

November 18, 2019

ELECTRONIC DELIVERY

██████████
Director
Construction Training Center
7355 Garners Ferry Road
Columbia, South Carolina 29209

School #M072307
Continued Warning Letter

Dear ██████████

At the August 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to place Construction Training Center (“CTC”) located in Columbia, South Carolina on Warning in relation to the school’s Application for Renewal of Accreditation. Upon review of the March 27, 2019 Warning letter and the school’s response, the Commission voted to continue CTC on **Warning** with a subsequent review scheduled for ACCSC’s **May 2020** meeting. The reasons for the Commission’s decision and the Commission’s requirements for CTC to demonstrate compliance are set forth below.

Application for Renewal of Accreditation

1. CTC must demonstrate that the school has adequate management and administrative capacity in place that includes owners, board members, members of school management, and administrative employees who are qualified for their particular roles and who possess the appropriate education, training, and experience commensurate with the level of their responsibilities (*Section I (A)(1)(a), Substantive Standards of Accreditation*). Based on the quantity and nature of Team Findings identified by the on-site evaluation team; the number of issues in the March 27, 2019 Warning letter; and the number of issues that remain as set forth in this Continued Warning letter the Commission continues to question whether CTC’s leadership has the administrative capacity sufficient to ensure operation of the school in compliance with accrediting standards.

In response to the March 27, 2019 Warning letter, CTC provided documentation that ██████████ attended the Accreditation Workshop in June 2019; an organization chart; job descriptions; and information pertaining to the Board of Directors. In reviewing the information provided as part of the response, the Commission noted that the 2019-2020 catalog lists ██████████ as a vice-president but that the school provided no information for ██████████ and he is not listed on the organizational chart. In addition, the organization chart and job descriptions do not list any individuals responsible for recruiting or admissions.

In relation to the Board of Directors, the Commission directed CTC to provide information pertaining to the role of the Board members along with meeting minutes and agendas for any meetings held since the submission of the response to the November 21, 2018 Team Summary Report (“TSR”). In reviewing the response, the Commission noted that the policy and procedures manual lists “[t]he board is to approve the institutional purpose, objectives, philosophy, and biblical foundations and to also review these regularly to ensure that they are being pursued faithfully.” However, it was unclear from the Board of Directors April 30, 2019 and June 6, 2019 meeting notes that this is the function of the board. In particular, the meeting notes under the “Purpose of Board” section indicates:

- *Use board members for feed back [sic] on CTC policies and procedures*

- Board may donate time and effort to CTC whether it be for information sharing, job searches, course training in leadership, how to get a job, grooming and dressing, and etc. anyone can support the school and students in this manner.
- Board will have list of current courses and text books [sic] to provide feedback.
- Board need to review and respond with some form of data, whether it be a survey or summary of ideas or findings.
- We will reach out to the board every two weeks for feed back [sic] and with any updates we may have.

From this description, the interaction of the board remains unclear, in particular, how the duties of the Program Advisory Committee are separate from the Board of Directors or the outcome if the Program Advisory Committee and Board of Directors disagreed.

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

- a. An explanation of [REDACTED] role at the school and why he is listed in the catalog but not on the organization chart provided, along with a job description and information and documentation pertaining to his position, as applicable;
 - b. A listing of the personnel responsible for recruitment and admissions along with job descriptions and information and documentation pertaining to their position;
 - c. An updated organization chart listing all management and administrative staff by name and title including those individuals responsible for admissions and recruiting;
 - d. Completed job descriptions for each position listed on the organization chart including information pertaining to those individuals responsible for admissions and recruiting;
 - e. A listing of the Board of Directors, their titles, current affiliations, and an explanation for each as to their qualification to serve on the board;
 - f. An updated description of the role of the Board of Directors along with any changes made to the policies and procedure manual in response to the findings set forth herein;
 - g. Meeting minutes and agendas for any Board of Directors meeting held since the submission of the response to the March 27, 2019 Warning letter;
 - h. Meeting dates for any upcoming Board of Directors meeting in 2020; 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 accrediting standards in this regard.
2. CTC must demonstrate that members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school (*Section I (A)(3), Substantive Standards, Standards of Accreditation*). The TSR states that professional development activity in 2017 appeared to be isolated or episodic activity rather than ongoing activities as the school was unable to demonstrate any documented professional development or continuing education activities for managers or administrative staff in 2014, 2015, 2016, or 2018. In response to the TSR, CTC stated that the school now requires each "staff member to refer to the professional development section of the ACCSC website" and "complete at least one webinar on the ACCSC site per month" with a certificate of completion to be placed in their personnel file. In addition, "[REDACTED] will seek professional development

opportunities beyond the ACCSC website for themselves and other faculty/staff members.” However, the school did not provide any documentation demonstrating staff members have completed any ACCSC webinar trainings or other professional development opportunities.

As such, the March 27, 2019 Warning letter directed CTC to submit professional development plans along with supporting documentation for all school staff. In response to the March 27, 2019 Warning letter, the school implemented mandatory “Lunch and Learn (L&L) Webinar Sessions” to be held “on the 1st or 3rd Friday of the month,” and signed agreements that state:

I, (insert name) have received and read the ACCSC Standards of Accreditation in its entirety, as to what standards and expectations are required within my job description. I understand and agree with the content printed and will adhere to the policies that has been set forth for me to abide by from Construction Training Center through ACCSC. Furthermore, I agree to participate in any webinar associated with ACCSC as a professional development and or, continuing education activity once per month on the ACCSC website, with a certificate to be placed in my personnel file.

In reviewing the documentation from the lunch and learn sessions, the Commission noted that although everyone attends each training, the trainings do not necessarily support each individual’s particular roles in the school. Specifically, all staff had attended the following trainings:

- The Many Hats of an Educator: Caring Beyond the Curriculum to Promote Student Success;
- Be Realistic, Be Ready: Success Strategies for Schools in the ACCSC Accreditation Process; and
- Best Practices Webinar: Independent Third-Party Verification of Placement.

While the Commission recognized the school’s efforts, the Commission is concerned that only utilizing the ACCSC webinars as an ongoing professional development plan will not provide support for each staff member for their particular roles in the school. Although ACCSC believes in the value of its available content, that content is largely limited to the accreditation aspects of school operations and does not address other crucial topics such as leadership, team building, innovative approaches in student support services and career services, financial aid requirements or opportunities, developing dual enrollment programs, building partnerships amongst your community, and many other relevant, timely, and important topics that will help to enhance CTC.

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

- a. The school’s updated professional development plan and expectations for each management and administrative employee;
 - b. Evidence that each management and administrative employee engage in ongoing development and training activities that support their particular roles in the school;
 - c. Supporting documentation of completed professional development activities; and
 - d. 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 in this regard.
3. CTC must demonstrate that the school has appropriate administrative and operational policies and procedures to which the school adheres and reviews and updates as needed (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that CTC did not have written policies and procedures beyond the brief policy statements provided in the school

catalog and that in many operational areas staff indicated that school practice differs from the expectations set forth in the catalog. In response, the school stated:

CTC is formulating a new policies and procedures manual that will reflect actual daily operations and practices occurring and to keep the various areas of the school in compliance. This new manual will be an expansion of documentation found in the student catalog to offer step by step procedures for the administrative staff. The Policies and Procedures Manual will be updated regularly as needed.

However, CTC did not provide a copy of the Policies and Procedures Manual. As such, the March 27, 2019 Warning letter directed the school to provide a copy of the Policies and Procedures Manual. In response to the March 27, 2019 Warning letter, the school provided a copy of the “Policy and Procedures Manual – Construction Training Center Edition: 2019-2020.” In reviewing the manual, the Commission noted that the manual refers to the school as a “University” and references an Ability to Benefit policy when it does not appear the school enrolls ability-to-benefit students. Additionally, CTC did not provide any information on the school’s plans to review and update the policies and procedures as needed. As such, the Commission directs CTC to submit an updated policies and procedure manual that correctly identifies the school and the school’s policies along with the school’s plan to review and update the policies and procedures manual as needed.

4. CTC must demonstrate that the school has and applies a fair and equitable refund policy in compliance with state or third-party requirements, or in the absence of such requirements, in accordance with generally accepted practices (*Section I (D)(5), Substantive Standards, Standards of Accreditation*). The TSR states that CTC received a letter from [REDACTED] U.S. Department of Education School Participation Division, Atlanta Compliance Manager, informing CTC that the school was not using the correct documents and calculation process for student refunds. In summary, the school appears to have been calculating refunds based on the proportion of total program completed, rather than the proportion of the current payment period. CTC has not yet issued supplementary refund payments as needed to correct the erroneously calculated refunds. Additionally, school staff provided inconsistent statements of the timeframe in which refunds must be paid, and the school does not appear to possess documentation of the dates on which refunds are paid, stating that a third-party servicer, [REDACTED] [REDACTED] processes the school’s post-withdrawal disbursements.

In response to the TSR, CTC acknowledged the error in the calculations noting that “[w]ith the wrong calculation, all withdrawal students Total IV [*sic*] aid to be returned was \$0,” that the school continues to work with [REDACTED], Department of Education School Participation Atlanta Compliance Manager, and that “[o]nce all R2T4 has been reviewed by [REDACTED] CTC will be put on a payment plan to repay all refunds.” In addition, the school provided an updated policy as listed in the Student Catalog that states “[a]ny money to be refunded to the students will be paid within forty (40) days of denied acceptance, the last documented date of attendance, or formal termination by the school” along with a blank copy of the R2T4 Format Sheet. However, it is unclear if a student has both a last documented date of attendance and formal termination date and if these dates are different, which date will be utilized by the school. Additionally, CTC stated that “[t]he Financial Aid department will tape the refund policy on their wall, to ensure they are complying.” However, the school did not submit any documentation to demonstrate training on the updated refund policy.

As part of the response to the March 27, 2019 Warning letter, CTC indicated that the school established a new R2T4 policy; hired [REDACTED] for the newly created director position “to oversee daily operations of the financial aid department;” provided an update on the communications with the DOE; and submitted information on refunds issued to students between January 1, 2019 and May 31,

2019. In reviewing the information provided, the Commission noted the updated “Refund Table for \$13,000.00 900 Hour Course” lists the following:

Hours Attended	% Refund	Amount Institution Retains	Refund Amount
1 – 40	90%	\$1,300.00	\$11,700.00
41 – 80	80%	\$2,600.00	\$10,400.00
81-120	70%	\$3,900.00	\$9,100.00
121 – 160	60%	\$5,200.00	\$7,800.00
161 – 200	50%	\$6,500.00	\$6,500.00
201 – 240	40%	\$7,800.00	\$5,200.00
241 – 640	0	\$13,000.00	\$0

The Commission found that the 900-hour course chart only provides up to 640 hours in the “Hours Attended” column while listing the full program cost that may lead to confusion by students. In addition, the refund calculations are based on a 450-hour payment period but that is not clearly indicated in the above chart.

Additionally, CTC provided a letter it sent to the U.S. Department of Education (“the Department”) indicating the school is unable to pay the amount due in full. The school did not provide documentation that the amount due has been paid. In addition, the training documentation appears to be internal self-training for Delores Smith-Pressley as the form signed on April 18, 2019 states:

I have received and read a copy of the 2018-2019 Construction Training Center Financial Aid Policy & Procedure Manual created based on Federal Department of Education and ACCSC requirements.

I also certify I have received training on any updates by the Department of Education concerning financial aid for 2018-2019.

The Commission found that of the two (2) students due a refund between January 1, 2019 and May 31, 2019, both were late and occurred after the hiring of [REDACTED] with one (1) occurring due date of May 7, 2019, after the signing of the training documentation. The response states that the return to Title IV was refunded late due to the refunds being “processed through a 3rd party servicer” who made CTC aware the school was “responsible for completing the R2T4 calculations.”

The Commission remains concerned that CTC has yet to process a refund correctly. As such, the Commission remains interested in obtaining information on the ongoing process to provide refunds to previous students and the implementation of the new policy and procedures.

Based on the foregoing, the Commission directs CTC to provide the following:

- a. An update on the payment plan to repay all previous refunds along with documentation of any communication with the Department of Education;
- b. Clarification on the Refund Table for the 900 Hour program and whether the table includes multiple payment periods;
- c. A copy of the school’s refund policies and procedures as included in the Policies and Procedures Manual;
- d. The school’s refund policy as listed in the catalog;

- e. A copy of the school’s refund policy as listed on the enrollment agreement;
 - f. A copy of the training documents associated with the “2018-2019 Financial Aid Training” certifications;
 - g. A list of all personnel who process refunds along with documentation of financial aid training completed since the submission of the response to the March 27, 2019 Warning letter, if applicable;
 - h. An ACCSC Refund Report for all refunds issued to students who were either dismissed or withdrew between June 1, 2019 and February 29, 2020 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;
 - i. 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
 - j. 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.
5. CTC must demonstrate that the school terminates students who do not return following a leave of absence and applies the school’s refund policy in accordance with applicable and published requirements (*Section VII (A)(3)(c)(iii), Substantive Standards, Standards of Accreditation*). The TSR notes that a student’s leave of absence may not exceed 30 days; however, school staff indicated that CTC did not apply any clear policy to terminate students who fail to return from a leave of absence after 30 days. In response to the TSR, CTC “created a new form for students [to] request a leave of absence before taking leave” and included on the form the “penalty of termination if he/she does not return in 30 school days.” In addition, the school submitted a Leave of Absence Form and letter from [REDACTED] for a student taking a leave of absence. In reviewing the documentation provided, the Commission found that the student signed the Leave of Absence Form on September 18, 2018 with a Scheduled Return Date of October 30, 2018 does not appear to conform to the school’s policy that a leave of absence may not exceed 30 days.

The March 27, 2019 Warning letter directed CTC to submit the school’s policies and procedures; a list of personnel who conduct leaves of absence along with documentation of their training on the updated policy; and information on students who took a leave of absence between April 1, 2019 and May 31, 2019. As part of the response to the March 27, 2019 Warning letter, the Commission found the school’s updated policy states:

A leave of absence is requested by students who wish to withdraw from the current quarter, or who do not wish to attend a future quarter (Excluding summer as the starting term). Staff must utilize the new student leave of absence (LOA) form before a student takes leave. The form indicates the penalty of termination if he/she does not return in 30 school days. The student must sign the form along with the Director of Student Operations and Financial Aid Director and placed on file. All request of LOA form must come from the Financial Aid Office.

The Commission is concerned that based on the updated policy, a student may believe anytime they want to withdraw that they will be placed on a leave of absence instead. Additionally, the Commission noted the following issues with the two (2) students placed on a leave of absence between April 1, 2019 and May 31, 2019:

- The leave of absence form for [REDACTED] indicates he began his leave on April 23, 2019 with a scheduled return date of June 3, 2019 which does not conform to the school’s policy that a leave of absence may not exceed 30 days;
- The leave of absence form for [REDACTED] indicates he began his leave on April 10, 2019 with a scheduled return date of May 13, 2019 which does not conform to the school’s policy that a leave of absence may not exceed 30 days; and
- Information on the leave of absence form for [REDACTED] was adjusted without indication that [REDACTED] was aware of the changes. Specifically, the Scheduled Return Date was changed from May 13, 2019 to May 22, 2019 and the Hours Used were changed from 153.1 to 213.72 with only the initials “CK” next to the change.

The Commission is particularly concerned over the change in hours made on [REDACTED] form as the extended date further exceeds the school’s 30 day policy and the increase in hours used would directly impact the student’s refund calculation. The Commission also questions how the scheduled return date could be extended and the number of hours used increased at the same time.

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

- A copy of the school’s leave of absence policy as found in the school catalog;
 - A copy of the school’s updated leave of absence policies and procedures;
 - An explanation for the changes made to [REDACTED] leave of absence form;
 - A list of students who requested and took a leave of absence between June 1, 2019 and February 29, 2020;
 - Appropriate documentation of the leave of absence for any student listed in (d.) above; and
 - 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 leave of absence policy or practices.
6. CTC must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, and Appendix VI, Standards of Accreditation*). In response to the March 27, 2019 Warning letter using a January 2019 Report Date on the Graduation and Employment (“G&E”), Charts, the school reported the following student achievement rates:

Program (Credential)	Length in Months	CTC Graduation Rate	ACCSC Benchmark Graduation Rate	CTC Employment Rate	ACCSC Benchmark Employment Rate
Form Carpentry (Diploma)	4	67%	73%	33%	70%
Rod Buster (Diploma)	4	60%	73%	63%	
Form Carpentry (Diploma)	6	20%	73%	100%	
Rod Buster (Diploma)	6	40%	73%	100%	

The Commission found that CTC reported graduation rates and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.¹ Additionally, while the Commission is aware

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

of the small cohorts sizes for the programs, the Commission is concerned with the significantly low graduation rates for the current 6-month versions of the programs.

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

- a. A copy of the school’s student achievement improvement plan for the Form Carpentry (Diploma) and Rod Buster (Diploma) programs specifically addressing any modifications or improvements implemented in the following areas:
 - i. Admissions requirements and process;
 - ii. Curriculum modifications;
 - iii. Student Services;
 - iv. Career services and employer engagement; and
 - v. Evaluation of current retention trends and employment trends including an assessment as to when the programs’ student achievement rates are expected to meet ACCSC’s benchmark rates.

- b. A Graduation and Employment Chart for the Form Carpentry program and Rod Buster programs using **January 2020** as the Report Date;

- c. Summary information for **each** Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:

- i. For each student start, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1					

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

Count	Student ID	Program	Start Date	Reason Unavailable	Description of the Documentation on File
1					

- iii. For each graduate classified as employed in the field² (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ³ (i.e., graduate or employer)
1								

- iv. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

- v. From the list in (iii.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

² See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

³ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

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

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File
1						

and

d. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.

7. CTC must demonstrate that all submissions and notifications to the Commission are prepared in accordance with any specific instructions issued by the Commission (*Section I (H)(1) Rules of Process and Procedure, Standards of Accreditation*). The TSR notes that CTC did not engage an independent third-party for verification of graduate employment records or comply with any of the applicable instructions set forth in *Section VII (C)* of the Self Evaluation Report. In response to the TSR, CTC stated “[a]fter getting a better understanding of the requirement, [REDACTED] made the initial contact with CARS” and that “[t]he school is awaiting a demonstration and prices list” but that “the school will purchase the service and begin using it for third party verification.” In addition, the school stated that “CTC will use the CARS third part verification for all students reporting employment after graduation.” As such in the March 27, 2019 Warning letter, the Commission directed the school to provide a copy of the independent third-party review of the ACCSC 2018 Annual Report data.

In response to the March 27, 2019 Warning letter, CTC stated:

After obtaining the third party verification contract, due to time constraint they will not be able to conduct verification until July 1st. Once completed, it will be sent. In addition, due to the midst of being in the 2018 audit the third party prefers to wait until the completion of audit.

Based on the foregoing, the Commission directs CTC to submit an independent third-party review of the ACCSC 2018 Annual Report data following the [ACCSC Guidelines for Independent Third-Party Employment Verification](#) including the following chart completed for each program:

Independent Third Party Initial Employment Verification			
Reported Program Rates			
Annual Report Year	Program Title (Credential)		Length of Program (Months)
Total Number of Students Sampled	Total Number of Available Students to Sample*	Sample Size Percentage	
Verified as Correct	Verified but Different	Unable to Verify	Verified as Not Correct

* Students classified as Graduates - Employed in Field in program

Placements Verified by a Different Independent Third-Party*	
Company Name	Number of Graduates Verified

* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”

In addition, the response should include the following chart with aggregate institutional results across all programs:

Independent Third Party Initial Employment Verification Reported Institutional Rates			
Annual Report Year		Name of Company	
Total Number of Students Sampled	Total Number of Available Students to Sample*	Sample Size Percentage	
Verified as Correct	Verified but Different	Unable to Verify	Verified as Not Correct

*Students classified as Graduates - Employed in Field across all programs for Annual Report year

Placements Verified by a Different Independent Third-Party*	
Company Name	Number of Graduates Verified

* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”

8. CTC must demonstrate that the school supports student achievement rates through verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, and Appendix VII, Standards of Accreditation*). The on-site evaluation team had the following concerns related to initial employment policy and documentation:
 - The school did not possess adequate documentation of graduates’ initial employment in accordance with requirements set forth in *Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*;
 - The school maintained an internal tracking database of verbal discussions with graduates or employers, and video testimonials provided by graduates, however, the records maintained in many cases failed to clearly provide information such as the graduate’s job title, duties, and start date;
 - CTC was unable to explain how the school determined a graduate’s placement to be appropriately related to the field of training;
 - The school often appeared to obtain verbal confirmation of employment from either the graduate or employer, but not from both parties as required; and
 - CTC was unable to demonstrate that the school makes a diligent effort to obtain written verification of employment prior to accepting verbal confirmation.

In response to the on-site evaluation team’s concerns, CTC stated:

If CTC administrative staff had a better understanding or even an awareness of the detailed information required, then better efforts would have been made. Since reading the Standards of Accreditation, all required information is being collected for proper reporting, beginning with the next students to graduate from CTC, gaining employment. Written verification is now required from the employer. CTC will continue to perfect the process of written verification and utilizing third party verification.

While the Commission recognized the schools efforts to correct the previously identified discrepancies with regard to initial employment verification, the Commission did not consider CTC’s lack of understanding as a sufficient mitigating factor and as such directed CTC to provide information on the ongoing process and the implementation of the new policy and procedures.

In response to the March 27, 2019 Warning letter, the school provided a chart of the graduates who gained employment between March 1, 2019 and May 31, 2019 but only provided a single completed verification form for [REDACTED]. It is unclear from the information provided whether the written documentation was completed by the graduate or employer as required by the Standards of Accreditation or if the school obtained verbal confirmation and completed the verification form. Overall, the Commission found that once again the school has not submitted sufficient information to demonstrate compliance with accrediting standards.

Based on the foregoing, the Commission directs CTC to provide the following:

- a. A copy of the current verification form or other tools the school is currently utilizing to verify employment;
- b. For each graduate who gained employment between June 1, 2019 thru February 29, 2020 provide the following information;

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

- c. The school must provide the following supplementary information:
 - i. 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;
 - 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; and
- d. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s standards.
9. CTC must demonstrate that faculty and educational administrators engage in ongoing faculty assessment and professional development activities that: are appropriate to the size and scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement. These professional development activities should include elements such as continuing education in the subject area(s) taught; teaching skill development; instructional methodology development; membership in trade and professional organizations as appropriate; and other elements appropriate for the ongoing professional development of faculty. The school is required to document the implementation of these professional development activities for its faculty (*Section III (A)(2), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team found that CTC’s faculty personnel files included evidence of professional development activities in 2013, but that the school was unable to demonstrate that faculty members engaged in any ongoing training or development activities during the current cycle of accreditation. In response, the school stated that faculty members are required to “refer to the professional development section of the ACCSC website” and “complete at least one webinar on the ACCSC site per month and print out the certificate of completion for their personnel file.” However, the response does not include any documentation to demonstrate implementation of the updated policy. Additionally, it is unclear how these professional development activities include specific elements for faculty as listed in the *Standards of Accreditation*.

The March 27, 2019 Warning letter directed the school to submit an explanation for how the policy ensures faculty and educational administrators complete professional development activities that are appropriate to the size and the scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement. In response, CTC stated that “all faculty are required to participate in the mandatory [Lunch and Learn] trainings.” Similar to the concern related to staff and the appropriateness of the lunch and learns with relation to supporting each individuals particular role in the school, it is not clear each lunch and learn activity is intended to support the quality of education provided; and enhance student learning and achievement.

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

- a. An explanation for how the policy ensures faculty and educational administrators complete professional development activities that are appropriate to the size and scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement;
- b. A list of current faculty members and educational administrators and a 2020 plan for each individual along with evidence for any activities completed;
- c. Any additional information that the school believes will be useful to the Commission in making a determination.

10. CTC must demonstrate that the school's student services program includes relevant coping skills (e.g., life, career development, budget, and personal financial planning skills) (*Section VI (A)(3)(b) Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CTC stated that the school does not have a program to assist students with budgeting, financial planning, or other life skills beyond academic and career assistance. In response to the TSR, the school stated that:

CTC maximized the sections in the NCCER curriculum that applied to life skill and career development. The two modules offered are Basic Communication Skills and Basic Employability Skills. While the two modules covered job applications, resumes, interviewing skills and problem solving skills, they fail to meet the requirements of ACCSC. After this was brought to our attention during the ACCSC visit, CTC immediately sought a solution to cover all areas to include budgeting, financial planning and relevant life skills after graduation. CTC 101 -Life Skills Seminar was created to cover Introduction to Student Loans, Personal Finance, Organization & Time Management and People Skills. CTC 102- Career Development Skills Seminar was created to cover Resume Writing Skills, Filling Out The Job Application, Job Searching Skills, Interviewing Skills and Behavior On The Job. Both courses will be integrated in the Rod Buster and Form Carpentry programs. Each student will need to complete the required work which will be graded on a pass/fail basis along with the required contact hours.

While the Commission appreciates the school's decision to incorporate modules within the curriculum to support a student's educational experience, the purpose of student services is to ensure schools are attentive to students' educational and other needs as a means to support student retention (*Section IV, Statement of Purpose, Standards of Accreditation*). Inclusion of modules does not clearly indicate how the school plans to provide assistance to students in these areas when the students are no longer in these courses. Specifically, the Commission questions the availability of student services if life circumstances will impact the student's educational success beyond the limited time in a specific course. In addition, it does not appear the student services program covers all areas as required by the *Standards of Accreditation*.

In response to the March 27, 2019 Warning letter, the school provided the updated Student Services policy which includes the areas of advising and counseling/academic advising; student records; official transcript; graduate and employment assistance; student graduate employment verification; student employment verification form; student complaints; sexual harassment; and resource, counseling, and assistance phone numbers. However, the documentation for the list of students for whom the school provided assistance during the April 1, 2019 and May 31, 2019 time period include four (4) students who signed a form indicating they had received assistance in Résumé Building which does not appear to be a service as listed in the policies and procedure manual.

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

- a. If applicable, an updated policy and procedure related to student services;
- b. A list of students for whom the school provided assistance with student services between June 1, 2019 and February 29, 2020;
- c. Appropriate documentation of the student services provided for any student listed in (a.) above; and
- d. 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 student services policy or practices.

11. CTC must demonstrate that for every program there are detailed and organized instructional outlines and course syllabi showing a scope and sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation finding with regard to instructional outlines and course syllabi, CTC stated that “all course syllabi and instructor’s guides have been redone” to remove the “block of laboratory hours in the curriculum” and assigned lecture and laboratory hours to each course. In addition, the school noted that “[t]he new curriculum are being submitted [to] the South Carolina Commission of Higher Education for final approval.”

In reviewing the updated course syllabi and instructor’s guides included with the submission in response to the TSR, the Commission found that each syllabus refers to “credits” but lists the total contact/clock hours. As such, the Commission questioned whether the courses are awarded “credit hours” despite being approved as “clock hour” only programs with ACCSC. Additionally, each syllabus includes the following sentence “[t]he instructor reserves the right to adjust the lecture and laboratory times within the [total] hour time frame to suit personal teaching style, class learning style, class size and schedule.” Based on this sentence, it is unclear if the school is in fact providing the total number of contact/clock hours in the specific lecture and laboratory setting of instruction as listed on the syllabus. In addition, the course numbering does not appear to indicate sequencing or conform to generally accepted course numbering practices in higher education. For example, in the Rob Buster program, the Level 1 courses include a seven (7) digit number (i.e., 39101-05) higher than the Level 2 courses (i.e., 27204-01). Moreover, CTC indicated that “[s]tudents will follow the new curriculum” but did not provide any documentation demonstrating notification to students of the new curriculum.

In response to the March 27, 2019 Warning letter, CTC provided documentation of notification to students of the updated curriculum for all students “enrolling on or after April 15, 2019.” However, the school did not provide an explanation for whether all students will move to the new curriculum or documentation of implementation of the new curriculum.

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

- a. An explanation for whether all students will be moving to the new curriculum as of April 15, 2019 or just those students who enroll after April 15, 2019;
 - b. The current class schedule and the class schedule from January 1, 2020 to February 29, 2020;
 - c. The transcript for any graduate who enrolled after April 15, 2019; and
 - d. 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 in this regard.
12. CTC must demonstrate compliance with recruiting and admissions requirements as outlined below:
- CTC must demonstrate that the school has in place policies and procedures and takes reasonable steps to ensure that its personnel do not make false, exaggerated, or misleading statements about the school, its personnel, its training, its services, or its accredited status and to ensure that its personnel do not make explicit or implicit promises of employment or salary prospects to prospective students (*Section IV (A)(8), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found CTC primarily relied on an in-field recruiter, [REDACTED], for recruiting activities; however, CTC did not demonstrate the use of any process to exercise oversight of recruiting activities on an ongoing basis as needed to verify the provision of accurate and appropriate information.

- CTC must demonstrate that the school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually, and maintains documentation of the review and evaluation (*Section IV (A)(9) Substantive Standards, Standards of Accreditation*). The on-site evaluation team found CTC does not conduct any documented annual compliance review of either the school’s recruiting policies or the performance of recruiting personnel.

In response to the TSR, CTC stated that the school “has adopted a new policy and procedure” to include having all staff sign the code of conduct; meeting with each staff member individually; getting input from students to inquire about statements made during the recruiting and admissions process; and maintaining documentation of the review and evaluation to occur at least once annually. To document this updated policy, the school submitted a memo dated November 12, 2018 to “CTC Staff Involved in Recruiting” which references a weekly meeting to occur at 1:00 pm in the conference room. However, the school did not submit documentation that all staff have signed the code of conduct; that each staff member is met with individually; or that the school has gathered input from students. In addition, while the updated policy does reference an annual review and evaluation, the policy does not provide any specifics as to when this will occur. Additionally, the response does not indicate whether [REDACTED] has ever had an evaluation.

As such, the Commission directed the school to submit information related to the personnel involved with recruiting. In response, CTC provided the advertisement and recruitment policies and procedures along with the Recruitment Code of Conduct and Agreement for [REDACTED]. However, the school did not provide a response to the request for clarification on how the updated policy ensures the school internally reviews and evaluation its recruiting policies and procedures and the performance of personnel involved in recurring activities at least once annually. In addition, the school did not provide any annual reviews for [REDACTED].

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

- a. Updated recruiting policies and procedures, as applicable;
 - b. Clarification on how the updated policy ensures the school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel involved in recruiting activities at least once annually;
 - c. Documentation of any annual reviews of recruiting personnel that have occurred since the on-site evaluation; and
 - d. 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 in this regard.
13. CTC must demonstrate that the school verifies prior work experience of all faculty members and administrators, as required to demonstrate compliance with applicable *Standards of Accreditation (Section III (A)(4), Substantive Standards, Standards of Accreditation)*. In response to the on-site evaluation team’s concern that CTC indicated that the school verifies prior work experience by verbally communicating with prior employers but does not maintain any documentation of this contact, CTC stated that:

Administrative staff have begun making the necessary phone calls with proper documentation as required beginning with the one new hires since the ACCSC visit. We are waiting on the documents from the prior employer. [REDACTED] is committed to hiring

verifiable qualified faculty and staff as the school grows. Previous employment history will be verified and documented including contact information.

Although it appears that the administrative staff have begun making phone calls and the school is waiting on documents, CTC did not include any additional information or documentation. In addition, the response to the TSR also does not indicate how CTC will verify and document prior work experience on an on-going basis.

In response to the March 27, 2019 Warning letter, the school provided the policies and procedures related to the employee verification process along with the completed forms. In reviewing the information provided, the Commission found that the school did not list or include employee verification forms for [REDACTED]

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

- a. Documentation that the school has verified prior work experience for [REDACTED] and [REDACTED]
- b. 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 in this regard.

14. CTC must demonstrate compliance with Program Advisory Committee ("PAC") requirements in the areas outlined below:

- CTC must demonstrate that written and detailed minutes of each meeting are maintained that include a description of all members in attendance (i.e., titles and affiliations); the date, time, and location of the meeting; and a comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee members (*Section II (A)(6)(c), Substantive Standards, Standards of Accreditation*). The TSR notes that CTC provided PAC meeting minutes from 2017-2018 that indicate the names of external members in attendance, but which lack information about members' titles and affiliations and that it is not clear whether any school employees attend the PAC meetings.
- CTC must demonstrate that Program Advisory Committee review and comment activities include at least annual review of the school's learning resources and the adequacy of facilities and equipment (*Section II (A)(6)(d)(i), Substantive Standards, Standards of Accreditation*). The TSR notes CTC's PAC meeting minutes did not reflect any discussion of the school's learning resources, facilities, or training equipment.
- CTC must demonstrate that Program Advisory Committee review and comment activities include at least annual review and comment on student graduation and employment outcomes of each program (*Section II (A)(6)(d)(ii), Substantive Standards, Standards of Accreditation*). The TSR states that although CTC's PAC meeting minutes reflect discussion of topics such as employability of graduates and market demand for labor in the construction industry, the meeting minutes do not reflect any discussion of the school's reported graduation and employment rates.

In response to the TSR, the school provided a copy of the January 1, 2019 PAC meeting minutes. In reviewing the submitted meeting minutes, the Commission found that the minutes include written and detailed description of all members in attendance; however, the meeting minutes reference [REDACTED] as an "Education Regulator" but no further description or information on their attendance at the PAC meeting. Additionally, the PAC meeting minutes include suggestions from PAC members but no evidence of consideration for PAC input as required by the *Standards of Accreditation*.

In addition, the outline for the second meeting per year, to be held June 25, 2019, indicates that a review of student achievement and learning resources will occur then. As such, the March 27, 2019 Warning letter directed CTC to provide a copy of the June 25, 2019 PAC meeting minutes along with an explanation of the Education Regulators in attendance, and evidence that the school gives consideration to PAC input.

In response to the March 27, 2019 Warning letter, the school provided a copy of the June 12, 2019 PAC meeting minutes; the policies and procedures for the PAC, and the IAIP as evidence the school gives consideration to PAC input. In reviewing the information provided, the Commission found that the PAC did not appear to review the length of the program; equipment; learning resource system; or specific student achievement rates. In addition, the school did not provide an explanation of the background for the “Education Regulators” who serve on the PAC.

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

- a. Meeting minutes of all PAC meetings held for all programs between January 1, 2019 and February 29, 2020 clearly organized by program or program area and each set of minutes must include the following:
 - i. A description of each member in attendance (i.e., titles and affiliations) and a notation as to which members in attendance represent the employment community or are practitioners;
 - ii. The date, time, and location of each meeting;
 - iii. A comprehensive and clear description of the review of and commentary made by the PAC members to demonstrate review of all items listed in *Section II (A)(6)(d), Substantive Standards, Standards of Accreditation*; and
 - iv. Evidence the school gives consideration to PAC input;
 - b. An explanation for the background of the Education Regulators and the appropriateness for their serving on the PAC;
 - c. The proposed 2020 dates for the PAC meetings; and
 - d. 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 in this regard.
15. CTC must demonstrate that all machinery and training equipment is provided with proper safety devices, which are in working order and used whenever the machinery and equipment is operated (*Section II (A)(5)(d), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team’s concern that a majority of students were not wearing safety glasses/goggles while engaging in activities such as hammering, sawing, and other metal and woodwork, CTC “created a safety glass box” along with not continuing to allow students to take the safety glasses home. In addition, the school created a policy titled, Safety Glasses Policy & Consequences, with three (3) consequences as stated in the Student Catalog. However, CTC did not provide any documentation to demonstrate implementation of the consequences. In addition, the January 1, 2019 Program Advisory Committee Meeting minutes include the following comment within the equipment and facilities section where “members walked out into the laboratory and equipment room”:

██████████ stated that CTC instructors should make sure all students keep their safety glasses on at all time while in laboratory and make sure they have on steel toe shoes. ██████████
██████████ ensured the committee members that the instructors will make sure that all students are safe within the laboratory.

Therefore, the March 27, 2019 Warning letter directed CTC to submit documentation to demonstrate the implementation of the consequences per the Safety Glasses Policy & Consequences along with any additional monitoring or policies enacted by the school to ensure student safety.

In response to the March 27, 2019 Warning letter, the school provided the policies and procedures related to safety glasses along with the Safety Glass Monitoring Check List Violation Form. The updated policy and procedure indicates that the consequences for not wearing safety glasses include a warning for the first offense, not participating in lab for the second offense, repurchasing safety glasses for the third offense, and receiving a failing grade for the fourth offense. The Commission acknowledged and appreciated CTC's efforts in relation to student safety, however, given the previous concerns surrounding student safety, the Commission determined that additional information is warranted in order to provide the school with an additional opportunity to demonstrate the implementation of the updated policy and form. As such, as may be available please provide any completed Safety Glass Monitoring Check List Violation Forms along with documentation of any students who received a warning, were unable to participate in laboratory, or received a failing grade since the submission of the response to the March 27, 2019 Warning letter.

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.

CTC 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.⁴ 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.

⁴ 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.

CTC 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 5, 2020**. If a response, the required fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before March 5, 2020**, 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,

[REDACTED]
Michale S. McComis, Ed.D.
Executive Director

c:

[REDACTED]
[REDACTED]
Encl: ACCSC ACCSC Refund Report Summary Sheet
ACCSC Refund Report Worksheet and Glossary

⁵ ACCSC assesses a \$500 processing fee to a school placed on Warning.

REFUND REPORT WORKSHEET

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

Name of student: _____ Date of enrollment: _____

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

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

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

Attach to the school's submission:

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

Attach to this worksheet:

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

THE REFUND REPORT WORKSHEET GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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