VIA: EMAIL and CERTIFIED MAIL

July 14, 2026

Shakeitha Sims
Campus President
Maestro College (350400)
10830 N. Central Expressway
Suite 252
Dallas, TX 75231

RE: Official Notification that the SHOW CAUSE ORDER issued to Maestro College (350400), 10830 N. Central Expressway, Suite 252, Dallas, TX 75231, on June 4, 2026, will be changed to DROPPED FROM ACCREDITED STATUS while on SHOW CAUSE ORDER, by the Executive Committee of the Commission of the Council on Occupational Education, effective October 13, 2026. The effective date of this decision is July 13, 2026.

Dear Shakeitha Sims:

The Executive Committee of the Commission of the Council on Occupational Education (COE) met on July 13, 2026, to take action on accreditation matters. At this meeting, the Executive Committee reviewed the institution's response to the Show Cause Order issued to the institution on June 4, 2026, by the Commission of the Council on Occupational Education.

Basis for Decision
Maestro College was placed on Probation Status on September 12, 2025, for failure to comply with the Council's minimum requirement of an unrounded composite score of 1.500 for the two most recent fiscal years as disclosed on a composite score worksheet included in the audit report (2026 COE Handbook of accreditation, p. 83).

Over the next four months, the Commission received four complaints raising concerns about institutional disclosures, communication with students, differences in proctoring statements and practices, limited interaction with institutional personnel, and the institution's expanding online AI-based education model. On March 6, 2026, the Commission issued a Notification of Apparent Deficiency (NAD).

On March 30, 2026, the Executive Committee reviewed the institution's response to the Notification of Apparent Deficiency, continued the NAD, and authorized an unannounced focused visit (UFV) to the institution on April 20-21, 2026.

The UFV team identified four Items of Concern in its report. The first involved the institution's continued use of its former name, Peloton College, on signage, voicemail messaging, the website, and other publications, despite COE approval of the institution's name change to Maestro College on July 9, 2025. The second Item of Concern involved inconsistencies between the program names appearing in institutional documents and on the institution's website and program names listed on the COE-approved program list. The third Item of Concern related to the financial stability of the institution. The UFV team noted that the institution's audited financial statement for the year ending December 31, 2024, reflected a composite score below COE's minimum requirement of 1.500, which led the Commission to place the institution on Probation Status in September 2025. The UFV team also acknowledged that the institution's audited financial statement for the year ending December 31, 2025, revealed that the composite score had increased above the minimum required threshold of 1.500.

Finally, the UFV team noted a substantial increase in the institution's Full-Time Equivalent (FTE). Maestro College reported an FTE increase of 25 percent or more to the Council on February 19, 2026. The UFV team confirmed this increase during its visit and further noted that the institution's FTE continued to rise at a significant rate in 2026. A substantial portion of this growth appeared to be attributed to increased enrollment in the Associate of Applied Science (AAS) degree programs offered by the institution through distance education.

The increase in enrollment in the AAS degree programs indicated that growth in distance education had substantially exceeded growth in traditional instructional delivery. As a result, the institution appeared to be moving further out of compliance with the eligibility requirement that an institution must "utilize a campus-based instructional delivery system with at least 25% of the institution's total Full-Time Equivalency (FTE) derived from enrollments in traditional (bricks and mortar) instruction" (COE 2026 Handbook of Accreditation, p. 7).

At its meeting on June 4, 2026, the Commission reviewed Maestro College's Probation Status, response to the Continued Notification of Apparent Deficiency, Unannounced Focused Visit Team's report and the Institution's response to the Unannounced Focused Visit.

The Commission confirmed that the institution's audited financial statements for the fiscal year ending December 31, 2025, yielded a composite score of 3.000 and determined that the institution met the Council's financial stability requirement. As a result, the institution was removed from Probation Status. Notwithstanding this action, the Commission determined that continued monitoring of compliance with Standard 7: Financial Resources was warranted under the Notification of Apparent Deficiency (NAD) based on information provided to COE regarding Maestro College's Final Audit Determination conducted by the Department of Education concerning the institution's administration of programs authorized under Title IV for the period January 1, 2025, through December 31, 2025.

The Commission reviewed the institution's response to the NAD and discussed an outstanding complaint filed against Maestro College on December 5, 2025. The Commission acknowledged that Maestro College had adequately addressed most of the concerns in the NAD. However, the institution's attempt to address inconsistencies in its monitoring/proctoring requirements related to online assignments and assessments remained unresolved because the institution has not demonstrated consistency between its stated proctoring and monitoring practices and the policies published in its enrollment agreement and student catalog.

As a result of the financial concerns raised by the Department and the unresolved issue related to online proctoring and monitoring, the Commission continued Maestro College on a Notice of Apparent Deficiency and requested an institutional response by July 22, 2026.

The Commission also reviewed the UFV Team's Report and Maestro College's response to the UFV team report and confirmed that Maestro College was in violation of the COE eligibility requirement that candidate and accredited institutions "utilize a campus-based instructional delivery system with at least 25% of the institution's total Full-Time Equivalency (FTE) derived from enrollments in traditional (bricks and mortar) instruction" (*COE 2026 Handbook of Accreditation*, p. 7). As a result, the Commission Placed the institution on a Show Cause Order and required the following of Maestro College:

1. Effective upon receipt of the action letter, the institution shall suspend enrollment of new students pending Commission review of the institution's response to the Show Cause Order.

2. A written comprehensive explanation as to why the institution should not be dropped from accredited status based on the COE's eligibility criteria and an explanation specifically addressing the Citation of Violation referenced above. Appropriate documentation to support the explanation should be included. **(Due: July 10, 2026)**

3. A six-month enrollment report disaggregated by program, month, and instructional modality (traditional or distance education) that clearly shows the number of students enrolled in each program. **(Due: July 10, 2026)**

4. Submission of an Institutional/Campus Conditional Teach-Out Plan. Instructions for the development of the teach-out plan are included on the enclosed Institutional/Campus Conditional Teach-out Plan template. The template is also available on the COE website (Applications & Forms | Council). **The Teach-out Plan should be submitted as a separate stand-alone document.** In keeping with our approach to sensitive information, do not send any documentation with Personally Identifiable Information (PII). Hence, please remove or redact student's names, SS numbers, DOBs, etc. prior to submission. **The Institutional/Campus Conditional Teach-Out Plan is due by: July 10, 2026**.

5. Financial Viability Plan covering past, current and projected enrollment by program, past, current and projected staffing levels, Monthly Revenue and Expenditures, Monthly Accounts Receivable and *Payable (2026 COE Handbook of Accreditation, p.23)* **(Due: July 10, 2026).**

6. A same-day balance sheet performed by an independent certified public accountant in accordance with Generally Accepted Accounting Principles (GAAP) and Generally Accepted Government Auditing Standards (GAGAS) for the day of July 1, 2026. **(Due: July 10, 2026)**

The institution submitted its response to the Show Cause Order on July 9, 2026. In its response, the institution acknowledged the Commission's finding and accepted responsibility for its failure to maintain compliance with the applicable eligibility requirement, stating that it "does not contest the requirement and does not seek a waiver of it." Upon review, the Commission confirmed that the enrollment data submitted by the institution substantiated the institution's noncompliance with the Council's eligibility

requirement that at least 25% of the institution's total Full-Time Equivalency (FTE) be derived from campus-based instruction. The data further reflected a significant disparity between FTE generated through campus-based instruction and FTE generated through distance education.

The institution proposed a "Corrective Action Plan" (CAP), which it asserted would "restore compliance with the 25% campus-based instructional delivery system requirement within eighteen (18) months or sooner" during the CAP Period. Upon review, the Commission determined that the institution's current enrollment distribution reflects a substantial imbalance between campus-based and distance education FTE and that the proposed timeframe for restoring compliance is not acceptable. Given the extent of the institution's noncompliance with the Council's eligibility requirement, the Commission determined that allowing the institution to remain out of compliance for the duration proposed in the CAP would be inconsistent with the Council's eligibility expectations and accreditation requirements.

In reaching its decision, the Commission considered the potential undue hardship that the action may impose on currently enrolled students. Accordingly, the Commission determined that it was appropriate to provide the institution with a reasonable period of time to implement an orderly teach-out of current students and to allow affected students sufficient time to explore available options for completing their programs of study.

As a result, the official action of the Commission was to **take the action as referenced in the subject line above**.

In accordance with the Department of Education regulation §602.26 (b), the institution must disclose this action to all current and prospective students within seven business days of receipt of this letter. Proof of this notification must be provided to the Council on Occupational Education (within 10 business days of receipt of this letter). Please note that this Commission action will be posted to the Council on Occupational Education's website within one business day.

Additionally, in accordance with the Department of Education regulation §602.24(c)(2)(iii), and COE Policy, COE must require an institution it accredits or preaccredits to submit a teach-out plan and, if practicable, teach-out agreements (as defined in 34 CFR 600.2) for approval upon the occurrence of the following event:

> (iii) COE acts to withdraw, terminate, or suspend the accreditation or preaccreditation of the institution.

The Institutional Teach-Out Plan submitted by Maestro College in response to the Show Cause Order was Denied by the Executive Committee, effective July 13, 2026. As such, Maestro College is required to submit **a revised** Institutional Teach-out Plan in accordance with the requirements specified by the Executive Committee with associated Teach-out Agreements, if applicable. Instructions for the development of the teach-out plan are included on the enclosed Institutional/Campus Conditional Teach-out Plan template. The template is also available on the COE website (Applications & Forms Council). The Teach-out Plan should be submitted as a separate, stand-alone document. In keeping with our approach to sensitive information, do not send any documentation with Personally Identifiable Information (PII). Hence, please remove or redact students' names, SS numbers, DOBs, etc. prior to

submission. This document must be submitted **within 14 days of receipt of this letter** via the EDvera portal.

As stated in the *Handbook of Accreditation: 2026 Edition, Section IV. The Accreditation Process, H. Commission Action, 3. Possible Commission Decisions, pages (15-24):*

> ***Show Cause Order*** *- Show Cause is a restrictive status assigned by the Commission because of one or more serious violations of the Standards, Criteria, and/or Conditions of the Council. Once imposed, Show Cause provides an institution with thirty calendar days to show why it should not be dropped. Imposition of this status will not extend the original time period for compliance previously specified by the Commission unless good cause has been demonstrated by the institution. (p. 23)*

This notice of the decision to Drop Maestro College from Accredited Status**, effective July 13, 2026**, is issued in accordance with the following condition of accreditation as stated in the *Handbook of Accreditation: 2026 Edition, Section IV. The Accreditation Process, H. Commission Action, 3. Possible Commission Decisions, pages (15-24):*

> *When an institution continues to be in violation of Standards, Criteria, and/or Conditions after being placed on Warning, Probation, or issued a Show Cause Order, or where circumstances are deemed sufficiently compelling, the Commission has the responsibility to take Adverse Action against an institution (e.g., drop the institution from candidate or accredited status, to deny initial accreditation or reaffirmation of accreditation, etc.), no later than the original deadline for compliance, if any, as stated in the Commission's letter. The Commission shall notify the chief administrator of the institution as to the nature of the action and the procedure to be followed if an appeal is filed. The decision of the Commission is final, subject to the appeal procedure, and will be made known to the public (p. 23).*

Below you will find a citation of the condition(s), standard(s), or policy(cies) violated, the statement of violation(s) and evidence of violation(s).

Citation of Violation
The *Handbook of Accreditation: 2026 Edition, Section III., Affiliation with COE, A.2. Candidate for Accreditation, Eligibility Requirements (p. 7-11):*

> *To be eligible for consideration by the Commission for candidacy for accreditation (pre-accreditation status), an institution must comply with each of the following eligibility requirements:*
>
> ***f.*** *Utilize a campus-based instructional delivery system with at least 25% of the institution's total Full-Time Equivalency (FTE) being derived from enrollments in traditional (bricks and mortar) instruction (p. 7).*
>
> *Further, Section III., Affiliation with COE, B.1. Accreditation, Eligibility Requirements, (p. 10-11):*

> *To be eligible for accreditation, an institution must comply with the following eligibility requirements:*
>
> ***a.*** *Continue to meet the eligibility requirements to be a candidate for accreditation (p. 10).*

Statement of Violation
Your institution is in violation of the COE eligibility requirement that candidate and accredited institutions "utilize a campus-based instructional delivery system with at least 25% of the institution's total Full-Time Equivalency (FTE) derived from enrollments in traditional (bricks and mortar) instruction" (COE 2026 Handbook of Accreditation, p. 7).

Evidence of Violation
Data presented in the institution's response to the Show Cause Order issued on June 4, 2026, indicates that the institution fails to meet the COE eligibility requirement that candidate and accredited institutions "utilize a campus-based instructional delivery system with at least 25% of the institution's total Full-Time Equivalency (FTE) derived from enrollments in traditional (bricks and mortar) instruction.

Request for Reconsideration
In accordance with the COE Policy, you may, only on one occasion, seek reconsideration by the Commission of significant information that was unavailable to the institution prior to an adverse action (*2026 COE Policy and Rules Manual, p. 41*). Information may bear materially on the financial deficiencies identified by the Commission or other serious issues that resulted in the adverse action being taken.

A reconsideration review would take place prior to an appeal board consideration of the adverse action. The Commission's determination relative to the significance or materiality of the new information is not separately appealable by the institution.

If you desire to request reconsideration of this decision, you must inform the Commission, in writing, within 20 calendar days of the date of this letter (**August 2, 2026**). Your letter should be addressed to Dr. Kirk Nooks, President and CEO, in the form of a certified letter and should include:

1. A formal request for reconsideration (which could include reasons for the request with a timeline to coincide with an orderly timeframe for students to transition).

Please note that if granted, a request for reconsideration may postpone the effective date for the Dropped from accredited status. A delay in the final Dropped from accredited status date should not be interpreted as a change in the final decision, but rather as an action to support enrolled students who are close to completion. This action would also require the institution to continue operating within the guidance of the Council's Standards, Conditions, Policies and Rules.

Appeal Information

The Handbook of Accreditation: 2026 Edition, Section IV. The Accreditation Process, H. Commission Actions, 3. Possible Commission Decisions, pages (15-26):

> *Once the stated time period for compliance expires, the institution will be subject to adverse action to be effective by the deadline specified in the Commission's letter (p. 22). No institutional response is required; however, an institution may choose to follow the appeals procedure described in Section IV. H. 5. of the Handbook of Accreditation (p. 24).*

If you desire to appeal this decision, you must inform the Commission, in writing, within 20 calendar days from the date of this letter (**August 2, 2026**). Your letter must contain the information, fee, and deposit as required in *Section IV. H. 5. Appealable Actions* of the *Handbook of Accreditation: 2026 Edition*, *pages 24-25*.

An appeal board may affirm, amend or remand, the adverse actions of the original decision-making body (Reference: *Policies and Rules of the Commission, 2026 Edition*, *page 41-43*).

Additional conditions regarding written comments are stated in the *Handbook of Accreditation: 2026 Edition, Section IV. The Accreditation Process, E. Commission Actions, 1. Possible Commission Decisions, pages (15-26)*:

> *An institution that does not choose to appeal may comment in writing regarding the Commission's action provided the response complies with Commission procedures and is received by the Commission within 20 calendar days of the notice of the Commission's action. Any response received by the Commission within 20 calendar days shall be included in the Commission's final report to the appropriate federal, state, and special agencies (p. 24).*

In the event that you fail to appeal this action within 20 calendar days from the date of this letter (**August 2, 2026**), all appropriate agencies shall be informed that the decision to Drop Maestro College from Accredited Status while on Show Cause Order will be final, effective October 13, 2026.

Finally, according to the Department of Education regulation section §602.26 (b), the Council on Occupational Education will provide written notice of a final decision of a Probation or equivalent status or an initiated adverse action to the Secretary, the appropriate State licensing authorizing agency, and the appropriate accrediting agency at the same time it notifies the institution of the decision and requires the institution to disclose such an action within seven business days of receipt to all current and prospective students. The Council also requires the institution to provide proof of this notification to COE within 10 business days of receipt of the letter. This information will be entered into the Database Accredited Postsecondary Institutions and Programs.

Sincerely,

Kirk A. Nooks, Ed.D.
President/Chief Executive Officer
Council on Occupational Education
KN/sl
Enclosure: Institutional Teach-out Template