

DC



July 16, 2013

Philippe Ray  
National Personal Training Institute of Colorado  
1658 Cole Boulevard, Suite 50  
Lakewood, CO 80401-3304

Certified Mail  
Returned Receipt Requested  
# 7008 1300 0002 4224 3413

RE: **Final Program Review Determination -**  
OPE ID: 04185400  
PRCN: 201310828169

Dear Mr. Philippe Ray,

The U.S. Department of Education's (Department's) Chicago/Denver School Participation Division issued a program review report on March 1, 2013 covering National Personal Training Institute of Colorado (NPTI) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs), specific to Gainful Employment Disclosure. The institution's final response was received on April 25, 2013.

The School Participation Team - Chicago/Denver School Participation Division has reviewed NPTI's response to the Program Review Report. A copy of NPTI's program review report response is attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by NPTI upon request. Additionally, this Final Program Review Determination (FPRD), related attachments, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after this FPRD is issued.

NPTI's response has resolved the finding. In addition, NPTI has provided assurances that the appropriate corrective actions have been taken to resolve and prevent future occurrences of all findings. Therefore, NPTI may consider the program review closed with no further action required.

Program records relating to the period covered by this program review must be retained until the later of: the resolution of the loan(s), claim(s) or expenditure(s) questioned in the program review [34 C.F.R. § 668.24(e)(3)(i)] or the end of the retention period applicable to the record [34 C.F.R. § 668.24(e)(1) and (e)(2)].

National Personal Training Institute of Colorado  
OPE ID 04185400  
PRCN 201310828169  
Page 2 of 2

If you have any questions please call Shelina Everett at (303) 844-4128.

Sincerely,

(b)(6)

Douglas A. Parrott  
Director  
Chicago/Denver School Participation Team

Enclosure: Program Review Report  
NPTI's Response to the Program Review Report

cc: Jill VonFeldt, Financial Aid Administrator  
Colorado Division of Private Occupational School, Department of Higher Education  
North Central Association Commission on Accreditation and School Improvement

Final Program Review Determination  
PRCN #: 201310828169

Appendix A  
Program Review Report



March 1, 2013

Philippe Ray  
National Personal Training Institute of Colorado  
1658 Cole Boulevard, Suite 50  
Lakewood, CO 80401-3304

Certified Mail  
Returned Receipt Requested  
# 7008 1300 0002 4224 3277

RE: **Program Review Report**  
OPE ID: 04185400  
PRCN: 201310828169

Dear Mr. Philippe Ray,

From December 17, 2012 through December 21, 2012, Shelina Everett conducted an off-site program review of National Personal Training Institute of Colorado's administration of the programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). Specifically, the institution's compliance with requirements under the gainful employment consumer information disclosure regulations (34 C.F.R. § 668.6). The findings of that review are presented in the enclosed report.

Findings of noncompliance are referenced to the applicable statutes and regulations and specify the action required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by National Personal Training Institute of Colorado. The response should include a brief, written narrative for each finding that clearly states National Personal Training Institute of Colorado's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, National Personal Training Institute of Colorado must provide supporting documentation as required in each finding.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination --

<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

- a. A written statement addressing the institution's response;
- b. A written statement of the basis for such report or determination; and
- c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and available for inspection by National Personal Training Institute of Colorado upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

The institution's response should be sent directly to Shelina Everett of this office within 30 calendar days of receipt of this letter.

**Record Retention:**

Program records relating to the period covered by the program review must be retained until the later of: resolution of the loans, claims or expenditures questioned in the program review; or the end of the retention period otherwise applicable to the record under 34 C.F.R. § 668.24(e).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Shelina Everett at (303) 844-4128 or [shelina.everett@ed.gov](mailto:shelina.everett@ed.gov).

Sincerely,

(b)(6)

Kerry L. O'Brien,  
Compliance Manager

cc: Dave Ranker, Chief Financial Officer

Prepared for

National Personal Training  
Institute of Colorado

**Federal Student Aid**  
AN OFFICE OF THE U.S. DEPARTMENT OF EDUCATION

PROUD SPONSOR of  
*the AMERICAN MIND*

OPE ID: 04185400  
PRCN: 201310828169

Prepared by  
U.S. Department of Education  
Federal Student Aid  
Chicago/Denver School Participation Division

## Program Review Report

March 1, 2013

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National Personal Training Institute of Colorado  
OPE ID: 04185400  
PRCN: 201310828169

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**A. Institutional Information**

National Personal Training Institute of Colorado  
1658 Cole Boulevard, Suite 50  
Lakewood, CO 80401-3304

Type: Proprietary

Highest Level of Offering: Non-Degree (600-899 clock hours)

Accrediting Agency: North Central Association Community on Accreditation and School Improvement

Current Student Enrollment: 85 (December, 2012)

% of Students Receiving Title IV: 62.3 % (December, 2012)

Title IV Participation (PC Net):

	<u>2011/2012</u>
Federal Pell Grant (Pell)	\$122,242
Federal Supplemental Educational Opportunity Grant (FSEOG)	\$0
William D. Ford Federal Direct Loan Program (Direct Loan)	\$368,376

Default Rate FFEL/DL: New school, no rate available.

## B. Scope of Review

The U.S. Department of Education (the Department) conducted an off-site program review at National Personal Training Institute of Colorado (NPTI Colorado) from December 17, 2012 to December 21, 2012. The review was conducted by Shelina Everett.

The focus of the review was Gainful Employment Disclosure. The review consisted of an examination of NPTI Colorado's disclosures related to programs that prepare students for gainful employment.

This review assessed NPTI Colorado's administration of the Title IV, HEA programs, specifically the institution's compliance with requirements under the gainful employment consumer information disclosure regulations.

### Disclaimer:

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning NPTI Colorado's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve NPTI Colorado of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

## C. Findings

During the review, several areas of noncompliance were noted. Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions to be taken by NPTI Colorado to bring operations of the financial aid programs into compliance with the statutes and regulations.

### **Finding 1: Reporting and Disclosure Requirements for Programs that Prepare Students for Gainful Employment in a Recognized Occupation Not Followed**

**Citation:** 34 C.F.R. § 668.6 (b) (1): For each program offered by an institution under this section, the institution must provide prospective students with—

(i) The occupations (by names and SOC codes) that the program prepares students to enter, along with links to occupational profiles on O\*NET or its successor site. If the number of occupations related to the program, as identified by entering the program's full six digit CIP code on the O\*NET crosswalk at <http://online.onetcenter.org/crosswalk/> is more than ten, the institution may provide Web links to a representative sample of the identified occupations (by

name and SOC code) for which its graduates typically find employment within a few years after completing the program;

(ii) The on-time graduation rate for students completing the program, as provided under paragraph (c) of this section:

(iii) The tuition and fees it charges a student for completing the program within normal time as defined in § 668.41(a), the typical costs for books and supplies (unless those costs are included as part of tuition and fees), and the cost of room and board, if applicable. The institution may include information on other costs, such as transportation and living expenses, but it must provide a Web link, or access, to the program cost information the institutions makes available under § 668.43(a):

(iv) The placement rate for students completing the program, as determined under a methodology developed by the National Center for Education Statistics (NCES) when that rate is available. In the meantime, beginning on July 1, 2011, if the institution is required by its accrediting agency or State to calculate a placement rate on a program basis, it must disclose the rate under this section and identify the accrediting agency or State agency under whose requirements the rate was calculated. If the accrediting agency or State requires an institution to calculate a placement rate at the institutional level or other than a program basis, the institution must use the accrediting agency or State methodology to calculate a placement rate for the program and disclose that rate; and

(v) The median loan debt incurred by students who completed the program as provided by the Secretary, as well as any other information the Secretary provided to the institution about that program. The institution must identify separately the median loan debt from title IV, HEA program loans, and the median loan debt from private educational loans and institutional financing plans.

(2) For each program, the institution must—

(i) Include the information required under paragraph (b)(1) of this section in promotional materials it makes available to prospective students and post this information on its Web site;

(ii) Prominently provide the information required under paragraph (b)(1) of this section in a simple and meaningful manner on the home page of its program Web site, and provide a prominent and direct link on any other Web page containing general, academic, or admissions information about the program, to the single Web page that contains all the required information;

(iii) Display the information required under paragraph (b)(1) of this section on the institution's Web site in an open format that can be retrieved, downloaded, indexed, and searched by commonly used Web search applications. An open format is one that is platform-independent, is machine-readable, and is made available to the public without restrictions that would impede the reuse of that information

**Noncompliance:** A review of NPTI Colorado's website reveals the following noncompliance:

- (1) The website does not disclose any occupational information or SOC codes listed for the personal fitness program.
- (2) There were 13 items under consumer information which included but were not limited to: "Completion/Graduation," "Price of Attendance" and "Placement Employment." However, the institution did not provide links to the information required for each of these 3 items.
- (3) NPTI Colorado's website was also missing an additional item that must be included under consumer information. Specifically, median loan debt was not listed.

**Required Action:** NPTI Colorado must correct these deficiencies to comply with the regulatory requirements cited and submit documentation to substantiate the corrections. Specifically, the institution must submit copies of the updated website as well as copies of the information contained on the required links. The functionality of the required links will be tested after the institution's response is received.

The institution must also provide a written response identifying the corrective actions that will be taken to ensure that the Gainful Employment Disclosure requirements are met in the future. This written plan must include a copy of procedures that detail what actions will be taken to ensure that Gainful Employment is disclosed to students. All of this information must be submitted with NPTI Colorado's response to the program review report.

Final Program Review Determination  
PRCN #: 201310828169

Appendix B

NPTI's Response  
to the Program Review Report

*The National Personal Training Institute of Colorado, LLC*



*An Approved School with the Division of Private Occupational Schools*

*State of Colorado Department of Higher Education*

*An accredited post-secondary career technical school by AdvancED / NCA CASI*

*Approved for International Students / Student Exchange Visitor Program (SEVP)*

1658 Cole Boulevard, Suite 50 Lakewood, Colorado 80401

Local phone: 303.238.9999 / Toll free: 1.877.215.2643 / FAX: 303.238.1821

February 13, 2013

Ms. Shelina Everett, Institutional Review Specialist  
U.S. Department of Education, School Participation Division – Chicago / Denver  
1244 Speer Boulevard, Suite 201  
Denver, CO 80204-3518

RE: *NPTI Colorado response to March 1, 2013 Program Review Report, OPE ID# 04185400*  
PRCN: 201310828169

Dear Ms. Everett:

Please note the following response to section C. Findings, page 4 (re: your review and subsequent letter dated March 1, 2012)

**Finding 1. (i) / Reporting and Disclosure requirements for Programs that Prepare Students for Gainful Employment in a Recognized Occupation Not found.**

**NPTI Response:** Prior to this review, this information was provided verbally and / or in writing upon request. Also, several references were made to this data in our promotional literature specifically referencing the U.S. Department of Labor, Bureau of Labor Statistics.

We agree with your finding in that there was not a readily available, active link to this information (i.e. to O\*NET, referencing CIP codes for this occupation and related occupations.

**Solution:** This has been completed. Please see our website / webpage:  
[http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php)

**Finding 1.(ii.) / On-time Graduation Rate**

**NPTI Response:** Prior to this review, this information was provided verbally and / or in writing upon request. This information was also available on the website of our accreditor, NCA CASI / AdvancED who is referenced on our website.

**NPTI Colorado Response to S. Everett Program Review Report / OPE ID # 04185400**

**Solution:** This action has been completed and made more prominently and readily available. Please see our website / webpage: [http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php)

**Finding 1.(iii.) / Tuition / Fees / Charges**

**NPTI Response:** Prior to this review, this information was provided verbally and / or in writing upon request. This information was also available in our Student Catalogue and Student Enrollment Agreement (both provided at Orientation and prior to beginning class) and via our Net Price Calculator (please see <http://www.nptitrainer.com/netpricecalc.php>). There are no room and board costs as we do not have housing.

**Solution:** This action has been completed and made more readily available electronically. Please see

- a. *Student Catalogue* / [http://www.nptitrainer.com/2013\\_npti\\_catalog\\_handbook\\_3.1.13.pdf](http://www.nptitrainer.com/2013_npti_catalog_handbook_3.1.13.pdf)
- b. *Student Enrollment Agreement* / [http://www.nptitrainer.com/2013\\_npti\\_enrollment\\_agreement\\_3.1.13.pdf](http://www.nptitrainer.com/2013_npti_enrollment_agreement_3.1.13.pdf)
- c. *Net price calculator* / <http://www.nptitrainer.com/netpricecalc.php>

**Finding 1 (iv) / Placement Rate**

**NPTI Response:** Prior to this review, this information was provided verbally and / or in writing upon request. Also, several references were made to this data in our promotional literature specifically referencing the U.S. Department of Labor, Bureau of Labor Statistics and per this webpage, [http://www.nptitrainer.com/personal\\_trainer\\_career.php](http://www.nptitrainer.com/personal_trainer_career.php)

**Solution:** This has been completed. Please see our website / webpage: [http://www.nptitrainer.com/personal\\_trainer\\_career.php](http://www.nptitrainer.com/personal_trainer_career.php)

**Finding 1 (v) / Median Loan Debt**

**NPTI Response:** Prior to this review, this information was provided verbally and / or in writing upon request.

**Solution:** This has been completed. Please see our website / webpage: [http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php)

**Finding 2 / For each program ....**

**NPTI Response:** NPTI Colorado provides only one program, Personal Fitness Trainer. For purposes of this response and all responses in this letter to the U.S. Department of Education, all references are relative to this one program.

**Finding 2 (i) Providing Data for each Program**

[ NOTE: This response assumes that you are referring to 34 CFR 668.6 (b)(1). Please advise if this is not the case. ]

**NPTI Response:** Prior to this review, this information was provided verbally and / or in writing upon request. Also, several references were made to this data in our promotional literature specifically referencing the U.S. Department of Labor, Bureau of Labor Statistics and per this webpage, [http://www.nptitrainer.com/personal\\_trainer\\_career.php](http://www.nptitrainer.com/personal_trainer_career.php)

**Solution:** This has been completed. Please see our website / webpages: [http://www.nptitrainer.com/personal\\_trainer\\_career.php](http://www.nptitrainer.com/personal_trainer_career.php), and [http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php)

**Finding 2 (ii) / All required information regarding general, academic, and admissions information**

**NPTI Response:** Prior to this review, this information was provided verbally, and on the website. This information has always been available on the website. It has not been made available on one single page as it was perceived that it was far too great of a volume of information for one webpage.

Both "Prominent and Direct Links" to other webpages are provided from the Home Page and have been provided. Please see the home page, <http://www.nptitrainer.com/>. Please see the drop down menu, "About NPTI". Please see the relevant section mentioned herein.

**Solution:** This has been completed. In an effort to consolidate all of this information in one place, in one document, please see our "Student Catalogue" and "Student Enrollment Agreement", both of which were previously provided at Orientation and prior to new NPTI students beginning class:

**Student Catalogue:** [http://www.nptitrainer.com/2013\\_npti\\_catalog\\_handbook\\_3.1.13.pdf](http://www.nptitrainer.com/2013_npti_catalog_handbook_3.1.13.pdf) **Student Enrollment Agreement:** [http://www.nptitrainer.com/2013\\_npti\\_enrollment\\_agreement\\_3.1.13.pdf](http://www.nptitrainer.com/2013_npti_enrollment_agreement_3.1.13.pdf)

**Finding 2 (iii) / All required information regarding general, academic, and admissions information**

**NPTI Response:** This information is available, from the home page, in an open format that can be retrieved, downloaded, indexed, and searched by commonly used Web search applications (both PC and Apple based).

**Solution:** Please explain how we can make this information more readily available. NPTI believes that the information is indeed readily available in electronic format and as defined herein.

NPTI Colorado Response to S. Everett Program Review Report / OPE ID # 04185400

Noncompliance

(1) Occupational Information / SOC Codes

a. Solution: Please see these NPTI Colorado webpages:

i. [http://www.nptitrainer.com/personal\\_trainer\\_career.php](http://www.nptitrainer.com/personal_trainer_career.php)

ii. [http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php)

(2) Consumer Information / 13 items / active links not provided

a. Solution: Please see these revised NPTI Colorado webpages:

i. [http://www.nptitrainer.com/personal\\_trainer\\_career.php](http://www.nptitrainer.com/personal_trainer_career.php)

ii. [http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php)

(3) Missing Median Loan Debt

a. Solution: Please see this webpage:

[http://www.nptitrainer.com/consumer\\_information.php](http://www.nptitrainer.com/consumer_information.php), last bullet

Required Action

- 1.) These deficiencies have been corrected with evidence to that effect (see referenced responses and web pages).
- 2.) Gainful Employment Disclosure data has always been provided, however, not in the electronic manner defined by the U.S. Department of Education and specifically not in the manner prescribed by 34 CFR 668.6. NPTI acknowledges this discrepancy and apologizes for this omission. NPTI Colorado is relatively new to Title IV Federal Student Aid and attributes this omission to its relative inexperience. As we now know the proper format and requirements (as is self-evident from the responses herein), future compliance is assured. Gainful Employment Data Collection requirements (from graduates) was already in place and is not an issue.

If you have further questions or additional, required explanation, please feel free to contact me using the contact information noted below.

Sincerely,



Philippe G. Ray, President

e-mail: [phil.ray@PersonalTrainingInstitute.edu](mailto:phil.ray@PersonalTrainingInstitute.edu)

office: 303.238.9999

cell: 303.810.0200

**Checklist - FPRD Review**

Responsible Reviewer: Shelina Everett	Delivery Tracking #: 7008 1300 0002 4224 3413
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