



Accrediting Commission of Career Schools and Colleges

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March 27, 2019

**ELECTRONIC DELIVERY**

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

**School #M072307**  
**Warning Letter**

Dear ██████████

At the February 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation submitted by Construction Training Center (“CTC”) located in Columbia, South Carolina. Upon review of the November 21, 2018 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to place CTC on **Warning** with a subsequent review scheduled for ACCSC’s **August 2019** 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 that remain in this Warning letter; and CTC agreeing “that the school has not demonstrated administrative capacity sufficient to ensure operation of the school in compliance,” the Commission determined that CTC’s leadership has not demonstrated administrative capacity sufficient to ensure operation of the school in compliance with *Accrediting Standards*. Additionally, the Commission noted that while “██████████ is committed to being in compliance and having a qualified administrative staff,” the Renewal Workshop attendees included ██████████, Vice President/Financial Aid Director, and ██████████, Director of Students, rather than ██████████. In order to ensure the school management has had an additional opportunity to grasp the basic principles and expectations of ACCSC’s accrediting standards, the Commission directs ██████████ to attend the Accreditation Workshop in June 2019.

In addition, in response to the on-site evaluation team’s concern that school managers expressed a lack of awareness of accrediting standards and institutional practices in many areas of operation, CTC stated that “[t]he school is in the process of capacity building by requiring administrative staff to read and become familiar with the Standards of Accreditation, especially those pertaining to their jobs” and that “[t]he school is beginning to see it’s direction towards compliance as each administrative staff member is becoming familiar with the Accrediting Standards.” Additionally, CTC noted that “[w]hile there are administrative staff members with the appropriate degrees, education and experience for their current positions, the absence of documentation along with not having knowledge of Accrediting Standards caused disqualification.” However, the school did not provide any specific information beyond this statement or documentation of implementation (i.e., planning, timelines, professional development plans, etc.) to demonstrate that the administrative staff members possess the appropriate degrees, education and experience for their current positions or increased familiarity with the *Standards of Accreditation*.

Additionally, in response to the on-site evaluation team's concern that school staff provided conflicting statements regarding the role, members, and meeting frequency of the Board of Directors, the school created "a new Board of Directors" and stated that "no member of the Board of Directors will be related to employees of the school to prevent any conflict of interest." However, CTC did not provide any information pertaining to the new Board of Directors.

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

- a. Documentation to demonstrate [REDACTED] attended the Accreditation Workshop in June 2019;
  - b. An organization chart listing all management and administrative staff by name and title;
  - c. Completed job descriptions for each position listed on the organization chart;
  - d. Information and documentation, as applicable, to demonstrate how each staff member is qualified for their position;
  - e. A listing of the new Board of Directors, including name, title, and organization;
  - f. Any information pertaining to the role of the Board of Directors;
  - g. Meeting minutes and agendas, as applicable, for any Board of Directors meeting held since the submission of the response to the November 21, 2018 TSR;
  - h. Meeting dates for any upcoming Board of Directors meeting in 2019; 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 most of CTC's managers and administrative staff members participated in at least one professional development activity in 2017. However, this appeared to the team to be isolated activity rather than an ongoing pattern 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, "Vice President [REDACTED] and Director of Students [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.

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

- a. The school's professional development plan and expectations for management and administrative employees;
- b. Evidence the management and administrative employees engage in ongoing development and training activities;
- 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 does 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 Commission directs the school to provide a copy of the Policies and Procedures Manual and reminds the school that the operational policies and procedures should address all functional areas within the school. Of note, many of the concerns listed in this Warning letter refer to policies and procedures which are likely to be included in this manual. As such, the Commission directs the school to submit one copy of the manual with page number references rather than including a copy of each policy and procedure as part of the responses to each individual area cited herein. In addition, submit the school's catalog fully cross-reference to the ACCSC Catalog Checklist and the school's enrollment agreement fully cross referenced to the Enrollment Agreement Checklist.

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], 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 time frame 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] 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 aid [sic] 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.

While the Commission recognized the school's efforts to correct the previously identified discrepancies with regard to refunds, the Commission cannot overlook that it appears the school has never processed a refund correctly. As such, the Commission is 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 calculation of the forty (40) days requirement, specifically, how the school is utilizing the last documented date of attendance versus a formal termination date;
  - c. A reference as to where 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 list of all personnel who process refunds along with documentation of their training on the updated refund policy;
  - g. An ACCSC Refund Report for all refunds issued to students who were either dismissed or withdrew between January 1, 2019 and May 31, 2019 to include the enclosed the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records to include documentation of approved leave of absences (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds;
  - h. 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
  - 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 regarding the school's refund policy or practices.
5. CTC must demonstrate that the school monitors its budgetary projections in relation to actual income and expenses on a regular basis throughout the fiscal year (*Section I (C)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team reviewed the financial audit from [REDACTED] CPA, covering fiscal years 2016 and 2017 where the auditor noted two areas of concern that were examined and validated by the on-site team during their review including:
- The school's internal books of account do not appear to be updated in a timely manner and
  - The school's Bank and General Ledger Accounts do not appear to be reconciled in a timely manner.

In addition, the on-site evaluation team noted that CTC lacks established policies and procedures regarding reconciliation of expenses as necessary to ensure accuracy of financial statements.

In response to the TSR, CTC stated that "after being informed by the auditor the school acted immediately and updated Accounting Procedure Changes" and provided a copy of the February 16, 2017 memo which "serves to document some accounting 'conventions'" with suggestions and examples along with noting "[t]hese changes can be discussed further in a couple of weeks." However, the school did not provide any documentation that these changes were implemented.

Additionally, CTC provided a January 25, 2018 Memo titled “DOE Payment Process Procedures” that describes how the “Bank Accounts and General Ledger Accounts are being updated on a weekly and monthly basis and all accounts are Reconciled in Quick Books monthly and sent to the CEO ( [REDACTED] ) for review and Approval” along with a copy of the current CTC Budget. However, upon review of the submission the Commission found that the school did not provide any documentation of implementation of the new policy and that the budget does not compare the projections to actual income and expenses. Specifically, while the CTC budget does list Total Income, Budget Expenses, Total Expenses, and Net Income Before Taxes, the total expenses are not compared to the budgeted expenses and there is no information on estimated revenue. In addition, the Commission noted that the Total Expenses for February 2018, March 2018, April, 2018 May 2018, and June 2018 are exactly the same [REDACTED] and without the breakout of the expenses, it is unclear whether these totals accurately reflect the monthly spending.

Moreover, in conjunction with the refund concerns as listed previously in this letter, the Commission is interested in obtaining additional information on the qualifications of those responsible for the financial oversight of the institution, in particular, [REDACTED] (Vice President) and [REDACTED] (Chief Financial Officer). Based on the foregoing, the Commission directs CTC to submit the following:

- a. A reference as to where the school’s budget policies and procedures are included in the Policies and Procedures Manual;
  - b. An explanation with documentation showing how [REDACTED] (Vice President) and [REDACTED] (Chief Financial Officer) are qualified for their particular roles who possess the appropriate education, training, and experience commensurate with the level of their responsibilities;
  - c. The school’s financial budget that consists of an estimation of the revenue and expenses for the 2019 fiscal year;
  - d. A budget-to-actual analysis showing that CTC is monitoring its budgetary projections in relation to actual income and expenses on a regular basis for the period January 1, 2019 through May 31, 2019;
  - e. An explanation as to how the incorrectly processed refunds (*See #4 above*) may impact the budget along with planning, if applicable, on repayment of additional funds; and
  - f. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards in this regard.
6. CTC must demonstrate that the school publishes in its catalog and enforces a policy of acceptable student attendance. The policy must promote sufficient levels of student attendance such that the required knowledge, skills, and competencies can be reasonably achieved (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team had the following concerns related to attendance and the attendance policy:
- The policy does not appear to include any provision to withdraw a student who is absent for fourteen consecutive days, as required by federal Title IV regulations;
  - The policy is inconsistently stated in the school catalog and does not clearly appear to be enforced;
  - The policy indicates that students will be notified with an Attendance Notification Form after three unexcused absences; however, the team observed no evidence of such notifications in student files and the school was unable to provide examples of any such notifications;

- The team noted several examples that indicated the student to be making satisfactory progress despite having already recorded absences in excess of 40% of the total program hours; and
- The team found a notable discrepancy between reported enrollments and observed attendance during the on-site review (i.e., CTC reported a current student population of 31, however the team observed only 11 students present at the school on November 6, 2018 and only 12 students in attendance on November 7, 2018).

In response to the on-site evaluation team's concerns, CTC stated that "[t]he school made a major mistake in assuming that a student was compliant if he or she did not miss more than 20% (26 days) of the entire program." In addition, the school updated the attendance policy to indicate that "20% of the time a student has been enrolled rather than the entire program" and implemented the policy that "an unofficial SAP attendance check will occur for each student at every quarter of possible contact hours they should have acquired." The school, however, did not provide any documentation to demonstrate implementation of the corrective action or training completed by individuals involved with attendance monitoring. While CTC states that, "Administrative staff will be more diligent in sending warning letters to students who have missed three consecutive days," the school did not provide any examples of warning letters sent to students. Additionally, CTC did not demonstrate notification to students of the change in the attendance policy.

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

- a. A reference as to where the school's attendance policy is found in the catalog;
  - b. A reference as to where the school's attendance policies and procedures are found in the Policies and Procedures Manual;
  - c. A list of all personnel who monitor attendance along with documentation of their training on the updated attendance policy;
  - d. Documentation to demonstrate students have been notified of the change to the attendance policy;
  - e. Any warning letters sent to students who have missed three (3) consecutive days since the submission of the TSR response;
  - f. Documentation to demonstrate the unofficial SAP attendance check is being completed;
  - g. Attendance records for the week of June 2, 2019 through June 8, 2019 along with a list of the current students for this period and any warning letters sent, as applicable; and
  - h. 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 attendance policy or practices.
7. CTC must demonstrate that the school terminates students who do not return following a leave of absence and apply 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 the student

signed the Leave of Absence Form on September 18, 2018 with a Scheduled Return Date of October 30, 2018 which does not conform to the school’s policy that a leave of absence may not exceed 30 days.

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

- a. A reference as to where the school’s leave of absence policy is found in the school catalog;
  - b. A reference to where (i.e., page number) the school’s leave of absence policies and procedures can be found in the Policies and Procedures Manual;
  - c. A list of all personnel who conduct leaves of absence along with documentation of their training on the updated policy;
  - d. A list of students who requested and took a leave of absence between April 1, 2019 and May 31, 2019;
  - e. Appropriate documentation of the leave of absence for any student listed in (d.) above; and
  - f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding the school’s leave of absence policy or practices.
8. 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 TSR using a November 2018 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)	6*	49%	73%	43%	70%
Rod Buster (Diploma)	6*	51%	73%	40%	

\* This program was 4 months in length on the 2018 Annual Report.

The Commission found that CTC reported graduation rates and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.<sup>1</sup> Additionally, upon review of the G&E Charts and supporting documentation provided by the school, the Commission found the school incorrectly completed the G&E Charts. Specifically, while using a November 2018 Report Date on the G&E Charts requests data on cohorts who started between November 2016 and October 2017, the school provided data on cohorts who started between December 2017 and November 2018 resulting in many of the students remaining active with the school. The intent of the G&E Chart is to gather data on cohorts who have completed their programs with the institution. In addition, the Commission reminds CTC that all of the boxes in the calculation checks located in the middle of the G&E Chart should include a zero (0) in the fields and that any boxes with a value other zero (0) indicate an error within the chart. Furthermore, the Commission questioned why the information reported on the 2018 Annual Report indicated each program was four (4) months in length but the G&E Charts submitted as part of the TSR response indicate each program is six (6) months in length.

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

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

- a. An explanation for why the Form Carpentry program and Rod Buster program were listed as four (4) month programs on the ACCSC 2018 Annual Report but listed as six (6) month programs in response to the TSR;
- b. A Graduation and Employment Chart for the Form Carpentry program and Rod Buster program using **January 2019** 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:

Student ID#	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 field<sup>2</sup> (line #14), provide the following information:

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

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:

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

v. 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	Graduation Date	Classification on the G&E Chart	Reason	Description of the Documentation on File

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.

Of note, ACCSC has issued a module of the **Blueprints for Success Series – [The Graduation and Employment Chart](#)** – which provides information on how to complete a Graduation and Employment Chart. ACCSC encourages the school to review this module when formulating its response to this concern. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).

- 9. 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*

<sup>2</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

<sup>3</sup> Appendix VII (4)(a) Guidelines for Employment Classification requires the school to verify the employment classification.

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, Vice President ██████ 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.” The Commission reminds CTC that the school is only required to engage an independent third-party for verification of graduate employment records as part of the process for Renewal of Accreditation and that a school may choose to have all graduate employment records verified on an on-going basis but is **not required** [emphasis added] to have all graduate employment records verified on an on-going basis.

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."

10. 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 does not consider the lack of understanding as a valid reason. As such, the Commission is interested in obtaining information on the ongoing process and the implementation of the new policy and procedures.

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

- a. A reference as to where the school's initial employment verification policies and procedures are found in the Policies and Procedures Manual;
- b. A copy of the current verification form or other tools the school is currently utilizing to verify employment;
- c. For each graduate who gained employment between March 1, 2019 thru May 31, 2019 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

- d. The school must provide the following supplementary information:
- i. The school’s completed verification form (as indicated in item (b.) above) for each graduate employed listed in (c.) 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
  - e. 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.

11. 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*.

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

- a. A reference as to where the school's ongoing faculty assessment and professional development policies and procedures are found in the Policies and Procedures Manual;
  - b. 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;
  - c. A list of current faculty members and educational administrators and a 2019 plan for each person along with evidence for any activities completed;
  - 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 that the school engages in significant and ongoing institutional assessment and improvement activities and planning (*Section I (B)(1), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CTC provided an Institutional Assessment and Improvement Plan ("IAIP") in the Self Evaluation Report that appeared to be adequate based on the size and scale of the school's operations. However, during the on-site review, CTC's managers were unable to speak to the school's IAIP development process or use of the plan. In response to the TSR, CTC stated the following:

*The Institutional Assessment and Improvement Plan that was provided in the Self Evaluation Report has been utilized in some areas but have not been properly documented. The current IAIP development process is being revisited and modified to be fully utilized in the improvement of the school. Some facets of the plan have been carried out in faculty/ staff meetings but not documented. CTC is making every effort to document all activity associated with institutional assessment and improvement. The Institutional Assessment and Improvement Plan will be updated annually.*

However, the school did not provide any documentation to substantiate utilization of the previously provided IAIP or any specific information on the revision to the IAIP process. As such, the Commission directs CTC to submit the following:

- a. The school's current IAIP;
  - b. A reference as to where IAIP policies and procedures are found in the Policies and Procedures Manual;
  - c. Meeting minutes, as applicable, to demonstrate the facets of the plan that have been completed;
  - d. Any additional documentation, as applicable, to demonstrate implementation of the plan; 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 in this regard.
13. 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*.

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

- a. A copy of the school's student services program policy as listed in the student catalog or, alternately, if a copy of the full student catalog is included with this response, the location (i.e., page number) of the policy within the catalog;
  - b. A reference as to where student services program policies and procedures are found in the Policies and Procedures Manual;
  - c. A list of all personnel who operate the student services program along with documentation of their training on the updated policy;
  - d. A list of students for whom the school provided assistance with student services between April 1, 2019 and May 31, 2019;
  - e. Appropriate documentation of the student services provided for any student listed in (d.) above; and
  - f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards regarding the school's student services policy or practices.
14. 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, the Commission found that each syllabus refers to “credits” but lists the total contact hours and as such questioned whether the courses are offered for credit 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 students are training for the specific lecture and laboratory hours as listed on the syllabus. In addition, the course numbering does not appear to indicate sequencing or conform to generally accepted 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.

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

- a. An update on the submission of the new curriculum to the South Carolina Commission of Higher Education and copies of the approvals, if applicable;
  - b. An explanation on the reference to credits on the syllabi along with sample syllabi from each program demonstrating changes, if applicable;
  - c. An updated course listing to demonstrate course numbering indicates sequencing and conforms to generally accepted practices in higher education;
  - d. An explanation as to the allowance of instructors to adjust the lecture and laboratory times;
  - e. Documentation to demonstrate notification to students of the new curriculum format; 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 in this regard.
15. 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 relies 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.

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

- a. A reference as to where the school’s recruiting policies and procedures are included in the Policies and Procedures Manual;
  - 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. A list of all personnel involved with recruiting along with a signed code of conduct policy;
  - d. Documentation of the individual meetings with each staff member listed in (c.) above, if applicable;
  - e. Documentation of the weekly meetings with all staff involved in recruiting;
  - f. Documentation of any annual reviews of recruiting personnel that have occurred since the on-site evaluation;
  - g. The policy and procedure for oversight of the in-field recruiter and whether this person attends the weekly meetings;
  - h. Copies of any scripts, flyers, and promotional materials used by in-field recruiters; 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.
16. 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. Vice President [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 the administrative staff have begun making phone calls and the school is waiting on documents, no additional information or documentation was included with the response. In addition, the response does not include how CTC will verify and document prior work experience on an on-going basis.

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

- a. A reference as to where the school's policies and procedures for verifying prior work experience are included in the Policies and Procedures Manual;
- b. A list of all current faculty members and administrators along with documentation that the school has verified prior work experience for each person; 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 accrediting standards in this regard.

17. 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 Commission directs 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.

18. CTC must demonstrate compliance with learning resource system requirements in the areas outlined below:

- CTC must demonstrate that the school's learning resource system 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 each program and include 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 (*Section II (A)(7)(a) Substantive Standards, Standards of Accreditation*). The on-site evaluation team found CTC lacked adequate learning resources to support the programs offered. In addition, CTC indicated that the nearby Richland County public library branch is available for students, but did not demonstrate that the library possesses materials appropriate to support postsecondary education and research in the areas of Rod Busting or Form Carpentry.

- CTC must demonstrate that use of the learning resource system materials is integrated into the school's curriculum and program requirements as a mechanism to enhance the educational process and to facilitate positive learning outcomes for students (*Section II (A)(7)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that use of the learning resource system is not integrated into the school's program requirements as required due to learning resources being referenced in instructor lesson plans as additional resources, and that "[r]eading those resources are not a requirement to pass any of the classes."
- CTC must demonstrate that the school has written policies and procedures for the ongoing development of its learning resource system as part of its institutional improvement program. A school must demonstrate sufficient support and budgetary allocations for the learning resource system (*Section II (A)(7)(e), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that although CTC's IAIP includes goals applicable to the attainment of additional computers for the school's learning resource system, the school did not utilize any established policies and procedures regarding development of the learning resource system. Additionally, the school's budget did not clearly label any expenditures related to the learning resource system.

In response to the TSR, the school stated that:

*CTC is making a list of suggested articles as recommended by NCCER for each course. The students will engage in reading these online resources on their own electronic devices and school laptops during designated times during lecture or lab as described in the instructor's guide. Students will not be graded on material learned from the online articles. In addition President [REDACTED] has committed to purchasing new subscriptions of Industry related journals. The school no longer suggest the use of the Richland Public Library new door as a part of the learning resource system. All reading can be completed on campus. CTC will continue to upgrade the learning resource system with additional laptops for students use and expanding updated industry magazines*

Based on this response, the Commission has the following concerns:

- It is unclear the suggested articles from NCCER will be sufficient in quantity and scope to meet the educational objectives of each program and adequately serve the student body;
- As students will not be graded on material from the online articles, it is unclear how use of the learning resource system materials are integrated in to the school's curriculum as a mechanism to enhance the educational process and to facilitate positive learning outcomes for students;
- The commitment to purchasing new subscriptions does not indicate any current expansion of the learning resource system; and

- The intent to expand updated industry magazines does not appear to be a written policy and procedure for the ongoing development of the learning resource system.

As such, the Commission directs CTC to submit the following:

- a. A reference as to where the school's learning resource policies and procedures are included in the Policies and Procedures Manual;
  - b. An explanation for how the school's policies and procedures include ongoing development of the learning resource system;
  - c. A narrative for how the school's learning resource system 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 to serve the student body;
  - d. A justification for how the use of the learning resource system materials are integrated into the school's curriculum and program requirements as a mechanism to enhance the educational process and to facilitate positive learning outcomes for students;
  - e. A summary of the review by the Program Advisory Committee of the appropriateness and adequacy of the learning resource materials;
  - f. An inventory of all the current learning resource materials to include publication dates;
  - g. Updated syllabi from each program demonstrating integration of the learning resource system along with evidence of completed learning resource activities;
  - h. An updated budget demonstrating the estimated expenditures compared to the actual expenditures related to the learning resource system for the period of January 1, 2019 to May 31, 2019; 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.
19. CTC must demonstrate that the school maintains documentation covering the last five years that demonstrates that admission requirements have been met or that explains the basis for any denial of admission (*Section V (A)(5), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team's concern that the school does not maintain records of students who were denied admission, CTC stated that:

*There was a miscommunication between the team member and CTC staff. Construction Training Center uses the third-party [REDACTED] database for students who have met or who haven't met the requirements for admission and it clearly states why the student was denied admission. See Attachment Construction Training Center Decline VFAO*

However, the attachment was not included with the submission and, therefore, the Commission was unable to review whether the school maintains these records. As such, the Commission directs CTC to submit the following:

- a. A reference as to where the school's denied admissions policies and procedures are included in the Policies and Procedures Manual;
- b. A list of all prospective students who have been denied admissions since the on-site evaluation;
- c. Documentation to demonstrate why each of the prospective students as listed in (b.) above were denied admissions;

- 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.

20. CTC must demonstrate that the school discloses the graduation and graduate employment rate for each program offered as last reported to the Commission (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team's concern that the school managers indicated that CTC does not disclose student achievement rates to students, applicants, or other members of the public, CTC stated the following:

*Prior to the onsite evaluation, the school verbally disclosed the student achievement rates to students and applicants. However, the school didn't have the student achievement rates in the student catalog nor the school website. The school have put in plan that once the school have reported the graduation and graduate employment rate for each program the Director of Students will immediately update the student catalog and school website See Policy & Procedures. As reference in our response, we have implemented a new policy regarding student achievements.*

However, in reviewing the response, the policies and procedures related to the disclosures were not included for review. In addition, a review of the included catalog and website ([www.ctcworks.com](http://www.ctcworks.com)) did not appear to include the current graduation and graduate employment rate for each program offered as last reported to the Commission.

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

- a. A reference as to where the school's current disclosure is included in the catalog;
  - b. A reference as to where the school's disclosure policies and procedures are included in the Policies and Procedures Manual;
  - c. Documentation to demonstrate any additional locations of the disclosure; 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.
21. CTC must demonstrate that the school's publication of accreditation complies with the Instructions for Disclosure and Advertising of Accredited Status form (*Section IV (B)(6), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team's concern that the school utilized the phrase "fully accredited" in numerous advertising and promotional materials, including the website, CTC stated that the school "has deleted the phrase 'Fully Accredited' on the website ([www.ctcworks.com](http://www.ctcworks.com))" and "will no longer use the promotional flyer with the phrase 'Fully Accredited.'" While the website [www.ctcworks.com](http://www.ctcworks.com) does not include the term "Fully Accredited," the website [www.constructiontrainingcenter.org](http://www.constructiontrainingcenter.org) does not appear to have been updated to remove the term "Fully Accredited." As such, the Commission directs CTC to update all versions of the website.
  22. CTC must demonstrate that all programs offered by the school that fall within the Commission's scope must be approved by the Commission (*Section I (B)(2)(a), Rules of Process and Procedure, Standards of Accreditation*) and that the school may not describe in its catalog, advertise, or promote new programs prior to receiving written Commission approval (*Section IV (B)(8), Substantive Standards, Standards of Accreditation*). A review of the updated website ([www.ctcworks.com](http://www.ctcworks.com)) indicates three (3) programs including Form Carpentry and Rod Buster which match ACCSC approvals and the [www.constructiontrainingcenter.org](http://www.constructiontrainingcenter.org) website along with "General Construction Craft Laborer (NCCER Certified)" which is not approved by the Commission. Under the "Tuition & Fees" section of the

updated website is the statement “All programs (240-900 contact hours),” however, the Commission has not approved any programs at less than 900 contact hours. In addition, the January 1, 2019 Program Advisory Committee minutes reference a discussion about a “shorter program for labors” and the response from [REDACTED] that “an application for a new program will have to be completed and approve (*sic*) before CTC can add the program for labors.” As such, the Commission seeks clarification on the reference to the General Construction Craft Laborer (NCCER Certified) program on the school’s website. The Commission reminds CTC that if this coursework is continuing education or avocational coursework that a school may not advertise secondary educational objectives in a manner that would represent those courses as within the scope of the school’s ACCSC institutional accreditation unless and until the school has applied for and received Commission approval for such course to be included within that scope (*Section II (D)(1)(b), Substantive Standards, Standards of Accreditation*).

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

- a. An explanation for the inclusion of the General Construction Craft Laborer (NCCER Certified) program on the school’s website;
  - b. If applicable, a copy the submitted Application for a New Non-Degree Program or Application for Continuing Education and Avocational Courses;
  - c. If applicable, documentation to demonstrate removal of the program from the website;
  - d. A list of any students who have graduated, withdrawn, or are currently enrolled in the General Construction Craft Laborer (NCCER Certified) program;
  - e. If applicable, documentation to demonstrate a cessation of enrollment in the General Construction Craft Laborer (NCCER Certified) program until the program is approved; 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 in this regard.
23. 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:”

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

Therefore, the Commission directs 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.

24. CTC must demonstrate that all facilities owned or controlled for administrative and instructional purposes meet fire safety standards required by appropriate regulatory authorities (*Section I (F)(3) Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team’s finding that the fire safety inspection performed during the on-site review appeared to identify at least seven outstanding fire safety violations, CTC stated that the school will ensure inspections occur on a semiannual basis and that “[t]he owner (Word of God) corrected all outstanding violations” along with providing a copy of the Fire Inspection Report. In reviewing the fire inspection report, the Commission noted the report includes page one (1 of 3) and three (3 of 3) but is missing page two (2 of 3). Additionally, page one (1 of 3) includes a Proactive Inspection section that lists “Fail” for the Fire Extinguisher and Emergency Lights but does not provide any further explanation on these areas.

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

- a. A copy of the December 13, 2018 Inspection report including all three (3) pages;
- b. An explanation for the fail designation in the proactive inspection section along with any corrections the school or owner has made;
- c. The date of the next semiannual fire inspection and resulting report, if applicable; 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.

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### **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.<sup>4</sup> If the school’s response contains documentation that includes personal or

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<sup>4</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-

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.

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 June 28, 2019**. If a response, the required fee,<sup>5</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission’s office **on or before June 28, 2019**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED] or [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

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documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).

<sup>5</sup> 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:	
<b>(a) Last date of attendance</b>	
<b>(b) Date of determination of termination/withdrawal</b>	
Date of refund disbursement:	
The actual number of days between (a) or (b) above and the date the school disbursed the refund:	

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

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

Attach to the school's submission:

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

Attach to this worksheet:

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

## THE REFUND REPORT WORKSHEET GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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