

December 13, 2018

ELECTRONIC DELIVERY

██████████
Director

California Career School
1100 Technology Circle
Anaheim, California 92805

School #M055906
Warning

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At the November 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation and the Application for a Satellite Location submitted by California Career School (“CCS”) located in Anaheim, California. Upon review of the August 20, 2018 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to place CCS on **Warning** with a subsequent review scheduled for ACCSC’s May 2019 meeting. Additionally, in accordance with *Section VII (R)(5), Rules of Process and Procedure, Standards of Accreditation*, the Commission requires the **immediate cessation of new enrollments at CCS’s Oceanside, California and Twentynine Palms, California locations** until such time as the school receives Commission approval to operate the locations as satellite campuses of the Anaheim main school. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

Background

As part of its consideration of the school’s renewal application and satellite location applications, the Commission considered its previous review of the school’s satellite locations as part of the school’s most recent renewal of accreditation in 2015. According to the Commission’s records, in May 2016 the Commission considered the school’s Request for a Waiver of an Accreditation Standard or Policy and voted to allow CCS to submit Applications for a Satellite Location for the school’s two training facilities located by the military bases in Oceanside, California and Twentynine Palms, California. In addition, the Commission directed an on-site evaluation to the main campus and each satellite location to determine the school’s ability to maintain compliance with accrediting standards at each location. In a letter dated June 15, 2016, the Commission informed CCS that it would consider the on-site evaluation team findings prior to making a determination regarding the waiver request to allow the school to operate the facilities at Oceanside and Twentynine Palms as satellite locations even though the locations are a considerable distance from the school’s Anaheim location.

At the Commission’s February 2018 meeting, the Commission reviewed the school’s Application for a Satellite Location for the Oceanside, California location and requested additional information that was submitted by CCS on March 13, 2018, which was forwarded it to the on-site evaluation team prior to the March 21-22, 2018 on-site evaluation.

According to the TSR,

The on-site evaluation team noted that the school continues to operate the contract training facility at Twentynine Palms, but has not submitted an application for a satellite and/or an application for a branch campus to include the facility in the scope of the school’s accreditation. As such, the on-site evaluation team did not visit the Twentynine Palms location; however, based on the information provided to the onsite evaluation team, the number of students trained at that location exceeds enrollments at the Anaheim location and proposed satellite location in Oceanside (See Team Findings). Additionally, a review of the compliance history of the school during the previous

cycle of accreditation indicates that the school does not appear to have addressed longstanding compliance issues (See Team Findings).

Review Type and Date	Area of Compliance Concern	Current Status
<i>March 9, 2011 Commission Deferral Letter Application for Renewal of Accreditation</i>	<i>Accuracy of data reported on the Graduation and Employment Charts submitted with 2010 Annual Report</i>	<i>See Team Finding #10 & #11</i>
<i>March 9, 2011 Commission Deferral Letter Application for Renewal of Accreditation</i>	<i>Appropriate student services</i>	<i>See Team Finding #5 & #6</i>
<i>March 9, 2011 Commission Deferral Letter Application for Renewal of Accreditation</i>	<i>Program Advisory Committees</i>	<i>N/A</i>
<i>September 7, 2011 Commission Letter with Stipulation Application for Renewal of Accreditation</i>	<i>Appropriate student services</i>	<i>See Team Finding #5 & #6</i>
<i>December 4, 2012 Commission Letter with Stipulation Unannounced On-Site Evaluation</i>	<i>Admissions documentation for students from a foreign country is translated and certified by a third party</i>	<i>See Team Finding #8</i>

Furthermore, there appears to be a lack of attention to detail with regards to adhering to the Standards of Accreditation on an ongoing basis as revisions are approved and disseminated. For example, California Career School used an incorrect clock to credit hour conversion, not including the correct calculation for out of class work in program outlines because the school used an outdated ACCSC Profile of Clock Hour to Credit Hour Conversion form that was revised in 2012 (See Team Findings).

The August 20, 2018 TSR and the school’s response to that report were considered by the Commission at its November 2018 meeting.

November 2018 Review and Action

1. CCS must demonstrate that the school has adequate management and administrative capacity to operate a postsecondary accredited school and accepts its obligation to demonstrate continuous compliance with the *Standards of Accreditation (Section I (E)(1), Rules of Process and Procedure; Section I (A)(1), Substantive Standards, Standards of Accreditation)*. Overall, the Commission expressed concern regarding the significant number (19) and comprehensive nature of the team’s findings captured in the TSR, and that despite the school having an opportunity to respond to these findings, the Commission continues to have a significant number (16) of compliance concerns captured in this Warning letter. In the Commission’s experience as an institutional accrediting body, the high number of outstanding compliance findings is not typical by any means for any institution seeking renewal accreditation from ACCSC, and raises questions as to the adequacy of the school’s management and administrative capacity (*Section I (A)(1)(c), Substantive Standards, Standards of Accreditation*). According to the TSR, on-site evaluation team found that based on the review of the school’s compliance history (see excerpt above), several compliance issues continue to be of concern, notably graduation and graduate

employment documentation, student services, and admissions. In response to this finding, the school provided a summary of how it responded to previous findings of non-compliance dating back to 2011 and 2012. The Commission took note of the school's brief narrative response and did not find that CCS providing any compelling information or supporting documentation to show how the school is operating in accordance with accrediting standards and did not demonstrate that the school has demonstrated compliance in a significant number (16) of areas as set forth in this Warning letter.

Based on the foregoing, the Commission directs CCS to submit the following information regarding the school's management and administrative capacity:

- a. An attestation of the school's commitment to comply on a continuous basis with accreditation standards and requirements;
 - b. A description of the school's management structure and administrative capacity and an explanation as to how this structure is adequate to lead and manage a post-secondary educational institution in compliance with accrediting standards;
 - c. A completed organizational chart to include the names and titles of all director and management staff employees currently employed at the school;
 - d. Job descriptions and ACCSC Staff Personnel Reports for all director and management staff members included on the organizational chart;
 - e. A description of the school's plan to provide ongoing training and development for members of school management that will support their particular roles in the school and documentation of any activities that have occurred since January 1, 2018 to include items such as agendas from the training sessions, sign-in sheets, attendance rosters, and certificates of completion; 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 continuous compliance with accrediting standards.
2. CCS must demonstrate that the school's secondary educational objectives do not have greater priority within the school's mission and operations than its career-oriented educational objectives (ACCSC-approved programs/locations) (*Section I (C)(1-2), Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team found that based on the enrollment numbers provided during the on-site evaluation, enrollment at the school's unapproved Twentynine Palms location exceeded the enrollment for the Anaheim main campus and proposed Oceanside satellite location. In response to the finding, the school indicated its belief that "the most important measurement of attainment of educational objectives are not the enrollment numbers at each location, but rather the student satisfaction levels along with graduation and placement rates," citing the student survey results from the March 21-22, 2018 on-site evaluation of the main campus. The school also provided, as directed in the TSR, enrollment information for all locations during the period March 1, 2018 through August 31, 2018 as follows: Anaheim – 10; Oceanside – 37; Twentynine Palms – 40.

The Commission reviewed the school's response and found that enrollment at the Oceanside and Twentynine Palms locations – sites not approved by ACCSC – far exceeded enrollment at the Anaheim campus which is approved by ACCSC (i.e., 77 students vs. 10 students). Therefore, the Commission found that the school did not demonstrate that the secondary objective of providing training at unapproved satellite locations for a specific population of contracted students does not have greater priority than CCS's career-oriented objectives offered at the ACCSC-accredited Anaheim main campus. Accordingly, given that the overwhelming majority of the students enrolled at CCS are

engaged in training that currently falls outside of the school’s current scope of recognition by ACCSC, the Commission found the school’s primary mission and scope of operation, as currently constituted, is not to provide career-oriented educational programs.

Accrediting standards state that a school may provide programs with other educational objectives such as GED preparation, refresher training, avocational courses, and continuing education; however, any such educational objectives may not have greater priority within the school’s mission and operations than its career-oriented educational objective (*Section I (B) (1)(d)(ii), Rules of Process and Procedures, Standards of Accreditation*). It is not the Commission’s position that the school’s secondary objective of offering training programs outside of ACCSC’s scope is inappropriate or substandard, just that it may render the Anaheim main school ineligible for ACCSC accreditation.

Accordingly, the Commission determined that additional information is required in order for the school to demonstrate that CCS meets all of ACCSC’s eligibility requirements, specifically the requirement that the school’s secondary educational objectives do not have greater priority within the school’s mission and operations than its career-oriented educational objectives.

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

- a. A signed attestation as to the date the school ceased enrollment in the Oceanside, California and Twentynine Palms, California locations;
- b. A roster of all students in all programs at all locations as follows:

Program	Program Length in Months	Credential Awarded	Location (e.g., Anaheim, Oceanside, Twentynine Palms)	Program Enrollment

- c. A detailed description of the school’s plans going forward should CCS failed to obtain approval to operate the Oceanside and Twentynine Palms locations.¹; and
 - d. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s eligibility requirements.
3. CCS must demonstrate that the operation of the Oceanside location for which the school submitted an Application for a Satellite Location is in compliance with state regulations for a satellite facility (*Section I (D)(4)(b), Rules of Process and Procedure, Standards of Accreditation*). The on-site evaluation team had found that CCS is approved to operate by means of accreditation by the California Bureau for Private Postsecondary Education (“BPPE”), but that the recognition of the satellite location in Oceanside by the BPPE is not to be considered until such time that ACCSC approves the proposed satellite location. In response to the finding, the school stated the following:

The BPPE requirements for a satellite location are similar to the Commission requirements as follows: An institution offering instruction at a satellite location as define by section 94862 of the Code shall only offer instruction for educational programs that are approved for the main campus or a branch. The institution shall not maintain any permanent student records at the satellite. Satellite location means an auxiliary classroom or teaching site within 50 miles of the

¹ CCS also must submit a completed ACCSC Institutional Teach-Out Plan Approval Form for the Oceanside and Twentynine Palms locations, available for download at www.accsc.org, and all attachments to provide assurance that, in the event that the Commission does not approve the school’s non-main locations, the school has a plan which provides for the equitable treatment of students at those sites

branch or main location. California Career School has applied for and received a waiver of the distance requirement. The school currently approved to operate by means of accreditation by the Bureau for Private Postsecondary Education (“BPPE”). As such, the recognition of the satellite location in Oceanside by BPPE will not be considered until such time that ACCSC approves the proposed satellite location.

The Commission reviewed the school’s response and noted that approval of the school’s Oceanside satellite location by the BPPE is contingent upon ACCSC approval of the Oceanside location, which had not occurred. Therefore, the school did not demonstrate that the Oceanside satellite location is in compliance with state regulations. Accordingly, the school is advised that the Commission will approve the Application for a Satellite Location for the Oceanside, California location upon demonstration that CCS has demonstrated compliance with all items set forth within this letter.

Additionally, the Commission directs CCS to submit the following:

- a. A detailed description of the school’s plans going forward should CCS failed to obtain approval to operate the Oceanside location;
 - b. A completed ACCSC Institutional Teach-Out Plan Approval Form for the Oceanside location, available for download at www.accsc.org, and all attachments to provide assurance that, in the event that the Commission does not approve the location, the school has a plan which provides for the equitable treatment of students at the site; and
 - c. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance in this regard.
4. CCS must demonstrate that the proposed satellite location in Oceanside has proper management, control, and supervision through qualified administrative staff and faculty (*Section VIII (A)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school did not provide documentation demonstrating that the lead faculty member at the facility, [REDACTED] has at least three years of related practical work experience in the field. Also, the lead faculty is the operational manager of the proposed satellite location; however, the school did not provide evidence of on-going training related to the managerial responsibilities specific to the Oceanside facility. Additionally, the school did not provide evidence that qualified administrative staff (with the exception of the Program Chair) from the Anaheim location routinely visit the proposed satellite location to provide assistance to the lead faculty/operational manager of the proposed satellite location with management, control, and supervision of the facility. In response to the finding, the school indicated that [REDACTED] “has twenty years of related practical work experience in the field as a Transportation Manager with the U.S. Navy, and has received on-going training related to the managerial responsibilities specific to the Oceanside facility.” The school also provided a “Staff Members-Oceanside Visitation Schedule” to show completed and scheduled visits to the Oceanside location by various staff members (Program Manager/Operations; Career Services/Placement; Placement; Registrar; and Director) from the Anaheim campus from August through December 2018, and a visitation log for the period August 3, 2018 to September 28, 2018. The Commission reviewed the school’s response and found that visits by Anaheim staff to the Oceanside location appeared sporadic in terms of the frequency of visits to Oceanside and the amount of time spent when visits occurred. Also, the Commission noted that the school did not consistently demonstrate a link between staff that visited the Oceanside location and the required management and oversight of the facility.

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

- a. A copy of a completed organizational chart to include the names and titles of all individuals currently employed at the Oceanside location;
 - b. Job descriptions, resumes, and ACCSC Staff Personnel Reports for staff members for all director, management, and administrative staff members included on the organizational chart;
 - c. A detailed description of the management resources, oversight structure, and administrative capacity at the Oceanside location (to include management and supervision by the main school) and an explanation as to how the resources, structure, and capacity, are adequate to support school operations, student services, educational programs, and to ensure ongoing compliance with accrediting standards;
 - d. A description of the school's plan to provide ongoing training and development for members of school management and administrative employees at the Oceanside location that will support their particular roles in the school and documentation of any activities that have occurred since January 1, 2018 to include items such as agendas from the training sessions, sign-in sheets, attendance rosters, and certificates of completion;
 - 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 regarding management and administrative capacity at the Oceanside location.
5. CCS must demonstrate that the proposed satellite location in Oceanside ensures all educational and student services are readily available to students attending the proposed satellite location (e.g., advising, testing, learning resources, financial aid, employment assistance, etc.) (*Section VIII (A)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that although the students attending classes at the proposed satellite facility have access to services provided by military base personnel or other contract entities (e.g., workforce contractors) and have access to school personnel via phone and occasional on-site visits, the school did not provide evidence that there is a regular schedule for school personnel from Anaheim to travel to the Oceanside satellite location to provide support in the areas of student services and career services. In response to the finding, the school stated the following:

The students attending the proposed satellite location in Oceanside have ongoing access to the extensive student services at the Camp Pendleton Base Education Office. These services include, but are not limited to advising, testing, learning resources, financial aid, employment assistance, academic testing, and academic remediation programs (<http://www.mccscp.com/bec>). California Career School also provides access to all key staff from the Anaheim location to include placement services, registrar services, admission services and advising services. These services are provided on a regular schedule according to a published calendar which will be included as an attachment to this document.

The school also referred to the "Staff Members-Oceanside Visitation Schedule" to show completed and scheduled visits to the Oceanside location by various staff members (Program Manager/Operations; Career Services/Placement; Placement; Registrar; and Director) from the Anaheim campus from August through December 2018, and a visitation log for the period August 3, 2018 to September 28, 2018. The Commission reviewed the school's response and again found that visits by Anaheim staff to the Oceanside location appeared sporadic in terms of the frequency of visits to Oceanside and the amount of time spent when visits occurred. Again, the Commission noted that the school did not consistently demonstrate a link between staff that visited the Oceanside location and the required management and oversight of the facility.

Based on the foregoing, in addition to the response to concern (4.) above, the Commission directs CCS to provide the following:

- a. A comprehensive list of student services readily available to students at the Oceanside satellite location;
 - b. How the school delivers those services in a ready manner and the resources available to do so;
 - c. The qualifications of the staff assigned to provide the student services; and
 - d. Any additional information that the school believes will be useful to the Commission in making a determination regarding the adequacy of the student services provided and available at the Oceanside location.
6. CCS must demonstrate compliance with learning resource system standards as follows:
- a. CCS must demonstrate that the Oceanside proposed satellite location has a learning resource system that includes materials commensurate with the level of education provided and appropriate to the courses of study in sufficient quantity and scope to meet the educational objectives of the program (*Section II (A)(7)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school does not have designated learning resources available for students at the proposed satellite facility nor do students have access to electronic educational resources.
 - b. CCS must demonstrate that qualified school personnel orient, train, and assist students enrolled at the proposed satellite facility in the use of the learning resource system (*Section II (A)(7)(d), Substantive Standards, Standards of Accreditation*). The school did not provide evidence that students enrolled at the proposed satellite location are oriented in use of the school's learning resource system.

In response to the findings identified above, the school indicated that CCS “has repaired the network capabilities of the computer used for the Learning Resource system at the proposed satellite location in Oceanside (repair invoice as attachment). This Learning Resource system will offer the same resources as at the Anaheim Campus.” The school stated that the online system has “more than 94,000 books and 14 million articles from academic journals, magazines, and newspapers” and provided a list of links for learning resources and related employers. With regard to student orientation and training, the school indicated that [REDACTED], on-site manager at the Oceanside location, “was training on and demonstrated to the students the usage of the Learning Resource system up until the system was sent in for repairs in 2018.” The school stated [REDACTED] has since been trained on the upgraded Learning Resource system and that he now trains all new students in the use of the system. The Commission took note of the school's response and found that although the school upgraded the computer at the Oceanside location, the school did not provide detail on how the learning resource materials are commensurate with the level of education provided and appropriate to the specific courses of study (i.e., simply stated, the number resources available does not speak to whether any of those sources actually relate to the courses of study). Additionally, the school provided no documentation to show how students are oriented in the use of the learning resource system.

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

- a. A detailed description as to how the school's learning resource system materials are commensurate with the level of education provided and appropriate to the *courses of study* in sufficient quantity and scope to meet the educational objectives of each program and includes such elements as: relevant and current texts and periodicals; research journals and databases; standard works of

- reference; multi-media and/or electronic resources; electronic library resource technologies; and other resource materials necessary to adequately serve the student body;
- b. Documentation to show that qualified school personnel orient, train, and assist students and faculty in the use of the learning resource system; 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 learning resource systems.
7. CCS must demonstrate that the school has and applies a fair and equitable refund policy in compliance with state or third-party requirements (*Section I (D)(5), Substantive Standards, Standards of Accreditation*). In review of student files who received refunds, the on-site evaluation team found that the school utilized the date of determination for the calculation of the refund instead of the last date of attendance as required by state and federal regulations. This resulted in 9 out of 11 students having incorrect refunds. Additionally, the refund for one student was not made in a timely manner. In response to the finding, the school stated the following:

California Career School has adjusted its refund policy to calculate the hours of attendance for all refunds. Also, each affected student refund has been recalculated and any additional refunds have been applied to student accounts as required. The school is enclosing documentation to demonstrate that all refunds have been properly calculated and the student files have been updated to reflect this. Moving forward, the school director will review and approve all refunds to ensure adherence to the refund policy. Of the eight files noted above, four files were calculated correctly based on hours attended and four files were recalculated to reflect the correct refund policy.

The school also submitted Cancellation/Drop Checklists; Attendance Reports; student account statements; and copies of refund checks. The Commission acknowledged the steps taken by the school to demonstrate compliance with accrediting standards with regard to refunds; however, the school did not provide a copy of CCS's revised refund policy against which the Commission could determine whether or not the school complies with all applicable requirements.

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

- a. A copy of the school's refund policy as published in the school catalog and enrollment agreement;
- b. A copy of the school's policies and procedures for staff processing refunds;
- c. Documentation to evidence that applicable financial services staff received training on processing refunds;
- d. An ACCSC Refund Report for all refunds issued to students who were either dismissed/terminated or withdrew between April 1, 2018 and February 28, 2019 to include the enclosed the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records with 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; written notification of withdrawals (if applicable); and ledger cards for each student;
- e. 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 policy; 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 accrediting standards regarding the school's refund policy and practices.
8. CCS must demonstrate compliance with admissions standards as follows:
- a. CCS must demonstrate that prior to enrollment the school determines that an applicant meets the school's admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that in 12 out of 19 current and graduate student files reviewed, required documents, as stated in the school's catalog on pages 7 and 28, were not obtained prior to admission of the student. Missing documentation includes proof of high school graduation or equivalent credential, California Department of Motor Vehicles Print Out (H-6), DOT physical, valid driver's license, and complete vocabulary, math, and reading Test of Adult Basic Education ("TABE") scores.
 - b. CCS must demonstrate that admissions documentation for students from foreign countries is certified to be at least equivalent to the United States credential prior to enrollment (*Appendix V, Substantive Standards, Standards of Accreditation*). In review of 19 current and graduate student files, the team found two (2) files with foreign credentials that did not have supporting documentation showing equivalency to a U.S. high school diploma.
 - c. CCS must demonstrate that the school executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*). The team found that although the school director, [REDACTED], signed all enrollment agreements, there was no date acknowledging when the agreement was finalized in 18 out of 19 current and graduate files reviewed.

In response to the findings cited above, the school indicated the following:

- The California Department of Motor Vehicles ("DOT") requires that applicants pass a DOT physical but that "[t]he school does not require that prospective students obtain this DOT physical prior to enrollment and as such, documentation of DOT physical is not an admissions requirement..."
- With regard to the entrance examination, the school indicated that "[a]lthough reported missing from student files, all students do have the necessary Admissions Documentation as required on file and documentation of this is provided as an addendum."
- With respect to persons not providing evidence of high school graduation or equivalent, the school stated that "[m]oving forward, CCS will require students without proof of High School graduation or GED certification to successfully pass the Wonderlic examination for consideration of admission as an ability to benefit student..."
- In the past the school allowed students to enroll tentatively while awaiting the translation and evaluation of foreign credentials but that going forward, all applicants must provide such documentation prior to enrolling.
- That the school director signs enrollment agreements on the day admissions staff completes enrollments and that the school will ensure "that all enrollment agreements are dated appropriately by the school director."

The school also submitted entrance examination answer keys and test results for several students as well as foreign credential evaluation documentation for a student admitted since the on-site evaluation. The Commission reviewed the school’s response and noted that the school provided no copy of CCS’s admission requirements against which the Commission could determine whether or not the school complies with all applicable requirements. Additionally, the school provided no documentation to show that CCS executes enrollment agreements in accordance with school policy and accrediting standards.

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

- a. A copy of the school’s admissions policies and procedures for ensuring that prior to enrollment, the school determines that an applicant meets the school’s admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements;
- b. A list of all students enrolled between April 1, 2018 and February 28, 2019 as follows:

Student	Program	Date Enrollment Agreement Signed and Accepted by School	Date all Admissions Documentation Secured	Class Start Date

- c. A copy of the enrollment agreement and admissions documentation secured for each student included in the list in (b.) above that show that the student met the school’s admissions requirements;
 - d. An explanation for any student enrolled for whom the school did not secure the required admissions documentation or execute the enrollment agreement in accordance with the stated requirements; 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 accrediting standards regarding the school’s admissions requirements and practices.
9. CCS must demonstrate that the school maintains verifiable records of initial employment (*Section VI (C)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school did not provide the results of an independent third-party audit to verify the CCS’s most recently reported employment data in accordance with the instructions provided in the Application for Renewal of Accreditation and Self-Evaluation Report. The school provided the independent third-party verification for the 2016 Annual Report; however, the instructions given at the Renewal of Accreditation Workshop attended by the school directed CCS to provide independent third-party verification of the 2017 Annual Report. In addition, the May 9, 2018 Workshop Assignment Letter and details specifically stated “Schools assigned to the July 2017 Accreditation Renewal Workshop will use the 2017 ACCSC Annual Report for verification.” In response to the finding, the school stated that CCS mistakenly provided 2016 data and has submitted in response to the TSR an independent third party report for the 2017 Annual Report data. The Commission reviewed the school’s response and found that the school’s independent third party indicated that the audit covered the period January 1, 2017 through December 31, 2017, which is not in accordance with the Commission’s directive that the school provide an independent third party report for CCS’s 2017 Annual Report. The Commission also noted that the third party verified as correct 15 of 24 (62%) records across all programs and could not verify 9 of 24 (37%) records across all programs. Therefore, the school did not sufficiently demonstrate that CCS maintains verifiable records of initial employment in accordance with accrediting standards.

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

- a. An updated description of the school’s process and procedures for recording and verifying graduate employment along with a copy of the current verification form(s) or other tools the school is currently utilizing to verify employment;
- b. For each student who graduated between July 1, 2017 through June 30, 2018 who are employed in field, provide the following information:

Graduate Name	Program	Start Date	Place of Employment, Address, & Phone#	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title

- c. The following supplementary information:
 - i. A copy of the school’s completed verification form (as indicated in item a. above) for each graduate employed listed in (b.) above;
 - ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:
 - The graduate’s name and contact information;
 - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
 - An attestation that the graduate is earning training-related income; and
 - In cases where licensure is required for employment, an attestation that such licensure has been achieved; and
 - iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.

10. CCS must demonstrate that the school’s graduation and graduate employment rate for each program are disclosed accurately (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school discloses its graduation and employment rates to prospective students as part of the enrollment package. Documentation in the reviewed student files demonstrated prospective students sign an acknowledgement entitled “How Our Students Are Doing,” which appeared to include the combined total number of students that graduated and then obtained employment from the Anaheim, Oceanside and Twentynine Palms locations. The team could not determine the accuracy of the information presented in the material because it did not align with any of ACCSC’s records regarding enrollment, graduation rates, and employment rates at the Anaheim campus. In response to the finding, the school indicated that the form used is given to students to meet the requirements of the California Bureau for Private Postsecondary Education (“BPPE”) and that “[n]umbers reported will align with the BBPE report submitted annually.” The school noted that the BPPE uses a calendar year for reporting and provided an updated form with data for the year 2016. The Commission reviewed the school’s response and found that the school did not meet accrediting standards with regard to disclosure of student achievement outcomes. While the school should provide student achievement data to students as required by CCS’s state licensing agency, the school also must

provide data to students in accordance with accrediting requirements, which includes reporting by program that is reflective of the school's most recent ACCSC Annual Report submission.

Accordingly, the Commission directs CCS to submit documentation to show that the school discloses, minimally, the graduation and graduate employment rate for each program offered as reported in the school's ACCSC 2018 Annual Report. The disclosure for each program's graduation and graduate employment rate must be accurate and include the program population base and timeframe upon which each rate is based.

11. CCS must demonstrate compliance regarding graduate employment backup documentation and verification as follows:
 - a. CCS must demonstrate that the school maintains documentation to support the classification of graduates as "Unavailable for Graduation"/"Graduates-Unavailable for Employment" (*Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation*). Upon review of the backup documentation for the submitted Graduation and Employment Charts, the on-site evaluation team found that students classified as "Unavailable for Employment" did not meet the requirements to be classified in this category.
 - b. CCS must demonstrate that the school's employment classification is for a reasonable period of time and can be considered sustainable (*Section VII (B)(1)(b), Substantive Standards, Appendix VII, Standards of Accreditation*). A majority of employment verification records reviewed by the on-site evaluation team did not include a hire or start date; therefore, it was unclear if the employment was held for a reasonable period of time and could be considered sustainable.

In response to the finding, the school asserted, regarding students categorized as having medical conditions, that "[a]s drug use and addiction is considered a condition by the medical community, CCS understands drug abuse as a medical condition; as such, it prohibits students from being available to graduate from the CCS training program and/or makes them unavailable for employment as employers are also expected to comply with the same FMCSA and DOT mandates that prohibit commercial driving for those who have are victim to substance abuse. The only way a student can correct a drug use violation is to go through a medical rehabilitation program." The school acknowledged that one student reported as unavailable for employment should have been listed as furthering their education. The school also indicated that a student listed as unavailable for employment was in the process of resolving personal legal issues and therefore CCS deemed the classification appropriate. Additionally, the school stated that "CCS considers the failure of a DOT (state department of transportation) physical as a reason a student is unavailable for graduation as related medical conditions prohibit them from training and licensing by the Department..." With regard to sustainability of employment, the school indicated that CCS has updated the school's paper records to reflect start dates and employment end dates (if applicable).

The Commission reviewed the school's response and found that while the school described changes made to CCS's employment verification form, the school provided no documentation to show implementation of the changes. With regard to student classifications, the Commission advises the school that the reasons posited in its response are not valid. Students may be classified as Unavailable for Graduation on the following grounds only: death, incarceration, active military service deployment, and the onset of a medical condition that prevents continued enrollment. Additionally, graduates may be classified as Unavailable for Employment only on the following grounds: death, incarceration, active military service deployment, the onset of a medical condition that prevents continued enrollment, or international students who have returned to their country of origin.

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

- a. The Graduation and Employment Charts submitted in the school’s 2018 Annual Report for all programs;
- b. Supporting summary information for each Graduation and Employment Chart as follows:
 - i. For each student start, provide the following information:

Student ID# ²	Program	Start Date	Graduation Date	Withdrawal/Termination Date

- ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following information:

Student ID#	Program	Start Date	Reason Unavailable	Description of the Documentation on File

- iii. For each graduate classified as employed in the field³ (line #14), provide the following information:

Graduate ID#	Program	Start Date	Graduation Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ⁴ (i.e., graduate or employer)

- iv. Supporting and verifiable documentation or a narrative justification for each graduate in (iii.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study;
 - v. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Graduate ID#	Program	Start Date	Description of the Documentation on File

- vi. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following information:

Graduate ID#	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File

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 student achievement reporting requirements.

12. CCS must demonstrate that the programs offered in credit hours are comprised of a majority of courses that require out-of-class work/preparation (*Section II (A)(3)(f) and Appendix III, Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school reported all programs in credit hours; however, the school did not provide documentation of out-of-class work/preparation for any of the programs. In addition, the school did not demonstrate that CCS calculates the credit hours in compliance with the calculations as required by the *ACCSC Standards of Accreditation*. In response

² If the school uses the student’s Social Security Number as the Student ID, submit the student’s name instead of the ID#. Do not submit Social Security Numbers, partial or otherwise, in the school’s Report.

³ See *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*.

⁴ *Appendix VII (4)(a) Guidelines for Employment Classification* requires the school to verify the employment classification.

to the finding, the school stated that “California Career School has always reported their programs in clock hours with a credit hour conversion based on the formula that was approved by the Commission and/or the DOE at the time. Since the school’s programs are less than an academic year, California Career School is submitting the “Allocation of Hours for Clock Hour Programs” calculation sheets. The school has always calculated financial aid based on clock hours and will only use clock hours in referring to all the reported programs.” The school also provided ACCSC Allocation of Hours for Clock-Hour Programs for each of the school’s programs. The Commission reviewed the school’s response and advises CCS that since the school awards both clock and credit hours for its programs, CCS is required demonstrate out-of-class work/preparation in the calculation of program semester credit hours. Accordingly, the Commission directs CCS to submit a completed Outline of a Non-Degree Program form for each of the school’s programs that are measured in semester credit hours.

13. CCS must demonstrate that student externships are supervised by a designated school employee who has the appropriate practical work experience qualifications (*Section II (A)(8)(c)(i), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that student externships are coordinated through [REDACTED], who has a bachelor’s degree in Organizational Leadership and over six years of experience as an administrative assistant, sales associate and location manager; however, [REDACTED] does not have any related practical work experience in the occupational field associated with the training provided. In response to the finding, the school stated that:

“California Career School utilizes the Program Manager to monitor and supervise the student externships in the Professional Commercial Truck Program. [REDACTED] oversees the administrative documentation that is reported to the Registrar. A signature line has been added to our tracking document for the Program Manager to indicate that he alone supervises the externship portion of this program.”

The school also submitted a copy of the school’s Externship Evaluation form that has fields for the Externship Coordinator’s name and signature. The Commission reviewed the school’s response and determined that the school did not provide information to show appropriate supervision of CCS’s externship program. The Commission noted that the school did not indicate in its response who specifically supervises the externships and that individual’s qualifications to do so.

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

- a. The name and title of the school employee designated with supervising CCS’s externship program, including a completed ACCSC Faculty/Staff Personnel Report and a resume;
 - b. A detailed description of the duties and responsibilities of the person that supervises the externship program; 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 accreditation standards regarding faculty qualifications.
14. CCS must demonstrate that faculty engage in ongoing professional development activities (*Section III (A)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that out of eight (8) faculty files reviewed, five (5) faculty members did not show documentation of completed ongoing professional development. Although the school provided documentation listing training course name and dates, it was unclear if the courses were actually attended and completed. In response to the finding, the school submitted instructor resumes; Employee Training summary sheets for instructors listing courses taken, dates, and locations; two ACCSC Faculty Personnel Reports; one list of

completed field-related development; and one Instructor Credential certificate. The Commission reviewed the school's response and found that while the school provided lists of faculty professional development activities, the school provided very little documentation of activities completed. Therefore, the Commission determined that additional information is necessary in order to provide the school an additional opportunity to demonstrate compliance with accrediting standards with regard to faculty professional development.

Based on the foregoing and as a means for the school to show its ongoing efforts to ensure that all faculty and educational administrators engage in ongoing faculty assessment and professional development activities, the Commission directs CCS to submit the following:

- a. A list of all faculty members and the courses taught by each;
 - b. Copies of individual faculty development plans for each faculty member;
 - c. Certificates of completion or other evidence of completion for all completed faculty development and trainings; and
 - d. Any other information the school deems necessary to report on its continued efforts to demonstrate its faculty and educational administrators engage in ongoing faculty assessment and professional development activities.
15. CCS must demonstrate that the school verifies prior work experience of the faculty (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). Upon review of eight (8) faculty files, the on-site evaluation team found no documentation of verification of work experience. In response to the finding, the school indicated that CCS keeps a complete history of personnel activities for the school's employees. The school noted that some former employers of current CCS staff do not respond to requests for employment verification. The school provided in its response documentation of employment verification for four of seven faculty members. The Commission reviewed the school's response and determined that additional information is necessary in order to provide the school another opportunity to demonstrate CCS's ongoing efforts at verifying prior work experience of its faculty.

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

- a. A copy of the school's written policies and procedures for verifying prior work experience of CCS faculty;
 - b. A current list of all faculty members and documentation of the school's efforts to verify prior work experience; 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 accreditation standards in this regard.
16. CCS must provide an explanation regarding the school's plan for the Twentynine Palms location and why the school did not submit an Application for a Satellite Location for this facility. In response to the on-site evaluation report, the school indicated its intent to submit a satellite application and stated that it was advised by ACCSC staff to complete the Oceanside satellite application process first. The Commission noted the school's response and again advises the school that CCS must cease enrollments at the Twentynine Palms location until such time as the school receives Commission approval to operate the Oceanside and Twentynine Palms locations as satellite campuses of the Anaheim main school.

WARNING RESTRICTIONS:

Pursuant to *Section VII (K)(9), 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)(8) Rules of Process and Procedure, Standards of Accreditation*).

RESPONSE REQUIREMENTS:

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

CCS 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.⁵ **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.**

CCS 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.

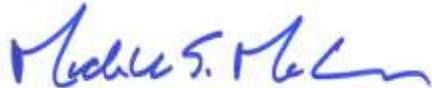
The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before March 14, 2019**. If a response, the required \$500.00 processing fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before March 14, 2019**, the Commission will consider further appropriate action.

⁵ 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.

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,

A handwritten signature in blue ink, appearing to read "Michale S. McComis".

Michale S. McComis, Ed.D.
Executive Director