

September 6, 2018

**ELECTRONIC DELIVERY**

██████████  
Director  
Educational Technical College  
Calle Hostos #20  
San Sebastian, Puerto Rico 00669

*School #B070897  
Probation Order*

Dear ██████████

At the August 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered:

- The Commission’s previous decision to place Educational Technical College located in San Sebastian, Puerto Rico on Warning;
- Educational Technical College’s Application for Renewal of Accreditation; and
- Student achievement data included in the school’s 2016 Annual Report Rates.

Based upon the April 4, 2018 Warning Order, the September 7, 2016 deferral, April 14, 2017 deferral, the May 19, 2016 Team Summary Report (“TSR”), which summarizes the findings of the visiting team from the Renewal of Accreditation on-site evaluation, the 2016 Annual Report Rates, and Educational Technical College’s respective responses, the Commission voted to place the school on **Probation** with a subsequent review scheduled for ACCSC’s **February 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’s Review**

#### **August 2016**

The Commission first considered Educational Technical College’s Application for Renewal of Accreditation and voted to defer final action based on ongoing questions regarding the school’s compliance with accrediting standards in the areas of student achievement outcomes; licensure examination pass rates for the Practical Nursing, Cosmetology, and Respiratory Care Technician programs; instructional materials; timely refunds; and verifiable records of initial employment.

#### **November 2016**

ACCSC notified Educational Technical College that the school had reported below-benchmark employment rates in the Childcare and Development Assistant (12-month Certificate); Information Processing Specialist with Medical Billing (12-month Certificate); and Respiratory Care Technician (13-month) programs. The Commission afforded Educational Technical College an opportunity to provide updated student achievement outcomes data for the three programs.

#### **February 2017**

The Commission considered its previous decision to defer action on the Application for Renewal of Accreditation in conjunction with the 2016 Annual Report rates and voted to again defer final action based on ongoing questions regarding the school’s compliance with accrediting standards in the areas of student achievement outcomes, licensure pass rates, employment classifications, instructional materials, and refund policy. The Commission noted below benchmark rates for Information Processing Specialist with Medical

Billing program and the Respiratory Care Technician. The Commission also questioned the efforts taken by the school to improve licensure examination pass rates for the Practical Nursing program, Basic Cosmetology, and Respiratory Care Technician program. Additionally, the Commission questioned the employment classifications for the Practical Nursing and Respiratory Care Technician programs and required an update regarding the graduations and employment rates with misclassification removed from the school's data.

**August 2017**

The Commission considered its previous decisions to defer action on the Application for Renewal of Accreditation in conjunction with the 2016 Annual Report rates and voted to issue a Warning Order to the school. The Commission's decision was based on the ongoing questions regarding Educational Technical College's refund policy. The Commission also questioned if the refund policy was in compliance with federal regulations. Additionally, the Commission questioned if Educational Technical College was consistently executing the attendance and refund policies as published in the school's catalog. In addition, the Commission questioned the viability of the school's programs due to the continued low graduation and employment rates reported by the school for the Information Processing Specialist with Medical Billing, Respiratory Care Technician, Practical Nursing, Basic Cosmetology, Child Care and Development Assistant, and Electricity programs using a May 2018 Report Date. The Commission also again expressed concern that the below benchmark graduate employment rates for Respiratory Care Technician and Practical Nursing were attributed to low number of graduates attempting to take the required licensure exams.

**August 2018 Commission Review and Action**

1. Educational Technical College must demonstrate successful student achievement by maintaining acceptable rates of student graduation and/or graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In addition, Educational Technical College must demonstrate acceptable licensure/certification exam pass rates for the Practical Nursing and Respiratory Care Technician programs (*Section VII (B)(1)(b)(iii), Substantive Standards, Standards of Accreditation*). In response to the Commission's April 4, 2018 Warning letter, Educational Technical College reported the following rates of graduate employment on Graduation and Employment Charts prepared using a May 2018 Report Date:

Program	Length Months	Grad	July 2016 Report Date	Nov. 2016 Report Date	June 2017 Report Date	July 2017 Report Date	May 2018 Report Date	ACCSC Benchmark Rate
		Employ						
Information Processing Specialist with Medical Billing	12	G%	73%	61%	43%	57%	59%	55%
		E%	22%	20%	25%	56%	44%	70%
Respiratory Care Technician	13	G%	72%	50%	40%	46%	46%	50%
		E%	29%	21%	0%	40%	25%	70%
Practical Nursing	13	G%	65%	N/A	54%	52%	44%	50%
		E%	68%	N/A	38%	33%	18%	70%

The Commission also noted the following graduation and employment rates on the Graduation and Employment Charts prepared using a May 2018 Report Date:

Program	Length Months	Grad	April 2017 Report Rate	May 2018 Report Date	ACCSC Benchmark Rate
		Employ			
Basic Cosmetology	13	G%	38%	25%	50%
		E%	74%	60%	70%
Child Care and Development Assistant	12	G%	56%	67%	55%
		E%	60%	50%	70%
Electricity (Satellite -Lares location only)	13	G%	36%	30%	50%
		E%	40%	100%	70%

The Commission found that Educational Technical College reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates, in some cases since the July 2016 Report Date, and in a number of programs, the reported rates are significantly below benchmark.<sup>1</sup> In response to the April 4, 2018 Warning Order, Educational Technical College provided a description of the factors impacting the aforementioned programs’ student achievement rates, which includes a description of the devastating effects that Hurricane Maria had on the school, students, faculty, and in general, all facets of life in Puerto Rico. Educational Technical College explained that the population in Puerto Rico continues to decrease as citizens are leaving Puerto Rico for mainland United States and as a result, Educational Technical College experienced a decline in student population. Specifically, Educational Technical College noted in each program a significant number of graduates that moved out of Puerto Rico to mainland United States prior to gaining employment in Puerto Rico. Educational Technical College explained that the overall decrease of population across in Puerto Rico includes the school’s students and that these students were unable to either graduate from the school or gain employment after graduation due to the conditions in Puerto Rico. Furthermore, Educational Technical College explained that due to the licensing requirements of the new state of residence, several of the graduates were unable to meet all licensing requirements of the state where the graduates now resides. The Commission understands the challenges Educational Technical College faces with decreasing population and graduates moving out of Puerto Rico; however, issues related to poor student achievement outcomes predate Hurricane Maria. While the Commission mindful of the impact of the hurricane on the island and its inhabitants, the Commission can neither overlook the school’s history of poor performance nor eliminate the school’s responsibilities to demonstrate that an acceptable number of students graduate and that there are employment opportunities available for those graduates.

Educational Technical College’s response summarized a number of initiatives the school implemented to increase student enrollment, graduation, and employment rates. Educational Technical College’s response states that the school’s San Sabastian location is not the ideal location to provide education due to the areas continued decline in population and employment demands. Educational Technical College stated that the city of Lares – where the current satellite is located – appears to be a more favorable location for the school due to Lares’ potential employment opportunities for graduates and described the school’s plans to change location from San Sabastian to Lares. Subsequent to Educational Technical College’s response to the April 4, 2018 Warning Order, the Commission recognized the recent approval of Educational Technical College’s Application for a Change of Location-Part I that the Commission issued to the school on July 31, 2018. The application indicates that the school intended to change location on August 1, 2018 from San Sabastian to Lares. Educational Technical College also

<sup>1</sup> Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.

indicated that it is the school's intention to close the satellite facility located in Lares and only operate the branch in its new location of Lares.

Educational Technical College described the initiatives that the school has undertaken to serve students better, specifically with regard to gaining employment. Educational Technical College stated that the school continues to evaluate the support services provided to students and graduates, including career preparation and employment search assistance. Specifically, Educational Technical College stated that for those programs that require licensure – Basic Cosmetology, Respiratory Care Technician, Practical Nursing, and Electricity – the graduates of the programs require assistance with securing documentation needed to apply for provisional licenses as well as taking the licensing exams. To ensure the support of the graduates and the licensing process, Educational Technical College stated that the school developed a form that allows a student to authorize a Career Service staff member to assist with the provisional license exam process, such as securing the necessary documentation for the student to complete the licensing process and track the students' progress through the licensing process. Educational Technical College also stated that the school pays the cost of the provisional license application, exams and licenses for the graduates if the graduate requires financial assistance. Educational Technical College provided copies of the checklists for graduates to utilize to ensure that each graduate understands the specific documentation necessary to complete the licensing exam process. Additionally, Educational Technical College provided an analysis of the effectiveness of the school's efforts by providing retention data using a June 2018 Report Date. The Commission noted from the Retention Charts that the Basic Cosmetology, Electricity, Information Processing Specialist with Medical Billing programs had a 100% retention rate and that the Practical Nursing program had a 67% retention rate. Educational Technical College stated that given the positive retention results and the enhancements made to the services and licensing support provided to students and given the change of location from San Sebastian to Lares, Educational Technical College expects graduation and employment rates to increase. The Commission, however, is interested in monitoring contemporaneous retention information to assess the school's progress in this regard and as a means to assess the effectiveness of the school's most recent efforts. Therefore the Commission will request further retention data as part of the response to this letter.

Additionally, in response to the Warning Order and as required by the Commission, Educational Technical College provided a program viability study for the Information Processing Specialist with Medical Billing, Respiratory Care Technician, and Practical Nursing programs to address the low graduate employment rates. Educational Technical College conducted a survey among 16 local businesses in multiple cities, including San Sebastian and Lares, asking key questions regarding the employers' need to hire staff in the related field, employers' educational requirements for staff members, and the employers' skills and knowledge requirements for staff members. The school provided the following viability results for each program area:

### **Respiratory Care Technician**

From the conducted surveys, Educational Technical College noted that employers require staff to possess the same skills as Educational Technical College's Respiratory Care Technician program processes. The survey results also concluded; however, that employers prefer Respiratory Care Technicians to be licensed. Educational Technical College provided the following statement regarding the difficulty for students to obtain the license:

*Unfortunately the inconsistency of the dates for the licensing exams make it difficult for students to obtain employment as they lack the professional license and the provisional license provided if the graduate registers to sit for the upcoming licensing exam, but given the*

*inconsistency of the dates for the licensing exams, some of our graduates have the provisional licenses expire and these are not renewable and given that licensing exams are not given on a regular basis and sometimes are cancelled until further notice, students miss job opportunities because of the inability to secure the professional license.*

Educational Technical College stated that due to the continuous below benchmark student achievement rates and the feedback from employers confirming that the majority of employers do not need respiratory therapists, the school chose to discontinue the program and provided a copy of the Programmatic Teach-Out Plan Approval form to the Commission.

### **Practical Nursing**

Educational Technical College stated that the school surveyed six employers and found that the majority of employers indicated in the survey that there is no need for Practical Nurses. Educational Technical College also stated that when looking at the required skills for a Nurse with the identified employers, the school found that there is a greater need for nurses with associate and baccalaureate degree level education:

*The current jobs available for Practical Nurses in Puerto Rico do not require/allow certificate earning Practical Nurses to perform some of the duties described by the potential employers surveyed in this study. Practical Nurses are required to provide selective care to patients, basic procedures and techniques and while they can make observations regarding the patient health status, this information must be reported to a supervising Nurse or supervisor as required by Law.*

The Commission noted that Educational Technical College did not provide specific details regarding job opportunities and future employment forecasts for the field of Practical Nursing. In addition, given that the survey results support a possible lack in the need for Practical Nurses, the Commission questions the viability of the Practical Nurse program and is interested in how Educational Technical College plans to ensure job opportunities for the Practical Nursing graduates.

### **Information Processing Specialist with Medical Billing**

EUTEC stated that the school surveyed eight employers and found that the majority of employers indicated in the survey that there is no need for trained staff in the Information Processing Specialist with Medical Billing field. The survey results also provided the school with specific areas that employers would prefer their staff to obtain, which Educational Technical College stated the identified areas appear to be included in the Information Processing Specialist with Medical Billing program's curriculum. The Commission noted, however, that Educational Technical College did not provide specific details regarding job opportunities and future employment forecasts for the field of Information Processing Specialist with Medical Billing.

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Overall, the Commission acknowledges the unfortunate circumstances in Puerto Rico that have impacted the island's population employment opportunities for graduates; however, the Commission determined that it is imperative for Educational Technical College to demonstrate that the school's programs are viable. To continue to offer programs which are viable and which do not lead to employment would be a disservice to the residents of Puerto Rico who may already be beset by a host of challenges. If Educational Technical College's determines that any of the school's program offerings

are not viable, Educational Technical College has a responsibility to teach-out those programs. Educational Technical College is reminded, as set forth in *Section VII (B)(2)(c), Substantive Standards, Standards of Accreditation*, the Commission at its discretion may take a programmatic action such as to require an on-site evaluation; temporarily require a school to cease enrollment in a program; suspend or revoke program, degree-granting; or may take an institutional action when the Commission has determined that the school has not demonstrated acceptable student achievement either through its student learning assessment efforts, rates of graduation or employment attainment, or a combination thereof (see also *Section VII (R), Rules of Process and Procedure, Standards of Accreditation*). This letter serves as notice that the Commission will take further programmatic or institutional action if the school cannot demonstrate improvement in the student achievement outcomes of its programs.

Furthermore, the Commission is concerned that the implemented strategies to improve student achievement rates are not having the desired impact as the reported rates continue to decrease since the last reporting period. To date, despite the Commission's monitoring of the reported rates of student achievement and concordant institutional actions, and the school's reporting on its continual efforts to enhance and support student achievement, Educational Technical College has been unable to demonstrate a level of improvement that would bring the schools rates of student achievement to minimally acceptable levels. The Commission noted the amount of time already afforded to the school to demonstrate successful student achievement rates and to increase licensure pass rates for those programs that require students to obtain licensure for employment. Given the continuous low graduation and employment rates for the Practical Nursing, Information Processing Specialist with Medical Billing, Basic Cosmetology, Child Care and Development Assistant, and Electricity diploma programs, the Commission concerned that the rates may continue to decrease despite the noted efforts of the school.

In addition, the viability studies and employer feedback specifically for the Practical Nursing and Information Processing Specialist with Medical Billing programs indicate that the aforementioned programs may not be viable in Puerto Rico. Overall, the Commission found that Educational Technical College's response lacked support of future employment opportunities for graduates of the Practical Nursing and Information Processing Specialist with Medical Billing programs. While Educational Technical College provided reasons for the low number of graduates taking the licensure exam, Educational Technical College failed to demonstrate in what ways the school has and will continue to ensure that the school is providing graduates with support services to assist the graduates with gaining employment in other states.

Lastly, given Educational Technical College's change of location and the school's expectation that the new location of the school in Lares will positively affect the school by increasing student population, increasing employment demands for the graduates, and contributing to the retention of the student population, the Commission will provide Educational Technical College with a final opportunity to demonstrate the aforementioned positive outcomes at the Lares location.

Based on the foregoing, the Commission directs the school to submit the following:

- a. An updated description of the factors impacting student achievement, the school's strategies being implemented to overcome those factors (paying particular attention to the impact of the change of location to Lares), and an analysis and assessment of the effectiveness of the school's efforts for each of the following programs: Information Processing Specialist with Medical Billing, Practical Nursing, Basic Cosmetology, Child Care and Development Assistant, and Electricity;

- b. A list of graduates who moved outside of Puerto Rico for the period of July 1, 2018 – November 30, 2018 and details regarding how the school accommodated each graduate with finding employment in the related field despite not residing in Puerto Rico;
- c. An ACCSC Retention Chart for the Practical Nursing, Information Processing Specialist with Medical Billing, Basic Cosmetology, Child Care and Development Assistant, and Electricity programs using a **December 2018 Report Date**;
- d. Graduation and Employment Charts for the Practical Nursing, Information Processing Specialist with Medical Billing, Basic Cosmetology, Child Care and Development Assistant, and Electricity diploma programs using a **December 2018 Report Date**;
- e. An explanation – for each program – about the quality and ongoing viability of **each** program, in light of the reported student achievement outcomes and an ACCSC Programmatic Teach-Out Plan Approval Form for any program the school has determined to discontinue and/or a timeline for phasing any such programs out;
- f. For each Graduation and Employment Chart, provide a list of all graduates reported as “Available for Employment” and licensure examination pass rate data, in the following format:

Program Name				
Name of Licensing Agency				
Total Number of Graduates Taking the Exam				
Total Number Graduates Passing the Exam				
Percentage of Graduates Passing the Exam				
<b>DETAIL REPORT</b>				
Graduate Name	Class Start Date	Graduation Date	Took Exam (Y/N)	Passed Exam (Y/N)

- g. For each program which the reported rates of licensure exam passage do not meet the ACCSC benchmark of 70%, provide an updated assessment of the factors impacting the rates of licensure exam passage, how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies;
  - h. For any graduates who have not completed the licensure exam, provide a detailed explanation as to the reasons why the graduate has not taken the exam and in what ways the school is assisting the graduate with complete the exam in the future;
  - i. Any additional information that the school believes will be useful to demonstrate the school’s compliance with licensure pass rate requirements.
2. Educational Technical College must demonstrate that the school applies a fair and equitable refund policy in accordance with the school’s established policy and that the policy is in compliance with all applicable regulations (*Section I (D)(5), Substantive Standards, Standards of Accreditation & Section I (B)(1)(e)(iii), Rules of Process and Procedure, Standards of Accreditation*). The Commission’s Warning Order noted that Educational Technical College did not make clear as to why the school’s refund policy had an allowance for the school’s inability to determine the last date of attendance. Specifically, the last date of attendance was not defined by the daily monitoring described by the school. In response, Educational Technical College provided the school’s refund policy and the corresponding attendance policy. Educational Technical College’s attendance policy states:

*Student’s attendance is monitored on a daily basis by the instructors. Students who are absent on three consecutive days are referred by the instructors to the Guidance Counselors for*

*follow up. Student who are absent for 14 consecutive days without notification to school authorities shall be withdrawn from the financial aid program be will be subject to academic action that **may result** up to a withdrawal from the program.*

Given that Educational Technical College’s attendance policy states that students “[w]ill be subject to academic action that may result up to a withdrawal from the program,” it is unclear if the student is withdrawn from the program after being absent for 14 consecutive days or if the school takes an alternative academic action. The lack of clarity of the school’s policy calls into question whether the school complies with the U.S. Department of Education’s (“the Department”) requirements.

In addition, Educational Technical College’s attendance policy states: “student withdrawals due to absenteeism normally are determined 30 days upon the last day of attendance to an academic activity.” The Commission found that the policy does not promote or ensure adequate student attendance as the school is waiting 30 days to contact the student upon a student last day of attendance to an academic activity before the school determines a withdrawal status. This practice does not promote sufficient levels of student attendance such that the required knowledge, skills, and competencies can be reasonably achieved as required by accrediting standards

Furthermore, in response to the Warning, Educational Technical College provided a Refund Report Summary Sheet for students that were either dismissed or withdrew between January 1, 2018 and May 31, 2018. From the summary sheet, the Commission noted one late refund (student initials LFS), for whom the school issued a refund 30 days after the date of determination. Educational Technical College also provided a narrative regarding students who withdrew from the school prior to receiving Title IV monies, and explained how the school is working with students to continue their studies in Puerto Rico, or when a student relocates to the continental United States. The Commission noted that the school’s policy and processes in this regard may have an impact on the timely issuance of refunds.

Based on the foregoing, the Commission directs Educational Technical College to provide the following:

- a. A revised copy of the attendance policy with clear language regarding the consequences for students who are absent for 14 consecutive days without notification to school authorities.
- b. A revised attendance policy that includes the following:
  - i. The specific consequences for students who are absent for 14 consecutive days without notification to school authorities with the omission of “may” from the policy; and
  - ii. Revisions to the policy that ensure successful student attendance and does not permit a student to be absent for 30 days before the student is withdrawn from the school, but rather a lesser amount of absenteeism.
- c. A revised withdrawal policy removing the statement that if a student is withdrawn from the financial aid program, the student will no longer receive Title IV funds and include the statement as a part of the school’s termination policy.
- d. For students that were either dismissed or withdrew between January 1, 2018 and May 31, 2018, provide the following:
  - i. The Refund Report Summary Sheet;
  - ii. Refund Report Worksheets;

- iii. Individual attendance records to include documentation of approved leave of absences, if applicable; and
  - iv. Copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds.
  - e. An explanation regarding the factors contributing to any late refunds issued by the school during this time period and the corrective action taken by the school, if applicable.
  - d. Any additional information that the school believes will aid in demonstrating compliance with accrediting standards and other regulatory requirements regarding the school’s refund policy and practices.
3. Educational Technical College must demonstrate that the school’s Leave of Absence (“LOA”) policy includes the process to have a leave of absence approved and the reason(s) why a student can request a leave of absence (*Section VII (A)(3), Substantive Standards, Standards of Accreditation, Standards of Accreditation*). Educational Technical College provided the attendance records for the eight students that the school reported in the Refund Report Summary Sheet and noted that four of the eight students were given an approved LOA. Educational Technical College included documentation that the school approved the four LOA’s along with the reasons for the LOA. The Commission noted that the school’s reason for three students’ LOA was stated as “Hurricane Maria”.

In addition, Educational Technical College’s “interruption (Leave of Absence)” policy from the school catalog states:

*The institution may grant a leave of absence to students who demonstrate that they need to interrupt their studies for not more than 180 days for each 12-month period. This time-period can be fractioned into sub-periods according to the student’s circumstances and needs. The student shall request this interruption and obtain the authorization from the Registrar’s Department, prior to the LOA, except in situations where major justifiable reasons have occurred, not in the student’s control. If the student does not return on the previously authorized date, the Institution shall proceed to issue a withdrawal, and apply the corresponding refunds according to the established procedures.*

While the Commission appreciates the impact of Hurricane Maria on students, the Commission found that simply stating “Hurricane Maria” does not indicate the specific reason for the students’ LOA. In one instance the school noted that the reason given for the needed LOA was that the student indicated s/he had “lost my home due to hurricane Maria” and needed “to take care of personal and financial issues, which are affecting my regular attendance.” The Commission found this to be an example of a reasonable explanation for granting an LOA. In the other three cases, without additional documentation from the student, the Commission questions how Educational Technical College appropriately validated the reasons for approving the LOAs. In addition, due to the lack of LOA policy guidelines regarding what constitutes a bona fide reason for approving a leave of absence (i.e., major justifiable reason not in the student’s control), it remains unclear as to whether Educational Technical College is following the school’s official LOA policy.

Based on the foregoing, the Commission directs Educational Technical College to submit the following:

- a. A revised LOA policy that includes more specific criteria that students must meet to take an LOA and the documentation that students are required to provide to the school to support the reason for the LOA.

- b. A list of all students who the school approved an LOA since the submission of the response to the April 4, 2018 Warning Order letter along with specific written details for the LOA and documentation of the reason to support the LOA.

Student Name	Program	Program Start Date	Date of LOA	Reason for LOA	Documentation on file to support LOA	Date student returned to class after LOA, as applicable

- c. Copies of the documentation file to support the reason for the LOA as identified in the chart above.

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**PROBATION REQUIREMENTS:**

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with *Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation*, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with *Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.

**TEACH-OUT PLAN REQUIREMENT**

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an [ACCSC Institutional Teach-Out Plan Approval Form](#) which must be submitted as part of the response for the items listed above.

### **MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:**

Based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and the school's longest program of thirteen months, the maximum timeframe allowed for Educational Technical College to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen months. Thus, the timeframe to achieve compliance begins as of September 2018. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

### **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.

Educational Technical College 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.<sup>2</sup> 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.

Educational Technical College 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 response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before December 21, 2018**. If a response, the required fee,<sup>3</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before December 21, 2018**, 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.

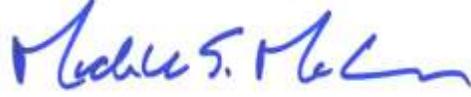
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<sup>2</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting 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](http://www.accsc.org).

<sup>3</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation.

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

Sincerely,



Michale S. McComis, Ed.D.  
Executive Director

c:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Encl: Refund Report Worksheet



## REFUND REPORT WORKSHEET

*A separate worksheet must be completed for each refund made within the time period specified by the Commission.*

Name of student: \_\_\_\_\_ Date of enrollment: \_\_\_\_\_

The maximum number of days for which the school must disburse refunds, as defined in the school's refund policy:	
Based upon the school's refund policy, select (a) or (b) below and enter the date the school used to calculate the number of days required to disburse the refund:	
<b>(a) Last date of attendance</b>	
<b>(b) Date of determination of termination/withdrawal</b>	
Date of refund disbursement:	
The actual number of days between (a) or (b) above and the date the school disbursed the refund:	

Attach to this worksheet a detailed explanation for why the refund was late (if applicable).

<b>Length of program or period of enrollment:</b>	
<b>Percentage of program or period of enrollment completed:</b>	%
<b>Total tuition for program or period of enrollment:</b>	\$
total amount of tuition collected:	\$
percentage of total tuition collected:	%
percentage of collected tuition retained (c):	%
percentage of collected tuition refunded (d):	%
<b>Amount of refund</b>	<b>\$</b>

Attach to the school's submission:

- One copy of the school's withdrawal/refund policy and attendance policy, as it appears in the school's catalog, must accompany the school's submission. If the school uses one or more state refund policies, please attach a copy of each state's refund policy. One copy per state will suffice for the entire Refund Report.
- The Refund Report Summary Sheet for all refunds included in this report.

Attach to this worksheet:

- Copy of the calculation sheet(s) showing how the refund was calculated,
- Copy of the front and the back of the refund check(s) or electronic transmission document(s).

## THE REFUND REPORT WORKSHEET GLOSSARY

**Name of student:** As it appears on the signed Enrollment Agreement.

**Date of enrollment:** The date the Enrollment Agreement was signed.

**Last date of attendance (a):** The last day the student attended class.

**Date of determination of termination/withdrawal (b):** The date the student's enrollment was terminated either by voluntarily withdrawal or by termination by the school.

**Date of refund disbursement:** The date the refund check was processed and disbursed or electronically transmitted (Pell accounts).

**Length of program or period of enrollment:** The total length of the program, or period of enrollment for which tuition is charged, measured in either weeks, months, or clock hours, whichever is most appropriate for refund calculation purposes.

**Percentage of program or period of enrollment completed:** Length of the total program, or period of enrollment for which tuition is charged, completed divided by the amount of the length of the program or period of enrollment for which tuition is charged uncompleted.

**Total tuition for program or period of enrollment for which tuition is charged:** The total tuition cost for the program, or period of enrollment for which tuition is charged. This amount does not include application fees, books, supplies, uniforms, etc., unless those items are completely refundable by the school.

**Total amount of tuition collected:** The amount of refundable monies collected.

**Percentage of total tuition collected:** The percentage of refundable monies collected.

**Percentage of collected tuition retained (c):** The percentage of refundable monies collected that was retained by the school for training received by the student.

**Percentage of collected tuition refunded (d):** The percentage of refundable monies collected that was returned to the student, or to financial aid accounts on behalf of the student, for training which was purchased but not received by the student. Items (c) and (d) should total 100%.

**Amount of refund:** The dollar and cents amount of the refund.