



Accrediting Commission of Career Schools and Colleges

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June 26, 2019

ELECTRONIC DELIVERY

████████████████████
Director
Caribbean Forensic & Technical College
PO Box 13734
San Juan, Puerto Rico 00908

School #M070402

Dear ██████████:

At the May 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Caribbean Forensic & Technical College (“CFTC”) located in San Juan, Puerto Rico on Employment Verification Reporting. Upon review of the October 25, 2018 ACCSC letter and the school’s response, the Commission voted to place CFTC on **Warning** with a subsequent review scheduled for ACCSC’s November 2019 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commission Review:

The Commission took note of the following history regarding CFTC’s verification of initial graduate employment:

- At the August 2016 meeting, the Commission voted to grant CFTC renewal of accreditation and placed the school on Employment Verification Reporting. In response to the March 31, 2016 Team Summary Report, CFTC did not provide the documentation that the school relied upon to classify the graduates as “Employed in Field” and a justification on how the school’s reported data could be considered “reliable” as requested by the Commission. As such, the Commission voted to place the school on Employment Verification Reporting in order to monitor the effectiveness of the school’s policies and procedures for employment verification.
- At the February 2017 meeting, the Commission voted to continue CFTC on Employment Verification Reporting. Although the September 7, 2016 Commission letter directed CFTC to submit a copy of the school’s completed employment verification form for the employed graduates, the school only provided a blank copy of its Employment Form and not completed forms for the eight employed students listed by the school. The Commission also found that the school’s description of the process and procedures for recording and verifying graduate employment was limited.
- At the August 2017 meeting, the Commission voted to defer final action on CFTC’s Employment Verification Report in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards. In the April 4, 2017 letter, the Commission directed CFTC to submit a description of the school’s process and procedures for recording and verifying graduate employment along with a copy of the verification form or other tool the school utilizes to verify employment. The Commission also directed the school to submit employment verification information and documentation for students who gained employment in the career field for which the school provided education between April 1, 2017 and June 30, 2017. In its response, CFTC submitted only a list of seven students who gained employment in the career field without any employment verification documentation or a narrative regarding the school’s process and procedures for recording and verifying graduate employment. Therefore, the Commission found that CFTC did not provide documentation to demonstrate that the school verifies initial employment of graduates.

- At the August 2018 meeting, the Commission voted to again continue CFTC on Employment Verification Reporting. The Commission found that the school's process and procedures for recording and verifying graduate employment did not include information regarding career advancement. In addition, in reviewing the employment verification forms, the Commission noted that the school reported one Forensic Fingerprint & Photo. Specialist (Certificate) program graduate as employed as an Encargada Cocina, or Kitchen Manager; however, the form indicated that the employment was not related to the field of study. The Commission also questioned how another graduate listed as a Compras (translated to Purchases) for Pan Pepin, Inc., which appears to be a bread manufacturer and distributor, was employed in the Forensic Fingerprint & Photo. Specialist field

May 2019 Commission Meeting

CFTC must demonstrate that the Commission can place a high level of reliance upon information, data, and statements provided by the school through supplying verifiable records of each graduate's initial employment (*Preamble, Introduction, Rules of Process and Procedure; Section VI (C)(2), Substantive Standards, Standards of Accreditation*). The school must also support its reported rates of graduate employment by maintaining verifiable records of initial employment (*Section VI (C)(2) and Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In the October 25, 2018 ACCSC letter, the Commission directed CFTC to submit a description of the school's process and procedures for recording and verifying graduate employment to include information for graduates reported in the "Career Advancement" category. The school did not provide a description or a copy of the school's process and procedures for recording and verifying graduate employment in the response. In addition, the Commission directed the school to submit documentation for graduates identified as employed in the career field for which the school provided education between November 1, 2018 and January 31, 2019. In its response, the school included information for six students with the dates of initial employment of January 1999; September 2007; May 2014; December 2016; March 2018; and October 2018. As such, it appears that most of these students fall under career advancement.

The Commission again reminds CFTC that per ACCSC's *Guidelines for Employment Classification*, students that are already employed in the field of study at the time of graduation¹ can be considered employed when completing the program of study when the school shows with written documentation from the employer or the graduate that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate's ability to be eligible or qualified for advancement due to the training provided by the school (*Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*). In reviewing the response, the Commission found that the employment verification forms submitted by the school do not contain written documentation from the employer or the graduate that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate's ability to be eligible or qualified for advancement due to the training provided by the school. The Commission cited this portion of the *Guidelines for Employment Classification* regarding career advancement previously in the April 4, 2017, May 3, 2018, and October 25, 2018 letters giving the school abundant time to create or amend its employment verification policies to include career advancement and to document instances of career advancement. Despite numerous opportunities to update or create such policies, the Commission found that the school has continuously failed to document graduates who fall into this category. This is particularly perplexing given that the majority of the school's graduates gain employment as career advancement.

¹ The intent of this provision does not apply in cases where a student secures employment toward the end of the program but prior to graduation, where the employment is based on the near anticipated completion of the program (e.g., externship to hire prior to graduation).

Based on the response, the Commission also questions whether the employment classification for the following graduates is appropriate and reasonable based on the educational objectives of the program and if employment is directly related to the program from which the individuals graduated:

Name	Program	Program Start Date	Date of Initial Employment	Place of Employment	Descriptive Job Title
[REDACTED]	Private Detective	October 2017	May 2014	[REDACTED]	Teacher
[REDACTED]	Private Detective	August 2018	January 1999	[REDACTED]	Paralegal Officer
[REDACTED]	Private Detective	January 2018	March 2018	[REDACTED]	Armed Security

The Commission found that the school did not provide justification that these positions align with a majority of the educational and training objective of the Private Detective program.

The Commission first placed CFTC on Employment Verification at the August 2016 meeting. In the nearly three years since that time through four subsequent reviews of CFTC’s employment verification information, ACCSC found that the school has failed to demonstrate that the Commission can place a high level of reliance upon information, data, and statements provided by the school through supplying verifiable records of each graduate’s initial employment. The school failed to submit complete documentation in several of the responses and does not appear to have any policy or the ability to document graduates classified as career advancement. Therefore, the Commission voted to place CFTC on Warning and directs the school to submit the following:

- a. A description of the school’s process and procedures for recording and verifying graduate employment. The school must also include a copy of the current verification form or other tool the school utilizes to verify employment. The policy and verification form must also include information for graduates reported in the career advancement category.
- b. For each graduate that the school has identified as employed in the career field for which the school provided education between July 1, 2019 and September 30, 2019, submit the following information:

Graduate Name	Program	Start Date	Employer, Contact, Address, & Phone#	Date of Initial Employ.*	Descriptive Job Title

* As a reminder, for students already employed in the field of study at the time of graduation, the school must provide documentation required in item (iv.) below.

- c. The school must also provide the following supplementary information:
 - i. A copy of the school’s completed verification form (as indicated in item a. above) for each graduate employed listed in b. above;
 - ii. Supporting and verifiable documentation or a narrative justification for each graduate in b. above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.
 - iii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:

- The graduate’s name and contact information;
 - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
 - An attestation that the graduate is earning training-related income; and
 - In cases where licensure is required for employment, an attestation that such licensure has been achieved.
- iv. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.
- d. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s employment verification requirements.

Warning Restrictions:

Pursuant to *Section VII (K)(7), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Notification to Students:

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

Response Requirements:

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school’s compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission’s deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school’s compliance with accrediting standards.

CFTC must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.² If the school’s response contains documentation that includes personal or confidential student or staff information that is not required for the Commission’s review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

² ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

CFTC must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before October 8, 2019**. If a response, the required fee,³ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before October 8, 2019**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

³ ACCSC assesses a \$500 processing fee to a school placed on Warning.