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July 17, 2026

Dr. Tim Harrington
President and CEO
Maestro University
50 West Broadway, Suite 300
Salt Lake City, UT 84101

Dear Dr. Harrington:

The Distance Education Accrediting Commission (DEAC or the Commission) met on June 17, 2026 and again on July 9, 2026 to consider the record of the acquisition of Maestro University located in Salt Lake City, Utah, by the Maestro Education Group (MEG). The record included the following documents:

- April 17, 2026 Change in Legal Status, Form of Control, or Ownership On-site Evaluation Report;
- April 17, 2026 Federal Student Assistance On-site Evaluation Report;[1]
- Maestro University's May 18, 2026 response to those reports;
- June 23, 2026 third-party complaint and the institution's July 2, 2026 response;
- DEAC's June 26, 2026 letter to Maestro University inquiring into the show cause directive issued by Council on Occupational Education (COE) on June 10, 2026 to Maestro College and the public warnings and directives issued by COE to Maestro College for the last twelve months; and
- Maestro University's responses to these documents dated July 3, 2026.

With respect to the implementation of the change of ownership, the Commission is concerned that the ownership and control of Maestro University by Maestro Education Group (MEG), together with the documented record of serious compliance deficiencies identified by COE in MEG's operation of Maestro College, raise substantial questions regarding the control and oversight of Maestro University's governance, regulatory compliance, operational integrity, and ability to protect the interests of its students as required under DEAC Standard II.B. Accordingly, the Commission voted not to accept the institution's response to the April 17, 2026 Chair's Report and to direct the institution to Show Cause why its accreditation should not be withdrawn.[2]

The show cause directive will be in effect until January 2027 as DEAC reviews information provided by Maestro University and its progress toward achieving compliance with DEAC standards in accordance with the requirements set forth in this letter. The Commission may modify the scope of the show cause directive, require the institution to undergo a total re-evaluation of its compliance with DEAC accreditation standards, or withdraw the institution's accreditation if it is determined that such action is warranted.

Change of Ownership and DEAC's Review Timeline

The change of ownership records show that, effective December 10, 2025, Maestro Education Group (MEG) acquired 100 percent of the stock, assets, and business operations of Bottega University. MEG changed the institution's name from Bottega University to Maestro University and submitted an

[1] MEG notified DEAC on July 3, 2026 of its decision to withdraw the application to participate in Title IV.
[2] Maestro University may apply for substantive changes for review by the Commission.

application to DEAC seeking certification to participate in the Title IV Federal Student Assistance programs. DEAC conducted an on-site evaluation on March 19, 2026 to assess the implementation of the change in ownership and the institution's compliance under its new ownership.

During the course of the review of MEG and its control of Maestro University, the Commission became aware of publicly available information indicating that another institution, Maestro College, in which MEG holds 20 percent ownership, was subject to multiple sanctions by the Council on Occupational Education (COE). Public records maintained by COE and the U.S. Department of Education's Database of Accredited Postsecondary Institutions and Programs (DAPIP) show that Maestro College received from COE, a Notice of Apparent Deficiency on March 10, 2026, a Continued Notice of Apparent Deficiency on March 31, 2026, and a second Continued Notice of Apparent Deficiency on June 10, 2026. These escalating actions culminated in COE issuing a Show Cause Order on June 10, 2026, requiring Maestro College to demonstrate why its accreditation should not be withdrawn.[3]

DEAC Standard II.B – Reputation of Institution, Owners, Governing Board Members, Administrators, and Other Officials states:
The institution and its owners, governing board members, officials, and administrators possess sound reputations, a record of integrity, and ethical conduct in their professional activities, business operations, and relations. The institution's name is free from any association with activity that could damage the reputation of the DEAC accrediting process, such as illegal actions, fraud, unethical conduct, or mistreatment of consumers. The institution's owners, governing board members, officials, and administrators shall comply with the institution's policies and procedures governing conflicts of interest and other applicable rules of conduct.

By letter dated June 26, 2026, DEAC requested information regarding the nature and extent of the relationship between Maestro University and Maestro College that was being overseen by Maestro Education Group (MEG). The Commission's inquiry was prompted by COE's order of show cause to Maestro College, as well as by publicly available information on the MEG website (maestro.org) indicating a significant and ongoing relationship between the two institutions, including common ownership by MEG, evidence of shared operations and institutional interdependence, representations suggesting a close affiliation between the institutions, and representations promoting the ease with which students could transition between the two institutions, including the transfer of academic credits toward advanced degree completion at Maestro University. DEAC also identified multiple instances of inaccurate, misleading, and potentially deceptive statements made by MEG concerning Maestro University's relationship with and collaborations involving Maestro College. These representations raised serious concerns regarding the accuracy and transparency of information provided to current and prospective students of Maestro University and the public, as well as the institution's compliance with DEAC's Standards of Accreditation. Those standards require truthful, complete, and transparent representations in all institutional communications and advertising. DEAC documented these representations made on the maestro.org website and the basis for its concerns in detail in its June 26, 2026 letter, identifying specific examples of statements and marketing strategies that raised questions regarding the accuracy, transparency, and appropriateness of the information provided to students and the public.

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[3] On July 14, 2026 COE issued notification to the public of its decision to revoke Maestro College's accreditation, subject to appeal.

In addition, the Commission required Maestro University to provide a response to a complaint DEAC received on June 23, 2026, alleging that MEG was facilitating the transfer of distance education students enrolled at Maestro College to Maestro University as a potential means of addressing the Show Cause Order issued to Maestro College by COE. Although Maestro University categorically denied that any such plans had been established for Maestro College's distance education students, the Commission remained concerned by continued public representations on the maestro.org website that suggested an ongoing and interdependent relationship between Maestro College and Maestro University. These representations raised further concerns regarding the accuracy and transparency of information provided to students and the public, particularly in light of the show cause action pending against Maestro College.

In its July 3, 2026 response to the Commission's concerns identified in its June 26, 2026 letter, MEG leadership apologized for its actions and expressed a commitment to identifying a path forward that would maintain and demonstrate Maestro University's compliance with DEAC Standards of Accreditation. The Commission acknowledges these statements and the information provided by MEG that was requested in the June 26, 2026 letter; however, the assurances provided were not accompanied by clear, substantive, and documented actions demonstrating transparency, accountability, or a commitment to addressing the underlying concerns regarding public representations and communications with students.

The University did not provide any evidence of corrective action or of efforts to ensure that only accurate information is provided to students and the public. Instead, MEG removed all content related to the relationship between Maestro University and Maestro College from the maestro.org website. As of July 8, 2026 – the day before the Commission's July 9, 2026, meeting – information about this relationship could only be accessed through a user login. Without visibility into information regarding the relationship between Maestro College, Maestro University, their corporate governance, costs for enrollment, financial aid, and educational opportunities, neither DEAC nor the public had any way to know whether the information being communicated behind the firewall to students, prospective students, and the public was truthful or accurate. DEAC finds this inconsistent with the principles of transparency, accountability, and good-faith compliance expected of owners of DEAC-accredited institutions. A strategy focused on limiting public visibility of information, rather than correcting inaccuracies, disclosing relevant facts, and demonstrating compliance, does not provide assurance that MEG is operating Maestro University in accordance with DEAC Standard II.B.

In response to this show cause directive, the Commission is requiring the following documentation, due on **December 1, 2026**, for review at the January 2027 meeting:

1. Evidence that Maestro University provides complete and transparent disclosures to students and the public regarding its program offerings, enrollment costs, enrollment requirements, and accreditation status.

   The Commission requires the institution to demonstrate that all public representations are accurate, complete, and not misleading. The Maestro University homepage (maestro.edu) currently states: "Maestro University is an online institution offering accredited degree programs. We leverage cutting-edge technology and adaptive tutoring to deliver an experience that can outperform traditional universities – all while eliminating financial barriers."

This statement requires clarification and correction. Accreditation applies to the institution, not to individual degree programs; therefore, the phrase “accredited degree programs” may inaccurately imply that each program has received separate accreditation. The institution must revise its language to accurately describe its accreditation status only as permitted by Standard XIII.G.

Additionally, the institution must provide a clear explanation and supporting evidence for claims that its adaptive tutoring technology “can outperform traditional universities” and that it is “eliminating financial barriers.” The institution must define both of these claims, identify the evidence supporting them, and ensure that such statements are not aspirational, exaggerated, or misleading to prospective students, in accordance with Standard VIII.F. The institution must also demonstrate that all costs, fees, financial obligations, admission requirements, and conditions of enrollment are clearly and prominently disclosed to students before enrollment, as required by Standard XI.E.

2. MEG’s comprehensive strategy for demonstrating and assuring Maestro University’s ongoing compliance with the DEAC Standards of Accreditation. The strategy should identify the specific actions, the personnel involved, oversight mechanisms, accountability structures, and financial resources that MEG will implement to ensure sustained compliance, ethical institutional practices, accurate public representations, and protection of students’ interests, and fidelity to the institution’s mission pursuant to Standards II.A and B.

3. Internally prepared financial statements for the period ending October 31, 2026, and projections through October 31, 2027 for Maestro University demonstrating that the financial investments and financial support assured by MEG are being implemented in accordance with the pro forma financial statements submitted with the Change of Ownership Report. The financial statements must clearly reflect the application of MEG’s financial investments, the institution’s actual financial performance compared to the projections provided in the pro forma statements, and any material variances between projected and actual results, including explanations for such variances. See Standard XIV.C.

4. An updated strategic plan that reflects the institution’s current priorities, objectives, and initiatives following the change in ownership, including any plans for restructuring the organization. The revised plan should identify measurable goals, key performance indicators, responsible parties, implementation timelines, and processes for monitoring progress and assessing outcomes to demonstrate how the institution will achieve and sustain compliance with the DEAC Standards of Accreditation and in accordance with Standard III.B. MEG should fully disclose any and all strategic initiatives it plans to pursue for Maestro University.

5. A report documenting the institution’s current authorization status for participation in the State Authorization Reciprocity Agreement (SARA) through the Utah Department of Commerce Division of Consumer Protection and the applicable state authorization reciprocity portal. The report should identify the institution’s current authorization status, any conditions or limitations associated with that authorization, and any outstanding compliance requirements or actions necessary to maintain eligibility for distance education activity in states outside of Utah where Maestro University enrolls students and in accordance with Standard II.D.

Teach-Out Agreement Requirement. Institutions subject to a show cause directive must file a Teach-Out Agreement, in accordance with Section XXI.C. Part Two, Processes and Procedures, DEAC *Accreditation Handbook*. Maestro University must submit a Teach-Out Agreement with an accredited institution that offers distance education programs that are similar to those of Maestro University. This Teach-Out Agreement and list of currently enrolled students is due to DEAC to the attention of Jessica.lucey@deac.org by **August 17, 2026.**

Show Cause Remediation Period. The maximum Show Cause Remediation Period may not exceed the shorter of (a) two years, or (b) 150 percent of the length of the institution's longest program (unless the Commission extends the period for "good cause" as defined below). The burden of proof rests with the institution to demonstrate, within the Show Cause Remediation Period (as that may be extended for good cause shown) and consistent with the terms of the show cause directive, that it is meeting DEAC's accreditation standards. In no event will a Show Cause Remediation Period, including any good cause extensions which may be granted, exceed three years.

Decision Following Show Cause Remediation Period. Upon review of the application for accreditation or reaccreditation of an institution that has previously received a show cause directive, a decision is made on the institution's compliance with the accreditation standards or requirements noted in the directive. The Commission may:

• vacate the show cause directive;
• require a total re-evaluation of the institution's compliance with DEAC standards of accreditation in accordance with Part Two, Processes and Procedures, Section IX.C., DEAC *Accreditation Handbook*;
• continue the show cause directive and require the submission of additional information or further reports from the institution and/or a special visit in accordance with Part Two, Processes and Procedures, Section X.A., DEAC *Accreditation Handbook*; or
• revoke accreditation.

Status During Pendency of Show Cause Directive. An institution under a show cause directive will retain its accreditation status unless and until the Commission decides to deny or withdraw its accreditation, as applicable. Notice of the show cause directive will be published on DEAC's website and must be included by the institution in its description of its accreditation status, in accordance with the terms of Part Two, Processes and Procedures, Section XV.E., DEAC *Accreditation Handbook.*

DEAC Notification Procedure. DEAC provides written notice of the Commission's issuance of a show cause directive to the U.S. Secretary of Education, the appropriate state licensing or authorizing agencies, and the appropriate accrediting organizations, and the public (through the DEAC website) at the same time it notifies the institution of the decision, but no later than 30 days after the Commission makes a decision to place an institution on Show Cause. DEAC requires the institution that is subject to the show cause directive to disclose the action to all current and prospective students within seven business days of receipt of the written notice of the show cause order. Such notice must, at minimum, meet the requirements of Part Two, Processes and Procedures, Section XVI.A.2. DEAC *Accreditation Handbook.*

Disclosures to Students and Prospective Students. The Commission requires the institution that is subject to the show cause directive to disclose the action to all current and prospective students within seven business days of receipt of the written notice of the show cause directive. Such notice must, at minimum, meet the requirements of Section XVI.A.2. Processes and Procedures, DEAC *Accreditation*

Handbook. In accordance with Title 34 *Code of Federal Regulations* §668.43(a) (19) the notice to enrolled and prospective students must include notice that the institution is being required by DEAC to maintain a teach-out agreement. Maestro University must ensure that such disclosures regarding the accreditation status of the institution remain current.

Lastly, the Commission determined that Maestro University may pursue substantive changes while under the show cause directive if such substantive change supports corrective actions and compliance with accreditation standards.

Should you have any questions, please contact me directly.

Sincerely,

Leah K. Matthews, PhD
Executive Director

cc: Dr. Marcia Ditmyer, Chair of the Commission
Dr. Kirk Nooks, President/CEO of the Council on Occupational Education
Ms. Marla Winegar, Commerce Manager, Utah Department of Commerce, Division of Consumer Protection

Encl: Full text of accreditation standard citations

Enclosure

DEAC Accreditation Standards Cited in Show Cause Directive

Standard II.A Owners, Governing Board Members, Officials, and Administrators
The institution's owners, governing board members, officials, and administrators possess appropriate qualifications and experience for their positions. The owners, governing board members, officials, and administrators are knowledgeable and experienced in one or more aspects of education administration, finance, and the design and delivery of academic programs and related student services within a distance learning model. The institution's policies clearly delineate the duties and responsibilities of owners, governing board members, officials, and administrators. Individuals in leadership and managerial positions are qualified by education and experience appropriate to their position and have the ability to oversee institutional operations consistent with the institution's mission and program offerings.

Standard II.B. Reputation of Institution, Owners, Governing Board Members, Administrators, and Other Officials
The institution and its owners, governing board members, officials, and administrators possess sound reputations, a record of integrity, and ethical conduct in their professional activities, business operations, and relations. The institution's name is free from any association with activity that could damage the reputation of the DEAC accrediting process, such as illegal actions, fraud, unethical conduct, or mistreatment of consumers. The institution's owners, governing board members, officials, and administrators shall comply with the institution's policies and procedures governing conflicts of interest and other applicable rules of conduct.

Standard II.D. Maintaining Eligibility for Accreditation
The institution maintains its eligibility for accreditation and is properly licensed, authorized, exempted, or approved by all applicable state education institutional authorizations (or their equivalent for non-U.S. institutions). Exemptions from state law are supported by state-issued documentation or by statutory language for that jurisdiction.

Standard III.A. Mission Achievement
The institution plans and implements comprehensive processes with clearly defined metrics and criteria to monitor effectiveness of all aspects of the institution's operations against the institution's mission and any initiatives identified in the strategic plan. The institution shares appropriate information from the data gathered with relevant stakeholder groups.

Standard III.B. Strategic Planning
The institution implements a strategic plan utilizing a systematic process for the achievement of goals that support its mission. The institution's planning processes involve all areas of the institution's operations in developing strategic initiatives and goals by evaluating external and internal trends. Data is used to identify areas of weakness and opportunities for improvement, development, and growth. The plan helps institutions set priorities, manage resources, and set goals for future performance. The strategic plan addresses, at a minimum, finances, academics,

technology, admissions, marketing, personnel, and institutional sustainability and includes measurable action plans that lead to mission achievement. The plan identifies the individuals responsible, timelines for completion, and the financial resources required. The institution reviews the strategic plan at least annually and reports achievement of progress to its stakeholders.

Standard XI.E. Financial Disclosures
All costs relative to the education provided by the institution are disclosed to the prospective student in an enrollment agreement or similar contractual document before enrollment. Costs must include tuition, educational services, textbooks, and instructional materials; any specific fees associated with enrollment, such as application and registration fees; and fees for required services such as student authentication, proctoring, technology access, and library services.

Standard XIII.F. Advertising and Promotion
The institution conforms to ethical practices in all advertising and promotion to prospective students. The institution's processes and procedures ensure that all advertisements, website content, and other marketing collateral is truthful, accurate, and clearly stated. The institution complies with DEAC's Catalog Disclosures Checklist and DEAC's Website Disclosures Checklist.

Standard XIII.G. Institution and Course Accredited-Status Recognition
The institution accurately discloses its accredited status and uses the official DEAC accreditation logo and/or statement of accreditation when publishing its accreditation status in advertisements and promotional materials on its website and in social media. DEAC's name, address, telephone number, and web address are published in the institution's catalog. Institutions publish a statement of accreditation only as follows:
• Accredited by the Distance Education Accrediting Commission
• DEAC Accredited

Standard XIV.C. Financial Stability and Sustainability
Financial statements must reflect that the institution has sufficient resources to meet the institution's financial obligations to provide quality instruction and service to its students for the full period of each student's enrollment, consistent with the institution's program representations.