

December 12, 2018

ELECTRONIC DELIVERY

██████████
Director
Bay State School of Technology
225 Turnpike Street
Canton, Massachusetts 02021

School #M054820
Warning Letter

Dear ██████████

At the November 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to defer action on the Application for Renewal of Accreditation submitted by Bay State School of Technology (“BSST”) located in Canton, Massachusetts. Upon review of the June 27, 2018 Commission letter and the school’s response, the Commission voted to place BSST on **Warning** for a subsequent review scheduled for ACCSC’s **May 2019** meeting.¹ The reasons for the Commission’s decision and the Commission’s requirements for BSST to demonstrate compliance are set forth below.

History of the Commission’s Review:

- At the May 2017 Commission Meeting, the Commission reviewed the Application for a Renewal of Accreditation submitted by BSST and voted to defer final action until the November 2017 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards in the areas of Employment Verifications, Refunds, Institutional Assessment and Improvement Planning, Management and Administrative Training, Admissions, Program Advisory Committee, Learning Resource System, Student Services Policy and Procedures, Enrollment Agreement, Faculty Development, Transfer of Credit Policy, and the Capacity to offer Commercial Refrigeration & Air Conditioning (Certificate), Domestic Refrigeration & Air Conditioning (Certificate), and Major Appliance & Basic Electricity (Certificate) programs.
- At the November 2017 Commission Meeting, the Commission reviewed the previous decision to defer final action on the Application for a Renewal of Accreditation submitted by BSST and voted to again defer final action until the November 2018 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards in the areas of Admissions, Refunds, Career Advancement, Program Advisory Committees, Learning Resource System, Enrollment Agreements, Institutional Assessment and Improvement Planning, Faculty Development, Management and Staff Development, Admissions Testing, and Program Names.

November 2018 Review

1. BSST must demonstrate that the school has adequate management and administrative capacity with the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). The Commission is concerned about the school’s inability to demonstrate compliance with accrediting standards after being afforded three (3) opportunities to provide additional documentation, particularly in context of questions regarding the school’s financial structure (see #2).

¹ The accreditation process provides an opportunity for an institution to demonstrate its commitment to continuous improvement. Accordingly, the Commission’s final decision letter on this matter will include an ACCSC Institutional Enhancement Enclosure which lists suggestions deserving the school’s immediate attention and action.

In addition, the Commission reviewed the compliance history of the school during the previous cycles of accreditation and the history of the Commission’s review relative to the most recent Application for Renewal of Accreditation and found the school has not addressed longstanding compliance issues. Specifically, the Commission reviewed the following history:

Review Type and Date	Action
May 2007 Renewal of Accreditation Commission Review	Action – Defer to Demonstrate Compliance in the Following Areas: (1) Faculty Improvement Planning (2) Institutional Assessment and Improvement Plan (3) Learning Resource System Accessibility (4) Admission Documentation (5) Services Ability-to-Benefit Students (6) Consistent Refund Policy Disclosure
November 2007 Renewal of Accreditation Commission Review	Action: Accredited 5 years going forward from February 2007 Reporting Requirement (1) Admission Documentation Institutional Enhancement Enclosure (1) Written Plan for Faculty Improvement
May 2012 Renewal of Accreditation Commission Review	Action: Defer to Demonstrate Compliance in the Following Areas: (1) Verifiability of Records of Initial Employment (2) Timeliness of Refunds (3) Institutional Assessment and Improvement Plan (4) Program Lengths (as approved by ACCSC, not supported by the hours offered during the evening schedule for the Commercial Refrigeration & Air Conditioning, Major Appliance/Domestic Refrigeration & Air Conditioning, and Major Appliance & Basic Electricity). (5) Adequacy of Student Services (6) Program Advisory Committee Meetings
November 2012 Renewal of Accreditation Commission Review	Action: Accredited 5 years going forward from February 2012 Stipulation (1) Timeliness of Refunds

The Commission found that the areas of refunds, program lengths, admissions documentation, institutional assessment and improvement planning, and faculty improvement planning are all areas where the school has been cited previously and which again represent concerns as set forth in this letter. The school must take immediate and focused action in response to this Warning letter to demonstrate the school’s current compliance in the areas cited as well as the school’s capability and capacity to maintain ongoing compliance with accrediting standards.

Given the on-site evaluation team’s concern related to ongoing management and staff professional development, the Commission is interested in the professional development activities that the

school's managers have undertaken to support their understanding of ACCSC's *Standards of Accreditation* (see Item #2 below).²

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

- a. An organizational chart of all administrative and management personnel;
 - b. Position Descriptions for each position included on the organization chart along with a justification as to each individual's qualifications to fulfill their required duties; and
 - c. A description of the steps and strategies the school intends to employ in order to ensure ongoing compliance with accrediting standards. .
2. BSST must demonstrate that management and administrative staff participates in ongoing development and training activities that support their particular roles (*Section I (A) (3), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school's records pertaining to ongoing development and training activities did not include performance evaluations, job descriptions, or evidence of professional development activities since 2011. In response to the TSR, BSST stated that "[t]he school has now incorporated a form to use during performance evaluations that will also include verification of professional development" and provided a blank copy of the aforementioned form, without any evidence to demonstrate that the form has been implemented. As such, the June 8, 2017 Commission letter directed BSST to submit evidence that the form intended to document ongoing development and training activities for management and administrative staff has in fact been implemented.

In response to the June 8, 2017 Commission letter, BSST provided completed forms for [REDACTED]. The Commission noted, however, that the "Academic Year" is blank for all but [REDACTED] and that the school did not provide evidence of the completed activities. Additionally, the Commission noted there was no form for the [REDACTED].

Therefore, in the June 27, 2018 letter the Commission directed BSST to provide the school's policies and procedures regarding ongoing management and administrative staff development, a list of current management and a completed 2018 development plan for each person along with documentation of completed staff development activities for the period of January 1, 2017 to August 1, 2018. In response to the June 27, 2018 Commission letter, the school provided staff development plans for [REDACTED], however, is not listed on the current management and administrative staff). The Commission again noted that the "Academic Year" is blank on all forms except [REDACTED], which enigmatically states "16/17." The Commission also found that the evidence of completed staff development activities provided by the school shows nothing for 2018 with the exception of [REDACTED] who attended workshops in March 2018 and June 2018. Additionally, the Commission noted the response continues to lack a form for [REDACTED] and there is no form for the [REDACTED].

² The Commission's assessment of the school's ability to manage a post-secondary educational institution in compliance with accrediting standards will be heavily influenced by the school's success in demonstrating compliance with the areas cited in this letter.

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

- a. A description of the school's overall management and administrative staff development plan along with the policy and procedures for ensuring that the plan is adhered to and the documentation of activities;
 - b. A list of all current management and administrative staff;
 - c. An individual professional development plan for each member listed in (b.) above for 2018-2019;
 - d. Documentation of all completed staff development activities for each plan listed in (c.) above covering the period August 1, 2018 through February 28, 2019; and
 - e. Any additional information that the school believes will be useful to the Commission showing the school's compliance with ACCSC's requirements regarding ongoing management and administrative staff development.
3. BSST must demonstrate that the school's financial structure is sound, with resources sufficient for the proper operation of the school and the discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). While reviewing the information submitted in response to the June 27, 2018 Commission letter regarding the refund concern, the Commission found that 83% (5 of 6) of the required refunds were paid late (see item #4 below) and all paid on July 27, 2018. In explanation, BSST stated that "refunds were late due to funding availability." The Commission requires the school to have resources sufficient for the proper operation of the school and the discharge of obligations to its students, including making tuition and fee refunds on time in accordance with the school's published policy.

Given this issue, the Commission is concerned that the school lacks such financial resources and as such thus directs BSST to submit the following:

- a. Internally prepared financial statements for eight-months to cover the period of July 1, 2018 to February 28, 2019, prepared in accordance with requirements set forth in ACCSC's [Instructions for the Preparation and Submission of Financial Statements and Related Information](#);³
 - b. A Management Discussion and Analysis narrative examining and explaining the school's current financial condition;
 - c. The school's full fiscal year 2018 budget and a budget-to-actual analysis for the twelve-month period of July 1, 2017 through June 30, 2018;
 - d. The school's 2019 fiscal year budget and a budget-to-actual analysis for the eight-month period of July 1, 2018 through February 28, 2019; and
 - e. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements.
4. BSST must demonstrate that the school describes itself consistently to each accrediting agency, state agency, and federal agency with regard to programs and credentials awarded (*Section I (D)(3), Rules of Process and Procedure, Standards of Accreditation*) and that when a program has not had any enrollments or graduates for one year, the school maintains the capacity to offer the program (*Section IV (E)(6)(f)(i), Rules of Process and Procedure, Standards of Accreditation*). The TSR states that the

³ The Commission noted that BSST has a fiscal year end of June 30 and will also review the school's June 30 2018 financial statements (due in the Commission's office no later than December 31, 2018) in conjunction with the response to this Warning letter.

Commercial Refrigeration & Air Conditioning (Certificate) program, the Domestic Refrigeration & Air Conditioning (Certificate) program, and the Major Appliance & Basic Electricity (Certificate) program were not operational at the time of the on-site evaluation. In response to the January 9, 2017 TSR, BSST stated that the school planned to continue offering the programs but did not provide any specific evidence to demonstrate the capacity to continue to offer the programs or any clear timeframe for when the next class start might occur. As such, in the June 8, 2017 letter the Commission directed BSST to provide a comprehensive explanation and demonstrate how the school is capable of offering the aforementioned programs. In response to the June 8, 2017 Commission letter, BSST provided the following explanation:

The aforementioned programs are taught here at the school as a phase of ALL Approved Programs.

Phase 1 is Major Appliance & Basic Electricity (4 months days or 6 months nights).

Phase 2 is Domestic Air Conditioning & Refrigeration (4 months days or 6 months nights).

Phase 3 is Commercial Air Conditioning & Refrigeration (4 months days or 6 months nights)

APPROVED PROGRAMS

Program 1 is phase 1.

Program 2 is phase 2.

Program 3 is phase 3.

Program 4 is phase 1 plus phase 2 (8 months days or 12 months nights)

Program 5 is phase 2 plus phase 3 (8 months days or 12 months nights)

Program 7 is phase 1 plus phase 2 plus phase 3 (12 months days 18 months' nights)

The programs are always in session, and the School has always had the equipment, facilities, faculty, curriculum and learning resource systems. Since each phase is always being taught someone could enroll for a single phase as long as they have met the admissions requirements.

While the Commission agrees that the school has three (3) basic programs which the school combines to create longer programs, the Commission found discrepancies when comparing the school's explanation; the Commission approvals; the school's 2017-2018 Catalog; the school's blank Enrollment Agreement ("EA") with no revision date; and enrollment agreements (February 2012 revision date) provided for students who enrolled between March 1, 2017 and July 31, 2017 submitted as part of the response. The Commission found that the response raised the following concerns:

- The school appeared to be awarding credit hours for programs that are approved by ACCSC as clock-hour only programs;
- The program names are not consistent between ACCSC's approvals and the school's February 2012 Enrollment Agreement, the Enrollment Agreement without a revision date, and the 2017-2018 catalog; and
- The school is not consistently applying admissions requirements to all programs.

Therefore, in the June 27, 2018 Commission letter, the Commission directed the school to submit a roster of all students enrolled between January 1, 2018 and June 30, 2018 by program; ACCSC and state approvals for the school's programs; the school's Program Participation Agreement with the U.S. Department of Education ("the Department") including the school's approved programs listed; an explanation for awarding credits; an explanation for how the school planned to ensure consistent program names with the Commission, the State of Massachusetts, and the Department; and updated enrollment agreement, catalog and advertising that demonstrates accurate program names.

In response to the June 27, 2018 Commission letter, BSST submitted ACCSC and state approvals for the school’s programs; an explanation for awarding credits; and updated enrollment agreement, catalog and advertising. However, in comparing the information provided, the Commission continued to find discrepancies between the approvals despite the school’s assessment that “BSST has corrected all program name discrepancies to match those on the Commissions (*sic*) Approved Programs.” Specifically, the discrepancies are as follows:

Commission Approval (Clock-Hours, Credit-Hours)	State Approval (Clock-Hours, Credit-Hours)	BSST June 7, 2018 Response	September 2018 Revised Catalog Course Outline (Pages 4-5)	September 2018 Revised Catalog Program Length (Pages 5-7)	Updated Blank Enrollment Agreement No Revision Date	Specific Concerns
Major Appliance & Basic Electricity (360 Clock-Hour, 0 Credit-Hours)	Not Included in Response	Program 1 (Phase 1)	“Program 1” (360 Clock Hours / 90 Independent Study Hours)	Program 1 – Major Appliances and Basic Electricity	Program 1 – Major Appliances/Basic Electricity	State approval not yet reviewed
Domestic Refrigeration & Air Conditioning (360 Clock-Hour, 0 Credit-Hours)	Not Included in Response	Program 2 (Phase 2)	“Program 2” (360 Clock Hours / 90 Independent Study Hours)	Program 2 – Domestic Refrigeration & Air Conditioning	Program 2 – Domestic Refrigeration & Air Conditioning	State approval not yet reviewed
Commercial Refrigeration & Air Conditioning (360 Clock-Hour, 0 Credit-Hours)	Not Included in Response	Program 3 (Phase 3)	“Program 3” (360 Clock Hours / 90 Independent Study Hours)	Program 3 – Commercial Refrigeration & Air Conditioning	Program 3 – Commercial Refrigeration & Air Conditioning	State approval not yet reviewed
Major Appliance/ Domestic Refrigeration & Air Conditioning (720 Clock-Hour, 36 Credit-Hours)	Program 4 Days – Major Appliances/ Domestic Refrigeration & Air Conditioning (720 Clock Hours 24 Credit Hours)	Program 4 (Phases 1,2)	“Program 4” (720 Clock Hours / 180 Independent Study Hours / 36 Credit Hours)	Program 4 – Major Appliances and Domestic Refrigeration & Air Conditioning	Program 4 – Major Appliances/Basic Electricity and Domestic Refrigeration & Air Conditioning	<ul style="list-style-type: none"> Programs 1 and 2 are not approved for credit hours but Program 4, which is made up of Programs 1 and 2, is approved for credit-hours The Approved Credit Hours do not match between ACCSC and the state
Domestic & Commercial Refrigeration & Air Conditioning (720 Clock-Hour, 36 Credit-Hours)	Program 5 Days – Domestic Ref. & AC and HVACR (720 Clock Hours 24 Credit Hours)	Program 5 (Phases 2,3)	“Program 5” (720 Clock Hours / 180 Independent Study Hours/ 36 Semester Hours)	Program 5 – Domestic and Commercial Refrigeration & Air Conditioning	Program 5 – Domestic and Commercial Refrigeration & Air Conditioning	<ul style="list-style-type: none"> Programs 2 and 3 are not approved for credit hours but Program 5, which is made up of Programs 2 and 3, is approved for credit-hours The Approved Credit Hours do not match between ACCSC and the state
Major Appliance & Domestic & Commercial Refrigeration & Air Conditioning (1080 Clock-Hour, 54 Credit-Hours)	Program 7 Days Major Appliances/ Domestic Refrig/ Commercial HVACR (1080 Clock Hours 36 Credit Hours)	Program 7 (Phases 1,2,3)	“Program 7” (1080 Clock Hour / 270 Independent Study Hours / 54 Credit Hours)	Program 7 – Major Appliances, Domestic and Commercial Refrigeration & Air Conditioning	Program 7 – Major Appliances/Basic Electricity and Domestic & Commercial Refrigeration & Air Conditioning	<ul style="list-style-type: none"> Programs 1, 2 and 3 are not approved for credit hours but Program 7, which is made up of Programs 1, 2 and 3, is approved for credit-hours The Approved Credit Hours do not match between ACCSC and the state
Electronics Technician (1080 Clock-Hour, 54 Credit-Hours)	Program 8 Days Electronics Technician (1080 Clock Hours 36 Credit Hours)	N/A	“Program 8” (1080 Clock Hours / 270 Independent Study Hours / 54 Credit Hours)	Program 8 – Electronics Technician	Program 8 – Electronic Technician	The Approved Credit Hours do not match between ACCSC and the state

Overall, in reviewing all the information from the most recent response, the Commission remains concerned with the following:

- The September 2018 revised catalog lists the following under Course Outline:

COURSE OUTLINE

The school offers training in four areas of study: Major Appliances/Basic Electricity - (360 Clock Hours plus **90 Independent Study Hours** - Full Time Days or Part Time Evenings); Domestic Refrigeration & Air Conditioning - (360 Clock Hours plus 90 Independent Study Hours - Full Time Days or Part Time Evenings); Commercial Refrigeration & Air Conditioning - (360 Clock Hours plus **90 Independent Study Hours** - Full Time Days or Part Time Evenings); and Electronics Technician - (1,080 Clock Hours plus **270 Independent Study Hours** - Full Time Days or Part Time Evenings).(emphasis added).

The Commission questioned the school's use of the term "Independent Study." *Section II (A)(11) Substantive Standards, Standards of Accreditation* set forth the requirements for offering independent study credits including that Independent Study may only be offered within a credit hour program and a school may not allow more than 10% of any program to be offered via Independent Study. If BSST's intention was to refer to "Outside Work," then the Commission reminds the school that Outside Work is only recognized in credit hour programs, and not in Clock Hour Programs.

- The Major Appliance/ Domestic Refrigeration & Air Conditioning (Certificate) [Program 4], Domestic & Commercial Refrigeration & Air Conditioning (Certificate) [Program 5], and Major Appliance & Domestic & Commercial Refrigeration & Air Conditioning (Certificate) [Program 7] programs are approved for awarding credit hours ("Credit Hour Programs"). The base programs that make up the Credit Hour Programs, namely the Major Appliance & Basic Electricity (Certificate) [Program 1], Domestic Refrigeration & Air Conditioning (Certificate) [Program 2], and Commercial Refrigeration & Air Conditioning (Certificate) [Program 3] ("Clock Hour Programs"), are not offered in credit hours – clock hour only. Specifically, the Commission is interested in whether:
 - Students from the Clock Hour Programs attend the same classrooms as students from the Credit Hour Programs and the school's procedures for this arrangement; and
 - Students would be given credit hours for courses taken as part of a clock-hour-only program (i.e., the response does not make clear the school's policy for a scenario if a student signs an enrollment agreement for one of the Clock Hour Programs and then decides to move to a Credit Hour Program).
- The course outline, as listed in the September 2018 catalog, does not appear to include individual courses within each of these programs. However, the catalog does clearly indicate that there are distinct areas/objectives and competencies to be achieved. For example, the Major Appliance & Basic Electricity (Certificate) [Program 1] covers basic electricity, washing machines, dishwashers, microwaves, ovens, etc. The Commission is concerned that without individual courses (and therefore course assessments and grades) the school may not be in a position to assess mastery of competencies for each area.
- The Massachusetts state approval submitted as part of the response for "Program 14 Eves Domestic Refrigeration & AC and Commercial HVACR" does not match the evening descriptions in the catalog which refer only to programs numbered 1, 2, 3, 4, 5, 7, and 8.
- Given that the school did not submit information regarding the program approvals with the Department, the response is not sufficient to demonstrate consistency within those approvals.

With the continued discrepancies and concerns raised along with the lack of student enrollments for over a year in the Major Appliance & Basic Electricity (Certificate) [Program 1], Domestic

Refrigeration & Air Conditioning (Certificate) [Program 2], and Commercial Refrigeration & Air Conditioning (Certificate) [Program 3], the Commission questioned whether the school has appropriate policies, procedures, and capacity for the operation of these programs in compliance with accrediting standards.

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

- a. Student information by program in the chart below:

Program Name	Most Recent Start Date	Most Recent Graduation Date	Number of Currently Enrolled Students
Major Appliance & Basic Electricity [Program 1]			
Domestic Refrigeration & Air Conditioning [Program 2]			
Commercial Refrigeration & Air Conditioning [Program 3]			
Major Appliance/ Domestic Refrigeration & Air Conditioning [Program 4]			
Domestic & Commercial Refrigeration & Air Conditioning [Program 5]			
Major Appliance & Domestic & Commercial Refrigeration & Air Conditioning [Program 7]			
Electronics Technician [Program 8]			

- b. A copy of the state approval for each program listed in the chart in (a.) above;
- c. A copy of the Commission’s Allocation of Hours for Clock Hour Program or Outline of a Non-Degree Program⁴, as applicable, for each program listed in the chart in (a.) above;
- d. If the Allocation of Hours for Clock Hour Program or Outline of a Non-Degree Program do not list individual courses within the programs, an explanation as to how the school assesses and grades mastery of competencies for each area;
- e. A copy of BSST’s Eligibility and Certification Approval Report (“ECAR”) including the school’s list of approved programs;
- f. An explanation of the school’s policy and procedures for managing the education if/when a student from the Clock Hour Programs sit in the same classrooms as students from Credit Hour Programs;
- g. An explanation of the school’s policy and procedures for if/when a student signs an enrollment agreement for a Clock Hour Program and then decides to move a Credit Hour Program; whether the student be given credit hours for courses taken as clock hour only;
- h. An explanation for how the school plans to ensure the approved program name and credit hours exactly match for each program between the Commission, State of Massachusetts, and Department of Education including, as needed, the appropriate Commission application (i.e., Non-Substantive Modification Application, Substantive Modification Application, New Related Program Application, etc.);

⁴ The Allocation of Hours for Clock Hour Programs and Outline of a Non-Degree Program can be found on the Commission’s website www.acsc.org

- i. An updated enrollment agreement to reflect the accurate programs and program names;
 - j. An updated catalog to reflect the accurate program names and consistent descriptions of outside work hours;
 - k. All current advertising demonstrating accurate programs and program names; and
 - l. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements.
5. BSST must demonstrate that the school adheres to its established refund policy (*Section I (D)(5), Substantive Standards, Standards of Accreditation*), and that the refund policy is disclosed consistently in the catalog and enrollment agreement and the language in the catalog and the enrollment agreement are not in conflict (*Section I (D)(6) Substantive Standards, Standards of Accreditation*). At issue is that BSST is not making refunds in a timely manner and in accordance with the school's policy and that the refund is not consistently and clearly disclosed.

In response to the on-site evaluation team's finding regarding late refunds, BSST indicated that the school updated its policy and implemented a new procedure to ensure refunds are processed in a timely manner and submitted a copy of one (1) student ledger to demonstrate implementation. In order to determine whether the school fully implemented the new policies and procedures, the June 8, 2017 Commission letter directed BSST to submit the refund policy along with a refund report for all refunds between March 1, 2017 and July 31, 2017.

In response to the June 8, 2017 Commission letter, BSST submitted a copy of the school's refund policy. In reviewing the submitted policy, the Commission noted that "[r]efunds due to Title IV will be made within 45 days of termination" but if "a withdrawing student is entitled to a refund under Massachusetts State Refund Policy, the refund will be calculated using the student's last day of attendance and the check will be mailed to the student within 60 days of that date." The Commission questioned why there is a discrepancy between the two dates. In addition, the Commission found that the blank enrollment agreement (the version with no revision date) no longer refers to 45 days but only to 60 days.

Additionally, in response to the June 8, 2017 Commission letter, BSST submitted documentation for all refunds between March 1, 2017 and July 31, 2017, including two (2) students [REDACTED]. The "Memo to File" for [REDACTED] indicates that no refund was due and the documentation for [REDACTED] indicates that the refund was due by July 23, 2017 and paid on August 21, 2017. In explanation, BSST stated that "[s]tudent services was not notified right away by the instructor, that he had been missing for the five consecutive days, which is the point that if a student cannot be reached a drop due to loss of contact is done."

Given the concerns and continued late refunds, the June 27, 2018 Commission letter directed BSST to submit an explanation for any discrepancies in the number of days for processing refunds and refund information for all students who were either dismissed or withdrew between January 1, 2018 and June 30, 2018. In response to the June 27, 2018 Commission letter, the school stated that:

BSST must comply with both Massachusetts State Refund Policy requirements as well as Title IV requirements. These policies must also both be published on our enrollment agreement. BSST will meet the Title IV requirements first to meet the 45 days and the Massachusetts State Refund requirement second.

However, in reviewing the refund policy as listed in the September 2018 Catalog, the refund policy continues to state both “[r]efunds due to students will be made within 60 days of termination” and “[r]efunds due to Title IV will be made within 45 days of termination.” However, the refund policy does not clearly indicate that the 60 day requirement only applies in instances when the state requirements are applied.

Additionally, the refund policy as applied to students who return from a Leave of Absence does not match between the September 2018 Catalog and updated enrollment agreement provided. Specifically, the catalog states that in cases of “a school approved ‘Leave Of Absence,’ the refund will be calculated based on the student’s last date of attendance and the check will be mailed to the student within 60 days of that date” but the enrollment agreement states the refund “will be calculated based on the student’s last date of attendance and the check will be mailed to the student within 60 days of the *date of termination* (emphasis added).”

Further, a review of the school’s policies and procedures indicates that the school utilizes the following policies:

- For Title IV refunds the due date is within 45 days of termination;
- For Massachusetts Refunds the due date is within 60 days of the last date of attendance ; and
- The attendance policy that states: students will be subject to automatic termination from the program after missing five (5) consecutive days of class when the school is not able to contact a student and the student does not contact the school.

The Commission remains confused as to why the school’s policies utilize different calculations and how this information is clearly communicated to students. Based on the policies listed above and the information provided on students who withdrew between January 1, 2018 and June 30, 2018, the Commission noted the following:

Student Name	Start Date	Last Date of Attendance	Date of Determination of Withdrawal / Termination	Number of Days Between Last Date of Attendance and Date of Determination	Title IV Refund Due Date	Massachusetts Refund Due Date	Date Refund Issued
██████████	12/20/2017	5/21/2018	6/13/2018	23	7/28/2018	7/20/2018	7/27/2018
██████████	12/20/2017	5/16/2018	5/30/2018	14	7/14/2018	7/15/2018	7/27/2018
██████████	9/5/2017	5/14/2018	6/26/2018	43	8/10/2018	7/13/2018	7/27/2018
██████████	9/5/2017	10/31/2017	5/14/2018	195	6/28/2018	12/30/2017	7/27/2018
██████████	12/20/2017	6/18/2018	6/18/2018	0	8/2/2018	8/17/2018	7/27/2018
██████████	9/5/2017	2/28/2018	3/5/2018	5	4/19/2018	4/29/2018	7/27/2018

The Commission found the highlighted dates above indicate late refunds based upon the school’s stated policies. In addition, the Commission is concerned that four (4) of six (6) dates of determination appear to exceed the school’s policy on missing five (5) consecutive days of class. Additionally, the school’s “funding availability” explanation (see item #2 above) does not provide any assurance that BSST will refund monies in a timely manner moving forward.

Based on the foregoing, the Commission determined that additional information is necessary for BSST to demonstrate consistent implementation of the school’s updated refund policy and as such directs BSST to submit the following:

- a. A copy of the school’s refund policy as listed in the catalog;
- b. A copy of the school’s refund policy as listed on the enrollment agreement;

- c. An explanation for the discrepancy between the “Leave of Absence” refund policy found in the September 2018 catalog and the refund policy found on the blank enrollment agreement form with no revision date;
 - d. An explanation for why the dates of determination appear to exceed the school’s policy of automatic termination after missing five (5) consecutive days of class for the students in the chart above;
 - e. An ACCSC Refund Report⁵ for all refunds issued to students who were either dismissed or withdrew between July 1, 2018 and February 28, 2019 to include the enclosed the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records to include documentation of approved leave of absences (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds;
 - f. An explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school’s refund policies; and
 - g. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding the school’s refund policy or practices.
6. BSST must demonstrate that the school determines that an applicant meets the school’s admissions requirements and that the school secures documentation to demonstrate that each applicant meets all admission requirements prior to enrollment (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school allows applicants to attend classes for 30 days without having submitted proof of high school graduation or recognized equivalent. In response to the TSR, BSST asserted that the school “no longer allows” applicants to attend classes without submitting proof of high school graduation but did not provide any evidence or documentation to support this assertion. Therefore, in the June 8, 2017 Commission letter, the Commission directed BSST to submit a copy of the school’s revised admissions policy; a detailed description of the school’s internal admissions procedures; and a roster with admissions documentation for all students admitted between March 1, 2017 and July 31, 2017.

In response to the June 8, 2017 Commission letter, BSST provided a copy of the school’s admission policy as published in the catalog. In reviewing the policy, the Commission found that the catalog and enrollment agreement allow for late registration to be made within the first thirty (30) hours of the program. It was unclear from the documentation submitted whether a student would be considered a late registration and admitted even if the student has not secured proof of high school graduation.

In addition, upon review of the backup documentation provided for the students admitted between March 1, 2017 and July 31, 2017, the Commission found that two (2) of the eight (8) enrollment agreements, [REDACTED], appear to have been executed after the listed program start date. Additionally, [REDACTED] did not initial by the “acknowledgement statement” and the proof of high school graduation is dated September 12, 2017, over five (5) months after his start date of May 1, 2017.

⁵ Please remove or redact any student personally identifiable information (e.g., social security numbers, dates of birth, etc.), that information). Where possible (e.g., Refund Report Summary Sheet), please use Student ID#s instead of student names. In cases where documents cannot be altered (e.g., enrollment agreements, ledger cards, refund payments, etc.) please redact the student personally identifiable information.

As such, in the June 27, 2018 Commission letter, the Commission directed BSST to submit the school's late registration policy along with documentation for any student utilizing this policy and a roster of students admitted between January 1, 2018 to June 30, 2018 along with documentation demonstrating each student was properly admitted in accordance with the school's admissions policy. In response to the June 27, 2018 Commission letter, BSST provided a copy of the school's late registration policy that states:

Application for late registration may be made within the first thirty (30) hours of the Program. However, the applicant must make swift and consistent effort to make up his or her missed time in an approved make up session within two weeks of the date of enrollment. All applications for late registration are subject to the approval of the Director of Education, and such approval will take previous background and experience into consideration.

In addition, the school identified two students who utilized the late registration policy, however, BSST also stated:

They made up their time in the afternoons and on Thursdays. Due to the class being hands on learning requirement this had to be done 100% in house with no take home work. This extended the amount of time it took to complete, to three weeks instead of two.

The Commission questioned a) why BSST allowed these students to start if the students required more than the allowed two (2) week time period per the school's policy to complete the missed work and b) why the policy only allows for a two (2) week period if in fact it could take students longer than that time frame. In addition, the Commission noted that the attendance records for the "two (2) weeks of Basic Electricity" course indicate that these two (2) students completed the course concurrently with the enrolled program even though the Basic Electricity course appears to be an admissions requirement and, therefore, should be completed prior to enrollment agreement being accepted by the school official. Further, the school submitted documentation showing that the two (2) students completed their assessment on May 24, 2018, after the start date of May 1, 2018.

Additionally, in reviewing the admissions documentation, the Commission noted the following concerns:

- Proof of high school graduation was received after the enrollment agreement was signed and accepted by the school official for 36% (5 of 14) students;
- The clock hours as listed on the completed enrollment agreements does not match the ACCSC approved clock hours for the program;
- The two (2) week basic electricity class that appears to be listed as an admissions requirement is also listed as on the enrollment agreement as a separate required section but does not appear to be approved by the Commission as part of the program; and
- All students submitted completed the assessment that appears to be an admissions requirement after the enrollment agreement was accepted and signed by the school official.

Due to the continued discrepancies and concerns pertaining to the admissions policy, procedure, and requirements, the Commission directs BSST to submit the following:

- a. An explanation as to why the school permitted the two (2) students to complete the make-up time in three (3) weeks instead of two (2) as listed in the school's policy;

- b. An explanation as to how students could take the Basic Electricity course concurrently with the enrolled program when the Basic Electricity course appears to serve as an admissions requirement;
- c. An explanation as to why the clock hours listed on the completed enrollment agreement do not match the ACCSC approved clock hours;
- d. The school’s admissions policy along with the school’s late registration policy as published in the catalog;
- e. A roster of all students admitted to BSST between December 1, 2018 and February 28, 2019 with the following information:

Student Name	Program	Start Date	Date Enrollment Agreement was Signed by the School	Date Enrollment Agreement was Signed by the Student	Date Evidence of GED or Proof of High School Graduation was Received	Date Student Completed Assessment, if applicable

- f. Documentation demonstrating that each student was properly admitted in accordance with the school’s admissions policy to include: copies of enrollment agreements and admissions documentation, and evidence of high school completion or its equivalent for each student;
 - g. A justification for any student who was admitted utilizing the school’s late registration policy;
 - h. Documentation to demonstrate any student utilizing the late registration policy completed the missed time in an approved make up session within two weeks of the date of enrollment; and
 - i. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
7. BSST must demonstrate that admissions documentation for students from foreign countries is translated and certified to be at least equivalent to the credential required by the school in its admission criteria (e.g., a U.S. high school diploma) (*Appendix V, Admission Documentation, Standards of Accreditation*). The on-site evaluation team found that the school had no mechanisms in place to translate and certify that foreign credentials are the equivalent of a U.S. High School diploma. As such, in the June 8, 2017 Commission letter, the Commission directed BSST to submit a detailed description of the school’s internal admissions procedures for securing all admissions documentation. In response, BSST stated the following:

A prospective student attends an admissions visit which consists of an interview (the confidential questionnaire is completed at that time), a tour is given and then the Entrance Exam is taken and scored. A financial aid appointment is then scheduled and a checklist of paperwork to bring to that appointment is given. At that time the high school verification is requested to be brought to the school. If it is noted that it is a foreign diploma a list of agencies that can translate the diploma is given.

In addition, BSST provided a list of six (6) “Translation Services.” However, BSST’s response did not include a comprehensive description of the school’s process including how a prospective student would be aware of the process; whether the school or the student generates the process; a timeline for the process; who pays for the translation; whether the translation is provided directly to the school or to the student; and what is the process if a student utilizes a translation service not listed. As such, the June 27, 2018 Commission letter directed the school to provide this information along with

documentation demonstrating a translated foreign education documents and certifications of equivalency for students from August 1, 2017 to June 30, 2018.

In response to the June 27, 2018 Commission letter, BSST provided a copy of the school's "Procedures for Foreign Education Documents" which states that if a foreign high school diploma has been translated, then the students should "bring all documentation for that to the appointment." The procedures also state that if a document has not been translated, then the school will provide the student with a list of translation agencies and that once translated and certified the student receives should "bring it to the school as quickly as possible." In addition, the school provided documentation for two (2) students with foreign documents. In reviewing the documentation submitted, the Commission noted while the foreign documents are translated for [REDACTED], they do not appear to have been evaluated for equivalency to a U.S. high school diploma.

Therefore, because of the importance of the documentation being both translated and certified as being equivalent to a U.S. high school diploma, the Commission determined that additional information is necessary in order to ascertain the school's compliance with accreditation standards in the area of admissions requirements. Accordingly, BSST must submit a roster of all students admitted to BSST between August 1, 2018 and February 28, 2019 with translated foreign education documents and certifications of equivalency for any foreign student was admitted to the school.

8. BSST must demonstrate that the school engages in comprehensive institutional assessment and improvement benchmarking and implementation planning (*Section I (B)(2), Substantive Standards, Standards of Accreditation*). In response to the TSR, BSST provided a copy of the school's institutional assessment and improvement plan along with an outline of improvement activities to be discussed yearly; however, the school's plan continued to lack measurable strategic goals, assessment of operations or any evidence of the implementation of improvement activities in any areas required by accreditation standards. Thus, the June 8, 2017 Commission letter directed BSST to submit an updated plan for all areas and include measurable goals to assess ongoing progress along with documentation of activities.

In response to the June 8, 2017 Commission letter, BSST provided an updated plan. In reviewing the updated plan, the Commission found that the school's plan again continues to lack improvement planning in all areas, specifically, fiscal condition and budget; faculty and staff development; and student achievement outcomes, and the plan continues to lack measurable strategic goals. In addition, BSST did not submit evidence of implementation of improvement activities in any areas as required by the accreditation standards.

As such, the June 27, 2018 Commission letter directed the school to submit an updated plan and documentation of activities. In reviewing the response to the June 27, 2018 Commission letter, the Commission found that the plan continues to lack measurable benchmarking and strategic goals. Specifically, it appears the school's plan is from a meeting held on June 22, 2017 and includes the headings of Management/Administration, Administration, Facilities, Academic, and Community Involvement. In addition, it is unclear if any of the information in the submitted plan occurred in 2018 or will occur in an ongoing manner. Additionally, the school did not provide any documentation of institutional improvement activities.

Based on the forgoing, BSST must submit the following:

- a. An updated plan to reflect improvement planning in the areas of management, fiscal condition and budget, administrative policies and practices, student support services, faculty and staff

development, educational program curricula, learning resource system, facilities, and student achievement outcomes, including measurable goals to assess the ongoing progress of the school in each above-listed area of school operations;⁶

- b. Documentation of institutional improvement activities, as applicable, as listed in the updated plan; and
 - c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements regarding institutional improvement planning.
9. BSST must demonstrate that faculty members engage in ongoing development of teaching skills as part of the school's plan for faculty improvement (*Section III (B)(4), Substantive Standards, Standards of Accreditation*). In response to the TSR's finding that the school did not provide evidence that all faculty engage in ongoing training in instructional methods and teaching skills, BSST implemented a faculty development plan form and provided a blank copy of the faculty development plan form with no evidence to demonstrate implementation. As such, the June 8, 2017 Commission letter directed BSST to submit copies of completed faculty development forms for all of the school's faculty members. In response to the June 8, 2017 Commission letter, BSST provided copies of the completed faculty development plans without any documentation of the implemented plans.

Therefore, the June 27, 2018 Commission letter directed BSST to provide the school's policy and procedure regarding ongoing faculty development and a list of current faculty members along with documentation of completed 2017 activities and a completed 2018 development plan for each faculty member. In response to the June 27, 2018 Commission letter, the school stated that "BSST faculty will have two training per year for faculty development...[o]ne will be an in house training and the other a training of the instructor's choice." In addition, the school provided a 2017 plan for each faculty member, with the exception of [REDACTED], that includes a first meeting in June 2017 but no second meeting. Additionally, BSST provided a sign-in sheet for a training titled "Teachers Skill in the Digital Age and Personalized Pd for teachers" and an August 1, 2017 Whirlpool "Service Matters" sign-in sheet as documentation of the 2017 plans. However, the sign-in sheet for Teachers Skill in the Digital Age and Personalized Pd for teachers" lists both a March 28, 2018 date and a March 18, 2017 date and does not indicate that all instructors were in attendance. The sign-in sheet for "Service Matters" includes 24 students but only four (4) staff. Further, the school did not submit a completed 2018 faculty development plan for each instructor.

Therefore, the Commission directs BSST to provide the following:

- a. A narrative description of the school's policy and procedure regarding ongoing faculty development along with how the school plans to complete faculty development plans and maintain documentation of faculty development plans;
- b. A list of all current faculty members by program;
- c. A completed 2019 faculty development plan for each member listed in (b.) above;
- d. Documentation of the completed faculty development activities for each plan listed in (c.) above covering the period August 1, 2018 through February 28, 2019;

⁶ Please note that the Commission recommends reviewing the "Institutional Assessment and Improvement Planning/Implementation" Monograph Series publication available on the Commission's website. This brochure explains why schools need an assessment and improvement process, how to conduct each step in the process, and how to use the process to meet external demands and internal needs for continuous performance improvement.

- e. A completed 2019 faculty development plan for each member listed in (b.) above; and
- f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with ACCSC's requirements regarding ongoing faculty development.

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*). Please provide a copy of the notice given to students in the school's response (include this documentation along with the attestation required below).

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.

BSST 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.⁷ 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.

BSST 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 Electronic Submission 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.

⁷ 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.

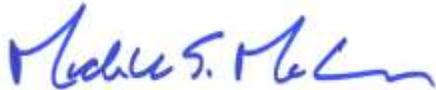
As stated in the [July 1, 2016 Accreditation Alert](#), at the Commission's discretion a \$500 processing fee is assessed when a school is placed on Warning. Accordingly, the school will receive an invoice, under separate cover, in the amount of \$500. The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before March 14, 2019**.

If a response, the required fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before March 14, 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