position. Please email these materials Mr. William's attention and we will process them accordingly. Thank you.

Ms. Perliter Walters-Gilliam

Associate Vice President - Accreditation

Accrediting Council for Independent Colleges and Schools

750 First Street, NE | Suite 980 | Washington, DC 20002

[www.acics.org](http://www.acics.org) | 202.336.6769 - p | 202.421.5935 - c

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**From:** "(b)(6) @aol.com" <(b)(6) @aol.com>  
**Date:** Sunday, October 16, 2016 at 4:19 PM  
**To:** Roger J Williams <[rjwilliams@acics.org](mailto:rjwilliams@acics.org)>  
**Subject:** Fwd: PVP (Camelot College-00011311)

Mr. Roger Williams,

Thank you for your guidance in your October 12, 2016, letter. I sincerely apologize for giving the perception that we were resisting the guidance of the organization [ACICS] that initially gave us the opportunity twenty-six years ago to help thousands of graduates to have successful career jobs. Please know that we would never resist the guidance of our Accrediting Commission and we are fully aware of the pending ACICS Petition for Re-recognition with the Department of Education. My letter to [REDACTED] was only intended to inform our Commission that some of our graduates who were classified as CNA's are performing Medical Assistant tasks such as Computerized Patient Charting, Initial Patient Assessments, Vital Sign Checks and other Medical Assistant tasks also on their jobs

as we identified in our recent survey. **We inadvertently classified them by Title Match in the PVP system instead of placing them by Skills Match.** I am referring to the guidance we received in the Placement Verification Program Guidelines on ACICS website. Respectfully, we know that students who graduated from a six week or short term CNA school could not perform the Medical Assistant skills that our graduates perform. Again, respectfully, this is the reason why The Baton Rouge General approached Camelot with the concept of adding more skill sets to the Medical Assistant program in an effort to hire more qualified health care professionals. These skills can be validated by speaking with our graduates or their employers. Also, I would love to have an opportunity to speak with you more on this issue and to speak with you on our outreach efforts to our Louisiana Congressional Delegation with regards to the pending decision by the Secretary of Education. Please call me at 225-907-3310 or give a time that you could be available for me to call you.

Again respectfully,

Pastor Ronnie L. Williams

**From:** [PVP review](#)  
**To:** [ccopt@hunterbusinessschool.edu](mailto:ccopt@hunterbusinessschool.edu)  
**Cc:** [PVP review](#); [Perlter Walters-Gilliam](#); [Roger J Williams](#)  
**Subject:** RE: PVP Submission Concerns  
**Date:** Thursday, February 16, 2017 4:45:18 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Dear Mr. Copt,

The PVP review committee as well as an additional subject specialist reviewed the information that you submitted regarding the PVP submissions for the Medical Office Administration and Medical Assistant programs. Upon review the committee has determined the following:

The Medical Office Administration placements are suitable placements based on the skills presented. Based on the curriculum reviewed, predominant skills from the program are utilized in the positions. However, please be advised that the question of the appropriateness of the CIP code remains and will be addressed in the renewal of accreditation review at the Council's April meeting.

For the phlebotomy placement of the medical assistant graduates, the committee affirms the staff decision regarding the phlebotomy placements as invalid. Although graduates in such placements may be using some skills from various courses, the assessment is that the placement does not require the use of predominant skills from the program as a whole. Secondly, while employers may prefer graduates of a medical assisting program due to the additional skills they attain, these additional skills, for which the graduate invested extra resources to obtain, may be utilized in positions that more closely align with the training received.

Regards,

(b)(6)

Manager, Institutional Compliance  
Accrediting Council for Independent Colleges and Schools

---

**From:** Perlter Walters-Gilliam  
**Sent:** Thursday, January 26, 2017 9:25 AM  
**To:** chuck copt  
**Cc:** Karly Zeigler; Corrisa Barker; Roger J Williams  
**Subject:** RE: PVP Submission Concerns

Good morning Mr. Copt

Thank you for your detailed response. The PVP Review Team will meet to discuss and I will follow up at my earliest opportunity.

Ms. Perlter Walters-Gilliam  
Vice President - Accreditation  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.336.6769 - p |

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**From:** chuck copt [<mailto:ccopt@hunterbusinessschool.edu>]  
**Sent:** Wednesday, January 25, 2017 5:21 PM  
**To:** Perliter Walters-Gilliam  
**Subject:** FW: PVP Submission Concerns

Dear Ms. Walters-Gilliam:

As indicated in my previous email, I received the letter that you submitted to [REDACTED] on January 13, 2017 concerning the "PVP" criteria. Your response left our management team with several questions and concerns that we would like to address.

#### **General Office Placement for Graduates from the Medical Office Administration program:**

In your response you indicate that we should change the program description in our catalog, on our website, and any other publication to no longer make reference to the "business environment". If we remove the wording "business environment" from the program description found in our catalog and published on our website and replace it with the wording "general office skills", will this then meet the criteria that ACICS uses thereby allowing our institution to place students in a "general office" setting outside of the health care field providing the student is utilizing a predominant number of skills that were acquired in the courses that focus on "general office" skills? Please advise.

#### **Placements Pertaining to Phlebotomy:**

We were initially waiting for a letter from LabCorp which is a national laboratory testing company. The letter was to support the need for trained Medical Assistants from Hunter as a requirement to work as a phlebotomist. We have been waiting for the Regional Field Supervisor to forward the letter to their Corporate Human Resources department for approval before sending it on to Hunter Business School. We decided to submit the following supportive information and then forward the letter from [REDACTED] Regional Supervisor, LabCorp in a separate email.

As you point out, there must be predominant use of skills from the program in the position to make it a valid placement, however in your letter you consider Phlebotomy one skill learned as part of the larger set of skills obtained from the program. Our students are only placed as phlebotomists at two National Laboratories who typically only hire employees with more than 1 year of work experience. In their job postings LabCorp advertises for PST Patient Services Technician (*see attached posting*) and Quest Diagnostics uses the title Phlebotomy Services Rep I (*see attached posting*). We used the job title phlebotomist as an easy way to identify the type of work the students do. Would it help if we change the titles that we have been using for these two organizations to match the title in the job postings? Both LabCorp and Quest Diagnostics make an exception for our students because of their education and training at our institution, in which our Medical Assistant program has programmatic accreditation by the Commission on Accreditation of Allied Health Education Programs since 2013 (*letter from LabCorp to follow in a separate email*).

In your letter you stated that phlebotomy is covered in two courses along with Laboratory Procedures (120) hours. This is 120 hours in a 910-hour program which represents 13% of the program. It is our assertion that the phlebotomy placements that we state as placements are skills-based and utilize 73% of the total curriculum. If you look at the job description found below from Quest Diagnostics, 667 hours out of the 910 hours offered in our Medical Assistant program are actually utilized within the job description. They

require students to utilize skills that have been taught within the following courses:

- MA101A: Asepsis & Assisting with Minor Surgery (27) hrs
- MA102: Communication & Human Relations (60) hrs
- MA201 Urinalysis & Microbiology (60) hrs
- MA202: Keyboarding with Microsoft Word (60) hrs
- MA301 Phlebotomy & Laboratory Procedures I (60) hrs
- MA401: Phlebotomy & Laboratory Procedures II (60) hrs
- MA501: Clinical skills (60) hrs
- MA502: Medical Administrative & Business Practices (60) hrs
- MA602 Computerized Medical Billing & EMR (60) hrs
- MA801: Externship (160) hrs

Below is the job description from Quest Laboratories that we've used in determining that our placements meet the skills-based requirements set forth by ACICS, which is: "Any graduate or completer of a program that was placed based upon the required use of skills learned in the student's program as a predominant component of the job. These skills must be those listed in the institution's published program description and a majority of these skills must be documented in the employer's job description as required or desired skills, duties or responsibilities".

<b>Quest Diagnostics Job Description Job Title:</b>	Phlebotomy Services Rep I	<b>Job Family:</b>	Laboratory
<b>Reports To:</b>	Field Operations Manager	<b>Grade</b>	

**Basic Purpose:**

Under the direction of the area supervisor, perform daily activities of the Patient Service Center /Mobile/In-office Phlebotomy accurately and on time. Maintain a safe and professional environment. Performs with confidence, both the forensic and clinical specimen collection and processing duties following established practices and procedures. Maintains required records and documentation. Demonstrates organizational commitment and promotes a positive image to patients, clients, employees and the public in general.

**Duties and Responsibilities:**

- 1 Greet customers appropriately. Treat all customers in a courteous manner
- 2 Ensures all field phlebotomy and PSC specimens are collected accurately and on time.
  - a. Collects specimens according to established procedures.
  - b. Responsible for completing requisitions accurately.
  - c. Call clients to confirm handwritten orders, verify test(s) ordered, obtain accurate billing information, i.e. Diagnosis codes, UPIN information, etc.
  - d. Research test/client information utilizing lab computer system or Directory of Service.
  - e. Label, centrifuge, split, and freeze specimens as required by test order.
  - f. Package specimens for transport.
  - g. Administers glucose, lactose and d-xylose oral solutions according to established training.
- 3 Maintains required records and documentation.
  - a. Reads, understands and complies with departmental policies, protocols and procedures: (i.e. Procedure Manuals, Safety Manual, Compliance Manual, Automobile policies and procedures, Employee Handbook, Quality Assurance Manual).
  - b. Maintains all appropriate PSC/Phlebotomy logs.
  - c. Assist with compilation of monthly statistics and data. Submits data on time monthly.
  - d. Perform basic clerical duties, i.e. filing, faxing, preparing mail. Will be required to perform electronic data entry.
  - e. Submits accurate time and travel logs as directed by management and on time.
  - f. Submits accurate expense forms, if applicable, on the required day.
- 4 Demonstrates organizational commitment.

- a. Adheres to departmental and company code of grooming and dress code and lab coat policies, appearing neat and clean at all times.
  - b. Reports on time to work, following attendance guidelines.
  - c. Answers the telephone in a friendly and helpful manner, by incorporating the company name, self-identification and a helpful statement
  - d. Communicates appropriately with clients, patients, coworkers and the general public.
  - e. Communicates all unresolved problems immediately to the appropriate Manager, Supervisor, Group Leader or PSR II for resolution. Remains polite and courteous at all time.
- 5 Miscellaneous duties and responsibilities.
- a. Keeps work area neat and clean. Disposes of biohazard containers when scheduled.
  - b. Help with inventories and other tasks as assigned.
  - c. Stock supplies as needed.
  - d. Performs other department-related clerical duties when assigned.
  - e. Answers phone and dispatch calls when assigned.
  - f. Participates on teams and special projects when asked.

**Qualifications:**

Education Preferred:	BS with DMLT/B.Sc (MLT)
Work Experience:	1 year phlebotomy experience. Customer service in a service environment.
Other:	Must be flexible and available based on staffing requirements: weekends, holidays, on call and overtime. Excellent phlebotomy skills to include pediatric and geriatric. Demonstrates good organization, communication, and interpersonal skills, is able to manage concerns of patients and employees in a professional manner. Capable of handling multiple priorities in a high volume setting Ability to perform data-entry .

Additionally, we encourage our students to certify themselves through the American Medical Technologists as a Registered Medical Assistant which is one of the leading certifying organizations for Medical Assistants. This exam, encompasses Medical Assisting, EKG Technician and Phlebotomist. If they want to be certified only in Phlebotomy (especially after obtaining a job offer from Quest), below is the content of the American Medical Technologists Phlebotomy Exam.

**AMT Registered Phlebotomy Technician (RPT)  
Certification Examination Construction Parameters**

Number of items in category

Category, Sub-category, and Competency

**I. Obtaining Blood Samples (41.5% of test)**

- A. Identify correct patient properly
- B. Select appropriate containers for specimens and know requirements for container identification
- C. Know physiological aspects of blood collection
- D. Prepare patient for various tests
- E. Select proper venipuncture site
- F. Perform venipunctures
- G. Collect specimen in proper tube-draw sequence
- H. Perform skin punctures
- I. Perform heel punctures on infants
- J. Provide proper post care of venous, arterial, & skin puncture sites
- K. Handle blood samples to maintain specimen integrity

L. Label transfusion services (blood bank) specimens according to proper Protocol

*Hunter's Courses in which above is learned:*

- a. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- b. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- c. *MA:801 Externship (160 hrs)*

## **II. Specimen Collection and Processing (15.5% of test)**

- A. Properly handle non-blood specimens to maintain their integrity
- B. Properly collect and handle specimens with time/temperature requirements
- C. Properly collect and handle specimens for blood cultures
- D. Select proper station for specimen delivery
- E. Process specimens for shipping
- F. Instruct patient in the collection of urine specimens
- G. Instruct patient in the collection of other specimens
- H. Collect and process point-of-care testing (POCT) specimens

*Hunter's courses in which the above is learned*

- a. *MA:201 Urinalysis and Microbiology (60 hrs)*
- b. *MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)*
- c. *MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)*
- d. *MA:801 Externship (160 hrs)*

## **III. Time Management and Assignment Organization (8.0% of test)**

- A. Read physician orders and requisitions
- B. Set priorities for specimen collection
- C. Schedule time intervals for tolerance tests
- D. Schedule time intervals for drug-dependent tests
- E. Refer problems to supervisor appropriately
- F. Cooperate with co-workers in the completion of assignments

*Hunter's Courses in which the above is learned*

- a. *MA:502 Medical Administrative and Business Practices (60 hrs)*
- b. *MA: 102 Communication and Human Relations (60 hrs)*
- c. *MA:101B Pharmacology\_(33 hrs)*
- d. *MA:801 Externship (160 hrs)*

## **IV. Professional Communications (4.5% of test)**

- A. Develop and use proper and professional communication skills with staff, patients, and families
- B. Use proper technique and etiquette for answering the telephone
- C. Inform patients of special test requirements

*Hunter's courses in which the above is learned*

- a. *MA: 102 Communication and Human Relations (60 hrs)*
- b. *MA:801 Externship (160 hrs)*

## **V. Clerical Skills and Duties (5.5% of test)**

- A. Chart or file laboratory-generated reports properly
- B. Enter, retrieve, and verify patient collection data and special notations using appropriate sources
- C. Maintain inventory levels, order and restock supplies
- D. Employ computer skills

*Hunter's courses in which the above is learned*

- a. *MA:202 Keyboarding with Microsoft Word (60 hrs)*
- b. *MA:602 Computerized Billing*
- c. *MA:102 Communication and Human Relations (60 hrs)*
- d. *MA:801 Externship (160 hrs)*

**VI. Safety Standards and Procedures (10.0% of test)**

- A. Identify appropriate regulatory and standard-setting agencies
- B. Know the use of material safety data sheets
- C. Employ Universal/Standard precautions
- D. Employ infection control and isolation techniques
- E. Recognize patient problems related to syncope, nausea, and other complications

*Hunter's courses in which the above is learned*

- a. MA:102 Communication and Human Relations (60 hrs)
- b. MA:101A Asepsis (27 hrs)
- c. MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)
- d. MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)
- e. MA:801 Externship (160 hrs)

**VII. Legal, Ethical, and Professional Considerations (6.0% of test)**

- A. Know principles of liability regarding the practice of phlebotomy
- B. Perform duties professionally, ethically, and legally, adhering to criminal justice and civil rights acts
- C. Employ professional conduct and appearance in the performance of duties

*Hunter's courses in which the above is learned*

- a. MA:102 Communication and Human Relations (60 hrs)
- b. MA:801 Externship (160hrs)

**VIII. Terminology, Anatomy, and Physiology (9.0% of test)**

- A. Employ basic terminology including suffixes, prefixes, and root words
- B. Know basic anatomy
- C. Know basic physiological systems

*Hunter's courses in which the above are learned*

- a. MA:302 A&P I with Medical Terminology (60 hrs)
- b. MA:402 A&P II with Medical Terminology (60 hrs)
- c. MA:801 Externship (160 hrs)

As you can see, even if you do not include the externship, our students must learn 65.9% of the total Medical Assistant Program in order to pass the AMT Phlebotomy Exam.

We are looking to resolve these issues as quickly as possible so that we may continue to support our students in finding them employment that meets their career aspirations and the criteria set forth by ACICS. Thank you in advance for you time, we look forward to your response.

Sincerely,

(b)(6)

Chuck Copt

Director of Education & Evening School Director



**Hunter Business School**

Brookhaven Executive Center

3247 Route 112 Bldg. 3

Medford, NY 11763

(631) 736-7360 Ext. (b)(6)

[www.hunterbusinessschool.edu](http://www.hunterbusinessschool.edu)



**From:** Perliter Walters-Gilliam  
**To:** [Ms. Tibby Loveman](#)  
**Cc:** [Roger J Williams](#); [PVP review](#)  
**Subject:** FW: PVP Submission Concerns  
**Date:** Tuesday, February 07, 2017 1:44:00 PM  
**Attachments:** [PST Specialist - Flushing Queens - NY at LABORATORY CORP OF AMERICA HOLDINGS.pdf](#)  
[Quest phlebotomy job description.pdf](#)  
[RPT Content Outline detail.pdf](#)  
[image002.png](#)  
[image003.png](#)

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Campus response below...

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**From:** chuck copt [mailto:[ccopt@hunterbusinessschool.edu](mailto:ccopt@hunterbusinessschool.edu)]  
**Sent:** Wednesday, January 25, 2017 5:21 PM  
**To:** Perliter Walters-Gilliam  
**Subject:** FW: PVP Submission Concerns

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**Placements Pertaining to Phlebotomy:**

We were initially waiting for a letter from LabCorp which is a national laboratory testing company. The letter was to support the need for trained Medical Assistants from Hunter as a requirement to work as a phlebotomist. We have been waiting for the Regional Field Supervisor to forward the letter to their Corporate Human Resources department for approval before sending it on to Hunter Business School. We decided to submit the following supportive information and then forward the letter from [REDACTED] Regional Supervisor, LabCorp in a separate email.

As you point out, there must be predominant use of skills from the program in the position to make it a valid placement, however in your letter you consider Phlebotomy one skill learned as part of the larger set of skills obtained from the program. Our students are only placed as phlebotomists at two National Laboratories who typically only hire employees with more than 1 year of work experience. In their job postings LabCorp advertises for PST Patient Services Technician (*see attached posting*) and Quest Diagnostics uses the title Phlebotomy Services Rep I (*see attached posting*). We used the job title phlebotomist as an easy way to identify the type of work the students do. Would it help if we change the titles that we have been using for these two organizations to match the title in the job postings? Both LabCorp and Quest Diagnostics make an exception for our students because of their education and training at our institution, in which our Medical Assistant program has programmatic accreditation by the Commission on Accreditation of Allied Health Education Programs since 2013 (*letter from LabCorp to follow in a separate email*).

In your letter you stated that phlebotomy is covered in two courses along with Laboratory Procedures

(120) hours. This is 120 hours in a 910-hour program which represents 13% of the program. It is our assertion that the phlebotomy placements that we state as placements are skills-based and utilize 73% of the total curriculum. If you look at the job description found below from Quest Diagnostics, 667 hours out of the 910 hours offered in our Medical Assistant program are actually utilized within the job description. They require students to utilize skills that have been taught within the following courses:

- MA101A: Asepsis & Assisting with Minor Surgery (27) hrs
- MA102: Communication & Human Relations (60) hrs
- MA201 Urinalysis & Microbiology (60) hrs
- MA202: Keyboarding with Microsoft Word (60) hrs
- MA301 Phlebotomy & Laboratory Procedures I (60) hrs
- MA401: Phlebotomy & Laboratory Procedures II (60) hrs
- MA501: Clinical skills (60) hrs
- MA502: Medical Administrative & Business Practices (60) hrs
- MA602 Computerized Medical Billing & EMR (60) hrs
- MA801: Externship (160) hrs

Below is the job description from Quest Laboratories that we've used in determining that our placements meet the skills-based requirements set forth by ACICS, which is: "Any graduate or completer of a program that was placed based upon the required use of skills learned in the student's program as a predominant component of the job. These skills must be those listed in the institution's published program description and a majority of these skills must be documented in the employer's job description as required or desired skills, duties or responsibilities".

<b>Quest Diagnostics Job Description Job Title:</b>	Phlebotomy Services Rep I	<b>Job Family:</b>	Laboratory
<b>Reports To:</b>	Field Operations Manager	<b>Grade</b>	

**Basic Purpose:**

Under the direction of the area supervisor, perform daily activities of the Patient Service Center /Mobile/In-office Phlebotomy accurately and on time. Maintain a safe and professional environment. Performs with confidence, both the forensic and clinical specimen collection and processing duties following established practices and procedures. Maintains required records and documentation. Demonstrates organizational commitment and promotes a positive image to patients, clients, employees and the public in general.

**Duties and Responsibilities:**

- 1 Greet customers appropriately. Treat all customers in a courteous manner
- 2 Ensures all field phlebotomy and PSC specimens are collected accurately and on time.
  - a. Collects specimens according to established procedures.
  - b. Responsible for completing requisitions accurately.
  - c. Call clients to confirm handwritten orders, verify test(s) ordered, obtain accurate billing information, i.e. Diagnosis codes, UPIN information, etc.
  - d. Research test/client information utilizing lab computer system or Directory of Service.
  - e. Label, centrifuge, split, and freeze specimens as required by test order.
  - f. Package specimens for transport.
  - g. Administers glucose, lactose and d-xylose oral solutions according to established training.
- 3 Maintains required records and documentation.
  - a. Reads, understands and complies with departmental policies, protocols and procedures: (i.e. Procedure Manuals, Safety Manual, Compliance Manual, Automobile policies and procedures, Employee Handbook, Quality Assurance Manual).
  - b. Maintains all appropriate PSC/Phlebotomy logs.
  - c. Assist with compilation of monthly statistics and data. Submits data on time monthly.

- d. Perform basic clerical duties, i.e. filing, faxing, preparing mail. Will be required to perform electronic data entry.
- c. Submits accurate time and travel logs as directed by management and on time.
- f. Submits accurate expense forms, if applicable, on the required day.
- 4 Demonstrates organizational commitment.
  - a. Adheres to departmental and company code of grooming and dress code and lab coat policies, appearing neat and clean at all times.
  - b. Reports on time to work, following attendance guidelines.
  - c. Answers the telephone in a friendly and helpful manner, by incorporating the company name, self-identification and a helpful statement
  - d. Communicates appropriately with clients, patients, coworkers and the general public.
  - e. Communicates all unresolved problems immediately to the appropriate Manager, Supervisor, Group Leader or PSR II for resolution. Remains polite and courteous at all time.
- 5 Miscellaneous duties and responsibilities.
  - a. Keeps work area neat and clean. Disposes of biohazard containers when scheduled.
  - b. Help with inventories and other tasks as assigned.
  - c. Stock supplies as needed.
  - d. Performs other department-related clerical duties when assigned.
  - e. Answers phone and dispatch calls when assigned.
  - f. Participates on teams and special projects when asked.

**Qualifications:**

Education Preferred:	BS with DMLT/B.Sc (MLT)
Work Experience:	1 year phlebotomy experience. Customer service in a service environment.
Other:	Must be flexible and available based on staffing requirements: weekends, holidays, on call and overtime. Excellent phlebotomy skills to include pediatric and geriatric. Demonstrates good organization, communication, and interpersonal skills, is able to manage concerns of patients and employees in a professional manner. Capable of handling multiple priorities in a high volume setting Ability to perform data-entry.

Additionally, we encourage our students to certify themselves through the American Medical Technologists as a Registered Medical Assistant which is one of the leading certifying organizations for Medical Assistants. This exam, encompasses Medical Assisting, EKG Technician and Phlebotomist. If they want to be certified only in Phlebotomy (especially after obtaining a job offer from Quest), below is the content of the American Medical Technologists Phlebotomy Exam.

**AMT Registered Phlebotomy Technician (RPT)  
Certification Examination Construction Parameters**

Number of items in category

Category, Sub-category, and Competency

**I. Obtaining Blood Samples (41.5% of test)**

- A. Identify correct patient properly
- B. Select appropriate containers for specimens and know requirements for container identification
- C. Know physiological aspects of blood collection
- D. Prepare patient for various tests
- E. Select proper venipuncture site

- F. Perform venipunctures
- G. Collect specimen in proper tube-draw sequence
- H. Perform skin punctures
- I. Perform heel punctures on infants
- J. Provide proper post care of venous, arterial, & skin puncture sites
- K. Handle blood samples to maintain specimen integrity
- L. Label transfusion services (blood bank) specimens according to proper Protocol

*Hunter's Courses in which above is learned:*

- a. MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)
- b. MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)
- c. MA:801 Externship (160 hrs)

## **II. Specimen Collection and Processing (15.5% of test)**

- A. Properly handle non-blood specimens to maintain their integrity
- B. Properly collect and handle specimens with time/temperature requirements
- C. Properly collect and handle specimens for blood cultures
- D. Select proper station for specimen delivery
- E. Process specimens for shipping
- F. Instruct patient in the collection of urine specimens
- G. Instruct patient in the collection of other specimens
- H. Collect and process point-of-care testing (POCT) specimens

*Hunter's courses in which the above is learned*

- a. MA:201 Urinalysis and Microbiology (60 hrs)
- b. MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)
- c. MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)
- d. MA:801 Externship (160 hrs)

## **III. Time Management and Assignment Organization (8.0% of test)**

- A. Read physician orders and requisitions
- B. Set priorities for specimen collection
- C. Schedule time intervals for tolerance tests
- D. Schedule time intervals for drug-dependent tests
- E. Refer problems to supervisor appropriately
- F. Cooperate with co-workers in the completion of assignments

*Hunter's Courses in which the above is learned*

- a. MA:502 Medical Administrative and Business Practices (60 hrs)
- b. MA: 102 Communication and Human Relations (60 hrs)
- c. MA:101B Pharmacology (33 hrs)
- d. MA:801 Externship (160 hrs)

## **IV. Professional Communications (4.5% of test)**

- A. Develop and use proper and professional communication skills with staff, patients, and families
- B. Use proper technique and etiquette for answering the telephone
- C. Inform patients of special test requirements

*Hunter's courses in which the above is learned*

- a. MA: 102 Communication and Human Relations (60 hrs)
- b. MA:801 Externship (160 hrs)

## **V. Clerical Skills and Duties (5.5% of test)**

- A. Chart or file laboratory-generated reports properly
- B. Enter, retrieve, and verify patient collection data and special notations using appropriate sources
- C. Maintain inventory levels, order and restock supplies
- D. Employ computer skills

*Hunter's courses in which the above is learned*

- a. MA:202 Keyboarding with Microsoft Word (60 hrs)
- b. MA:602 Computerized Billing
- c. MA:102 Communication and Human Relations (60 hrs)
- d. MA:801 Externship (160 hrs)

**VI. Safety Standards and Procedures (10.0% of test)**

- A. Identify appropriate regulatory and standard-setting agencies
- B. Know the use of material safety data sheets
- C. Employ Universal/Standard precautions
- D. Employ infection control and isolation techniques
- E. Recognize patient problems related to syncope, nausea, and other complications

*Hunter's courses in which the above is learned*

- a. MA:102 Communication and Human Relations (60 hrs)
- b. MA:101A Asepsis (27 hrs)
- c. MA:301 Phlebotomy and Laboratory Procedures I (60 hrs)
- d. MA:401 Phlebotomy and Laboratory Procedures II (60 hrs)
- e. MA:801 Externship (160 hrs)

**VII. Legal, Ethical, and Professional Considerations (6.0% of test)**

- A. Know principles of liability regarding the practice of phlebotomy
- B. Perform duties professionally, ethically, and legally, adhering to criminal justice and civil rights acts
- C. Employ professional conduct and appearance in the performance of duties

*Hunter's courses in which the above is learned*

- a. MA:102 Communication and Human Relations (60 hrs)
- b. MA:801 Externship (160hrs)

**VIII. Terminology, Anatomy, and Physiology (9.0% of test)**

- A. Employ basic terminology including suffixes, prefixes, and root words
- B. Know basic anatomy
- C. Know basic physiological systems

*Hunter's courses in which the above are learned*

- a. MA:302 A&P I with Medical Terminology (60 hrs)
- b. MA:402 A&P II with Medical Terminology (60 hrs)
- c. MA:801 Externship (160 hrs)

As you can see, even if you do not include the externship, our students must learn 65.9% of the total Medical Assistant Program in order to pass the AMT Phlebotomy Exam.

We are looking to resolve these issues as quickly as possible so that we may continue to support our students in finding them employment that meets their career aspirations and the criteria set forth by ACICS. Thank you in advance for you time, we look forward to your response.

Sincerely,

(b)(6)

Chuck Copt

Director of Education & Evening School Director



Hunter Business School

Brookhaven Executive Center  
3247 Route 112 Bldg. 3  
Medford, NY 11763  
(631) 736-7360 Ext. (b)(6)  
[www.hunterbusinessschool.edu](http://www.hunterbusinessschool.edu)



**From:** Perliter Walters-Gilliam  
**To:** "jnyx@hunterbusinessschool.edu"  
**Cc:** Roger J Williams; LaToya Boyd; Karly Zeigler; Corrisa Barker  
**Subject:** PVP Submission Concerns  
**Date:** Friday, January 13, 2017 9:55:00 AM  
**Importance:** High

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Dear Ms. Nyx:

Latoya shared your email below for my review and follow up concerning placements deemed invalid for Medical Assistants graduates in Phlebotomists positions. Consistent with guidance previously provided, this is considered to be invalid and all previously accepted submissions will be revised. The rationale is as follows:

Phlebotomy is one skill learned as part of the larger set of skills obtained from the program. Per our requirement, there must be predominant use of skills from the program in the position to make it a valid placement. According to the program outline on page 14 of the 2016/2017 catalog, Phlebotomy is covered in two courses along with Laboratory Procedures (120 hours). This is 120 hours in a 910-hour program (13%).

I have also reviewed the general office placements for graduates from the Medical Office Administration program. While a predominant number of courses in the program (11/16 = 68.75%) are focused on general office, thereby justifying these classifications, the reference to "business environments" in the position description is inappropriate given that the CIP code description of the Medical Office Administration (51.0710) reads as follows:

A program that prepares individuals, under the supervision of office managers and other professionals, to perform routine administrative duties **in a medical, clinical, or health care facility/system office environment**. Includes instruction in general office skills, data processing, office equipment operation, principles of medical record-keeping and business regulations, medical/clinical office procedures, and communications skills. A program that prepares individuals, under the supervision of office managers and other professionals, to perform routine administrative duties in a medical, clinical, or health care facility/system office environment. Includes instruction in general office skills, data processing, office equipment operation, principles of medical record-keeping and business regulations, medical/clinical office procedures, and communications skills.

(<https://nces.ed.gov/ipeds/cipcode/cipdetail.aspx?y=55&cip=51.0710>)

**Hence, the institution is advised that the program description, in its catalog, web site, and any other publication must be revised to no longer make reference to the business environment, or it should revise the program description along with the CIP Code designation accordingly. I note that the institution recently hosted the onsite evaluation team which had serious concerns in this regard, with serious resistance by the campus. Hence, the institution is advised that it may respond to this assessment as part of its response to the Council's deferred Renewal of Accreditation action for the Council's consideration at its April 2017 meeting.**

Please advise if the changes will be made or if the institution will respond to Council in appeal.

Ms. Perliter Walters-Gilliam  
Vice President - Accreditation  
Accrediting Council for Independent Colleges and Schools  
750 First Street, NE | Suite 980 | Washington, DC 20002  
[www.acics.org](http://www.acics.org) | 202.336.6769 - p |

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**From:** Jennifer Nyx <[jnyx@hunterbusinessschool.edu](mailto:jnyx@hunterbusinessschool.edu)>  
**Sent:** Thursday, January 12, 2017 4:26:59 PM  
**To:** LaToya Boyd  
**Subject:** RE: Hello LaToya

Hello LaToya~



[www.hunterbusinessschool.edu](http://www.hunterbusinessschool.edu)

3247 Route 112, Building 3

Medford, NY 11763

631-569-7707 - Tel

631-736-7310 - Fax



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**From:** LaToya Boyd [mailto:[LBoyd@acics.org](mailto:LBoyd@acics.org)]

**Sent:** Thursday, January 12, 2017 8:05 AM

**To:** Jennifer Nyx

**Subject:** RE: Hello LaToya

Hello Jennifer and Happy New Year to you too!

What type of question do you have? Is it an IT question or is it about your placement verification?

Regards,

LaToya Boyd, MNML

Accreditation Coordinator

**Accrediting Council for Independent Colleges and Schools**

750 First Street, NE | Suite 980 | Washington, DC 20002

[www.acics.org](http://www.acics.org) | 202.336.6777 - p

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**From:** Jennifer Nyx [mailto:[jnyx@hunterbusinessschool.edu](mailto:jnyx@hunterbusinessschool.edu)]

**Sent:** Wednesday, January 11, 2017 6:57 PM

**To:** LaToya Boyd

**Subject:** Hello LaToya

Hello LaToya~

Happy New Year!

I was hoping that you could steer me in the right direction.

Who would I contact about the PVP as I have a few questions.

Thank you. ☺

A handwritten signature in cursive script that reads "Jennifer Nyx".

**Director Of Career Services**

**Hunter Business School**

[www.hunterbusinessschool.edu](http://www.hunterbusinessschool.edu)

3247 Route 112, Building 3

Medford, NY 11763

631-569-7707 - Tel

631-736-7310 - Fax

