

March 27, 2019

ELECTRONIC DELIVERY

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

School #B070897
Warning

Dear ██████████

At the February 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered:

- The Commission’s previous decision to place Educational Technical College located in San Sebastian, Puerto Rico on Probation;
- Educational Technical College’s Application for Renewal of Accreditation; and
- Student achievement data included in the school’s 2018 Annual Report Rates.

Based upon the September 6, 2018 Probation Order, the November 19, 2018 letter regarding student achievement rates reporting in the 2018 Annual Report, and Educational Technical College’s respective responses, the Commission voted to vacate the Probation Order and place the school on **Warning** with a subsequent review scheduled for ACCSC’s **November 2019** meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commission’s Review

August 2016

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

November 2016

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

February 2017

The Commission considered the previous decision to defer action on the Application for Renewal of Accreditation in conjunction with the supplemental 2016 Annual Report student achievement data and voted to again defer final action based on ongoing questions regarding the school’s compliance with accrediting standards in the areas of student achievement outcomes, licensure pass rates, employment classifications, instructional materials, and refund policy. The Commission noted below benchmark rates for Information Processing Specialist with Medical Billing program and the Respiratory Care Technician program. The Commission also questioned the efforts taken by the school to improve licensure examination

pass rates for the Practical Nursing, Basic Cosmetology, and Respiratory Care Technician programs. Additionally, the Commission questioned the employment classifications for the Practical Nursing and Respiratory Care Technician programs and required an update regarding the graduation and employment rates with misclassification removed from the school's data.

August 2017

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

August 2018

The Commission considered the previous decision to place Educational Technical College on Warning. Upon review of the school's response to the April 4, 2018 Warning Order, the Commission voted to place the school on Probation. The Commission's decision was based on the continued low graduation and employment rates reported by the school for the Information Processing Specialist with Medical Billing, Respiratory Care Technician, Practical Nursing, Basic Cosmetology, Child Care and Development Assistant, and Electricity programs using a May 2018 Report Date on the Graduation and Employment Charts and questions regarding if the school was implementing the official refund and Leave of Absence policies. In addition, the Commission questioned the results of the school's viability study that indicated the Practical Nursing and Information Processing Specialist with Medical Billing programs may not be viable in Puerto Rico. In addition, given Educational Technical College's change of location and the school's expectation that the new location of the school in Lares would positively affect the school by increasing student population and employment demands for the graduates, the Commission provided Educational Technical College with an opportunity to demonstrate the positive outcomes at the Lares location.

February 2019 Commission Review and Action

1. Educational Technical College must demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the Commission's September 6, 2018 Probation Order, Educational Technical College reported the following student achievement rates on Graduation and Employment Charts prepared using a December 2018 Report Date:

San Sebastian					
Program (Credential)	Length Mos.	Graduation Rate	ACCSC Benchmark Graduation Rate	Employment Rate	ACCSC Benchmark Employment Rate
Information Processing Specialist with Medical Billing (Diploma)	12	44%	55%	71%	70%
Child Care and Development Assistant (Diploma)	13	100%	50%	44%	
Practical Nursing (Diploma)	13	52%	50%	67%	
Basic Cosmetology (Diploma)	13	40%	50%	63%	

Lares					
Program (Credential)	Length Mos.	Graduation Rate	ACCSC Benchmark Graduation Rate	Employment Rate	ACCSC Benchmark Employment Rate
Information Processing Specialist with Medical Billing (Diploma)	12	44%	55%	50%	70%
Electricity (Diploma)	13	30%	50%	67%	
Basic Cosmetology (Diploma)	13	40%	50%	88%	

In addition, in response to the November 19, 2018 letter regarding the 2018 Annual Report, the school reported the following graduation and employment rates using a July 2019 Report Date:

Program (Credential)	Length Mos.	Graduation Rate	ACCSC Benchmark Graduation Rate	Employment Rate	ACCSC Benchmark Employment Rate
Information Systems and Computer Repair Technician (Diploma)	12	30%	55%	67%	70%

The Commission found that the school reported the graduation and employment rates as highlighted above falls below ACCSC’s student achievement benchmark rates.¹ In response to the September 6, 2018 letter, Educational Technical College provided an update regarding the factors impacting student achievement. The school identified areas for improvement including student services, transportation, costs of education, student retention, academic support, and funds to provide to students for provisional and professional licensures. Specifically, Educational Technical College stated that the school provides buses to pick-up and drop-off students and created a program that provides students with work opportunities to earn money to cover portions of the students’ education. Additionally, Educational Technical College’s response states that school staff assists students with the provisional license application process as well as securing dates, providing transportation to students for the licensing exam, and picking up the copies of exam results and professional licenses for the students. In some cases, the school also pays the costs of

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

applications, exams and licenses for its students and graduates if students demonstrate the need for such financial assistance.

Educational Technical College also provided a list of graduates who moved outside of Puerto Rico for the period of July 1, 2018 to November 30, 2018 as well as details regarding how the school accommodated each graduate to gain related employment. The Commission noted that the provided list includes two graduates and four withdrawn students who moved outside of Puerto Rico. For the two graduates, Educational Technical College documented that one graduate gained related employment in the state of Florida but that the school was unable to obtain an update regarding the status of the second graduate. The Commission noted that the four withdrawn students have not reenrolled at the school and currently reside appear to outside of Puerto Rico.

Furthermore, specifically regarding the Information Systems and Computer Repair Technician (Diploma) program, Educational Technical College stated that the aforementioned reported graduation and employment rates reflect only the San Sebastian enrollments and that all students who enrolled in the program at the San Sebastian location graduated from the school. Educational Technical College also indicated that the school plans to offer the program at the Lares location and believes that the new location will contribute to an increase in student achievement rates. Educational Technical College also stated that the data reported in the recent Graduation and Employment Charts for the Information Systems and Computer Repair Technician (Diploma) program reflects a small student cohort with a total of nine enrollments and three graduates. The Commission acknowledged the small number of enrollments and that of the three graduates, the school reported two graduates as employed in the field thus resulting in the 67% employment rate. The Commission remains interested in the strategies Educational Technical College plans to implement at the Lares location to increase student enrollment and overall student achievement rates for the Information Systems and Computer Repair Technician (Diploma) program.

The Commission previously determined that it was imperative for Educational Technical College to demonstrate that the school's programs are viable and for any programs that the school deems not to be viable, the Commission required the school to submit a Programmatic Teach-out Plan Agreement Form. In response, Educational Technical stated that the school determined it is not appropriate at this time to discontinue the school's programs as the school is showing positive enrollment trends at the new Lares location. Furthermore, Educational Technical College stated that total enrollments at the San Sebastian location decreased from 283 students in 2013 to 81 students in 2017 and that the Lares location has demonstrated stable enrollments with only a slight decrease in enrollments from 98 student in 2017 to 93 students in 2018. Educational Technical College also stated that given the positive retention results and the enhancements made to the services and licensing support provided to students at the Lares location, Educational Technical College expects graduation and employment rates to increase.

In addition, Educational Technical College provided the following retention rates using a December 2018 Report Date:

Program (Credential)	June 2018 Report Date	December 2018 Report Date
Information Processing Specialist with Medical Billing (Diploma)	100% retention	100% retention
Practical Nursing (Diploma)	100% retention	91% retention
Basic Cosmetology (Diploma)	67% retention	89% retention
Electricity (Diploma)	100% retention	86% retention

Educational Technical College stated that the school was unable to provide contemporaneous retention data for the Information Systems and Computer Repair Technician (Diploma) program since the program was not active at the San Sebastian location at the time of the school's submission. Educational Technical College stated, however, that the school transitioned the Information Systems and Computer Repair Technician (Diploma) program to the Lares location where the school will begin enrolling students. The Commission is interested in monitoring contemporaneous retention information to assess the school's progress with retaining students at the Lares location. Therefore, the Commission requests further retention data as part of the response to this letter.

Furthermore, for each program which the reported rates of licensure exam passage do not meet the ACCSC benchmark of 70%, the Commission directed the school to provide an updated assessment of the factors impacting the rates of licensure exam passage. In response, Educational Technical College stated the following:

Each licensing board has different requirements, but please note that graduates can obtain employment under provisional licenses for a period up to 18 months to two (2) years without the need to sit for a licensing exam. Thus, when ACCSC asks for licensing test results, Edutec cannot provide this information because it takes graduates an inordinate amount of time before they have to sit for the professional license exam, if at all, based on the area of occupations chosen by the student.

Educational Technical College provided an analysis of the factors contributing to below licensure exam rates for Cosmetology, Electricity, and Practical Nursing particularly summarizing the cost of each exam and the provisional licensure processes and opportunities for students. Educational Technical College also described the issues regarding the licensing board processes and regulations. Regarding the Cosmetology program, the school stated:

While the law requires people who work in this industry to have licenses, the reality is that people do this work through an underground economy or working under someone else's license. Neither the government nor the licensing board has personnel to go around inspecting the different business to ensure compliance with the law. Thus, this law is not enforceable and we do have graduates working in these work situations, which tend to be the norm.

Educational Technical College also provided supporting documentation for graduates reported as employed in the field that included the dates that students completed provisional licenses, professional licenses, and the license status for each student. In summary, Educational Technical College reported the following:

Program (Credential)	Number of graduates	Number of graduates who completed and passed exam	Number of graduates who received a provisional license
Practical Nursing (Diploma) (San Sebastian)	17	1	12
Basic Cosmetology (Diploma) (San Sebastian)	8	0	0
Basic Cosmetology (Diploma) (Lares)	10	0	0
Electricity (Diploma) (Lares)	3	1	3

Educational Technical College provided the strategies that the school continues to implement to support graduates through the licensure process. Educational Technical College stated that the school continues to assist graduates with securing documentation needed to apply for provisional licenses as well as taking the licensing exams. Educational Technical College stated that the school provides graduates with free refresher classes to prepare graduates to take the professional license exam. Specifically regarding graduates from the Electricity program, the school stated that students can begin working as apprentices with a provisional license, and it could be upwards of two (2) years before they can get their professional licenses. In addition, regarding the Practical Nursing program graduates can apply up to four (4) times for a provisional license as long as they are in the process of sitting for the licensing exam, which enables graduates to work in the field for an extended period without the need to take the licensing exam.

In wake of the significant challenges faced by ACCSC-accredited institutions in Puerto Rico, the Commission recently voted to provide relief by waiving ACCSC's licensure requirement under *Section VII (B)(1)(b)(iii), Substantive Standards, Standards of Accreditation* for schools located in Puerto Rico for 2019; and in cases where licensure/certification would normally be considered required for employment, to not require such licensure in order for a graduate to be counted and classified as employed in the field provided that the school can otherwise show that the graduate is in fact working in the field of study in accordance with ACCSC's [Guidelines for Employment Classification](#). The Commission reminds Educational Technical College that while the licensure requirements are waived for 2019, the school should still gather data and report on all graduates that do take the licensure examination, and to continue to encourage graduates to seek to obtain licensure as required by the licensing entity.

While the Commission considered the school's history of reporting below-benchmark graduation and employment rates as outlined above, the Commission believes that it is important to provide ACCSC-accredited institutions in Puerto Rico with an opportunity to recuperate and rebuild following the devastation of Hurricane Maria. Additionally, the Commission acknowledged that Educational Technical College relocated to the Lares location in August 2018 and therefore the Commission is interested in ensuring that the school demonstrates the expected positive outcomes, including an increase in graduation and employment rates at the Lares location. Based on the August 2018 relocation date and the length of the programs offered at the school (e.g. 12 months and 13 months), the Commission expects that the school will have reportable data for students at the Lares location and for all programs as of October 2019. The Commission, therefore, determined that additional monitoring is warranted in order to provide the school with an opportunity to demonstrate the effectiveness of its efforts, demonstrate student achievement outcomes that meet accrediting standards, and to demonstrate improvements in student achievement rates and retention specifically for students at the Lares location.

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

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

Systems and Computer Repair Technician and Electricity programs using a **September 2019 Report Date**;

- c. Graduation and Employment Charts for the Information Processing Specialist with Medical Billing, Practical Nursing, Basic Cosmetology, Child Care and Development Assistant, Information Systems and Computer Repair Technician, and Electricity programs using a **September 2019 Report Date**;
 - d. An explanation regarding the quality and ongoing viability of **each** program relative to the Lares location, in light of the reported student achievement outcomes and an ACCSC Programmatic Teach-Out Plan Approval Form for any program the school has determined to discontinue and/or a timeline for phasing any such programs out;
 - e. Any additional information that the school believes will be useful to demonstrate the school's compliance with student achievement outcomes requirements.
2. Educational Technical College did not demonstrate that the school applies a fair and equitable refund policy in accordance with the school's established policy and that the policy is in compliance with all applicable regulations (*Section I (D)(5), Substantive Standards, Standards of Accreditation & Section I (B)(1)(e)(iii), Rules of Process and Procedure, Standards of Accreditation*). In response to the September 6, 2018 letter, Educational Technical College revised the school's attendance policy to include the consequences for students who are absent for 14 consecutive days without notifying the school. Educational Technical College also revised the attendance policy by removing the language that states the school allows students to be absent for 30 days before the student is withdrawn. Furthermore, in response, Educational Technical College provided a Refund Report Summary Sheet for students that were either dismissed or withdrew between January 1, 2018 and May 31, 2018. From the summary sheet, the Commission noted one late refund (student initials [REDACTED]), for whom the school issued a refund 30 days after the date of determination. Educational Technical College stated that the late refund was an oversight by school staff and therefore the school provided additional Title IV training to staff to ensure that late refunds are avoided in the future. The school's response notwithstanding, the Commission is interested in the ongoing effectiveness of the school's new processes and staff training with regard to processing student refunds.

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

- a. For students that were either dismissed or withdrew between April 1, 2019 and June 30, 2019, provide the following:
 - i. The Refund Report Summary Sheet;
 - ii. Refund Report Worksheets;
 - iii. Individual attendance records to include documentation of approved leave of absences, if applicable; and
 - iv. Copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds and
- b. An explanation regarding the factors contributing to any late refunds issued by the school during this time period and the corrective action taken by the school, if applicable.

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.

Response Requirements:

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

Educational Technical College must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.² If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

Educational Technical College must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for 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 September 10, 2019**. If a response, the required fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before September 10, 2019**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

² ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

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

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Encls.: Refund Report Worksheet
Refund Report Summary Sheet

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.