At the August 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place Western Truck School (“WTS”) located in West Sacramento, California on Warning and to refer the matter to the on-site evaluation conducted for the Applications for Renewal of Accreditation and Change of Location. Upon review of the April 23, 2019 Team Summary Report and the school’s response, the Commission voted to Continue WTS on Warning, with a subsequent review scheduled for ACCSC’s February 2020 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

- At the May 2015 meeting, the Commission granted WTS renewal of accreditation with reporting for four (4) years going forward from November 2014. The Commission determined that the school must submit a Financial Report demonstrating the financial structure of the school is in an ongoing manner sound with resources sufficient for the proper operation of the school and discharge of obligations to students.

- At the May 2016 meeting the Commission considered an Application for a Change of Location Part I. WTS moved its location without obtaining Commission approval prior to the move. In approving the application the Commission reminded WTS that the school must submit an application prior to the intended move date and assessed a late fee to the school.

- At the February 2017 meeting, the Commission determined that WTS met the requirements for a change of location and the addition of a satellite location (SL#460498). The Commission included an Institutional Enhancement Enclosure directing WTS continued attention toward ensuring that the school applies a fair and equitable refund policy, ensuring that personnel whose primary responsibilities include admissions activities are not permitted to be involved in admissions decisions, and ensuring that administrative and operational policies are consistently applied.

- At the August 2017 meeting the Commission considered the Application for a Change of Location-Part I & Part II submitted by WTS for its satellite location (SL#460498) as well as information that the satellite location changed location without prior notification or approval from the Commission. Upon review of the school’s application, the Commission considered the circumstances and approved the school’s application. The Commission included an Institutional Enhancement Enclosure directing WTS continued attention toward ensuring that the school monitors when appropriate applications and reports need to be filed and ensures that applications and reports submitted to the Commission are complete, accurate, signed by the school’s chief executive officer and filed in a timely manner.

- At the August 2018 Commission Meeting the Commission considered that on April 12, 2018 WTS again moved its location without prior application and approval. The Commission voted to place WTS on Warning and direct the on-site evaluation team scheduled to review the school’s Application for Renewal of Accreditation to evaluate the school’s on-going compliance with accrediting standards,
Western Truck School – West Sacramento, California

School #M072253
September 20, 2019
Page 2 of 14

Continued Warning

specifically as it relates to the school’s compliance with proper notification of substantive changes, as well as the new facilities and educational resources available for students.

August 2019 Commission Review

1. WTS must demonstrate the school has full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards and that owners, board members, members of school management, and administrative employees are qualified for their particular roles and who possess the appropriate education, training, and experience commensurate with the level of their responsibilities (Section 1 (A)(1)(a)&(b), Substantive Standards, Standards of Accreditation). The on-site evaluation team found that administrative staff files did not include a resume or job description demonstrating appropriate qualifications for current positions. The on-site evaluation team observed a general sense of unfamiliarity with accrediting standards.

In response the school provided documentation of qualifications for the Accounting Administrator and the Admissions & Career Services representative. The response does not include any information for...

The school’s response states,

Although the school has been through challenges in the recent past, it continues to strive for improvement in all aspects of its operations. In meeting its commitment to the student, its staff and the public at large, we understand that it is a continuous process. Nothing has provided greater clarity in that than accreditation. We recognize the importance of the monitoring activities through licensure, site visits, accreditation renewals, PAC, and the self-evaluation reporting. Hence, it was one of the decision points in continuing with accreditation as it can only make our school better than it was before.

Some of the more recent performance aspects, indicate that we again are in need of professional support, that we will need to continue to develop staff with defined roles, responsibilities and accountability and to improve communications overall and especially with students. To those ends, we have the following agenda-

• Seek a qualified consultant to assist with compliance and reporting matters and advise and support the operations within the context of accreditation standards (search has begun-Communications with Schulze Advisors out of Florida)

• Hiring of dedicated Placement Staff to reduce burdens on other staff and to enhance the accuracy of reported information and develop, adhere and monitor a system of follow up and documentation (completed)

• Continued emphasis on management planning and development of the communications of school organizational objectives (on-going and stress importance of defining goals and measuring outcomes-open and with staff acknowledgement and sign off)

• Commitment to staying within our strengths, which includes determination that advancement into Federal Funding (Title IV), is NOT a current or short term goal.

• Monthly Staff Development Activities -
  o Career Services- Employment Verification Policies- June 2019
  o Refunds and Processing Procedures- July 2019
  o Student Advisement Forms- August 2019
While the Commission considered the school’s efforts in this regard, the school’s response to the April 23, 2019 Warning Order raised concerns beyond the school’s failure to garner approval prior to changing location. As detailed below, the Commission has concerns and questions in several key compliance areas which has further caused the Commission to question whether the school’s management has the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards. Overall, it appears that the school had utilized consultants in the past and is now struggling to meet the burden of demonstrating compliance with accrediting standards without that external assistance. The Commission’s next assessment of the school’s ability to manage a post-secondary educational institution in compliance with accrediting standards will be based on the school’s response to the items of this Warning below. As a means to allow WTS to provide an update in this area, the Commission directs the school to submit the following:

a. An organizational chart including names and titles for all staff at the school;
b. Position descriptions and Staff Personnel Reports for all management-level staff;
c. An update on the initiatives described above;
d. Documentation of the completion of any and all development and training activities completed.

2. WTS must demonstrate that the institutional assessment and improvement planning activities (IAIP) are significant and ongoing experiences at the school and include goal setting, benchmarking and implementation activities appropriate to the size and scale of the school’s operations in the areas of management; fiscal condition and budget; administrative policies and practices; emergency preparedness; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes (Section I (B)(1)&(2), Substantive Standards, Standards of Accreditation). The on-site evaluation team found that the school’s planning document contained vague goals with no measurable benchmarks or actions on how the school intends on meeting desired outcomes. Although the document includes the year 2019, with no assessment dates or measurable benchmarks it was unclear to the team whether the school engaged in ongoing planning. In response to the TSR, WTS stated:

As a very small institution ... planning and assessment is a weekly routine at our meetings. ... it’s always a topic whenever we are together. Hence, those formalities of the documentation may be missing from the worksheet; however, they are far from absent or incomplete. Rather it is always top of mind and front and center during our management meetings and discussions.

Recent challenges in the school’s performance, staffing matters and the transitions to/from certain properties have taken a large part of management’s time and resources. Thus, emphasis had been on securing these aspects of the school.

We believe we are past many of those issues now and will turn our attention to more of the ongoing planning and assessments, and will be better equipped to handle added responsibilities for management and supervision activities, program improvements, instruction & faculty enhancements, career and placement support and overall attentiveness to students needs during and after training.
Additionally, we have a laser focus on the major overhaul aspects in the truck driver training industry, namely the Entry-Level Driver Training Standards (ELDTS) that are set to re-write the training requirements and school level requirements beginning in February 2020. These will necessitate a significant enhancement to the programs we currently have, in a very short time frame.

The school also submitted its “Updated and Condensed IAIP Document… to reflect our current planning and assessments to date.” The Commission noted that the IAIP document does not appear to sufficiently address all areas required by accrediting standards. Specifically the plan does not sufficiently address goals and assessments in the areas of faculty and staff development; administrative policies and practices; or student achievement outcomes. In addition, the response does not appear to include documentation of implementation of the plan.

Accordingly the Commission directs WTS to submit the following:

a. The school’s updated IAIP document(s) demonstrating planning and assessment in all areas required;

b. Documentation of the assessment and planning activities such as minutes from the above-mentioned meetings, as applicable, to demonstrate the facets of the plan that have been completed;

c. Any additional documentation, as applicable, to demonstrate implementation of the plan; 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. WTS must provide the results of an independent third-party audit to verify the school’s most recently reported employment data, in accordance with the instructions provided in the Application for Renewal of Accreditation and Self-Evaluation Report (Section VI (C)(2), Substantive Standards, Standards of Accreditation). The on-site evaluation team found the following:

- WTS provided an independent third-party audit from Collegiate Admissions and Retention Solutions, LLC (“CARS”) identifying 33 graduates of the Class A Commercial Driver (Diploma) program. School personnel and the CARS report indicated that the 33 students represent 100% of the “available to sample” population, however in review of the supporting documentation the list of students does not align with the Annual Report as last submitted to the Commission, or that of the previous two Annual Reports (2016 and 2017).

- Furthermore, a written statement from the school regarding the third-party verification of employment data states:

  As of June 25th, 2018 we have contracted with the Collegiate Admissions and Retention Solutions, LLC to conduct the third party employment verification of our student population for calendar year 2016...The total population is only 63 students for the Class A Commercial Driving Program (160 clock hours). The Class A Advanced Commercial Driving program was approved in April 2017, and had no students to report.

- Therefore, it appears that the school presented employment records for the 2016 calendar year, rather than from the Graduation and Employment Chart submitted with the most recent Annual Report and appears to have submitted for verification only a portion of the total sample size of 63 records. As a result, the third-party verification process does not comply with the ACCSC’S requirements.
WTS’ response to the TSR reveals a further lack of understanding of ACCSC rules, procedures, and requirements. The school’s response begins by stating,

...initially the school had strongly considered a voluntary withdrawal of accreditation...subsequent to the decision to move forward with the renewal, the school immediately engaged the independent third-party to perform the verification of the placement records. At that time, the 2018 annual reports had not been completed thus the determination was made, in conjunction with the third-party auditor, to perform the validation of the 2016 Graduation and Employment Chart commensurate with the SER.... Unfortunately, the file contained possibly a draft version of the G&E chart, which then was used inadvertently in the student sample for the auditor. The confirmation that it matched the report as filed with the commission was overlooked as the party responsible for those filings was no longer part of the company.

For clarification, on that G&E chart, the school had completed a total of 63 graduates for the Class A Commercial Driver Program (160 clock hours). Of those total graduates, 33 had been identified as employed in the industry per the school’s records. Those were the 33 students submitted to the independent third-party auditor for verification purposes. It was understood that the verification related to employed/placed graduates and not the entire population. Again, the school understands the issue and was making the best efforts to comply in the matter. Therefore at the time, consideration was made to make best efforts to comply with ACCSC’s requirements for third-party verification and to have those results available as soon as possible by utilizing the data that was readily available at the time.

To accompany the above narrative WTS submitted a Graduation and Employment (“G&E”) Chart dated October 2017, highlighting the following in yellow: “Number of Students Available for Graduation” (63) and “Graduates Employed in Field” (33), apparently to support the school’s above narrative explanation.

The Commission noted the following regarding the school’s above narrative and supporting G&E Chart:

- It is unclear why, if the 2018 Annual Report had not been completed that the school chose to verify the 2016 Annual Report and not the more recent, 2017 Annual Report.
- The 2017 and 2016 Annual Reports have a July Report Date, not October.
- The 2017 Annual Report, with a July 2017 Report Date, reports 42 Graduates-Employed in the Field (“EIF”). The 2016 Annual Report, with a July 2016 Report Date, reports 51 as EIF in the 1-month Class A Commercial Driver and 11 in the 2-month version for a total of 62 EIF.
  - If the school was seeking to verify the 2017 Annual Report, the total Employed in Field (available to sample) would be 42.\(^1\) If WTS was seeking to verify the 2016 Annual Report then the school should have sent the 62 employed graduates to the third-party for verification (it would be up to the school to have all 62 verified or 50% of each chart).
  - Either way, there is no Annual Report with 33 total employed graduates on a chart or a combination of any charts. Furthermore, the submission of an October 2017 G&E Chart with 33 Graduates Employed in Field to support a narrative regarding the 2016 Annual Report reveals further lack of understanding of the process.

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\(^1\) In the 2018 Annual Report the school reported a total of 18 Graduates Employed in the Field.
The October 2017 G&E Chart highlighted by the school does not show “a total of 63 graduates.” Instead, it shows 63 available for graduation and 50 total graduates of which 33 are employed.

Based on the foregoing the Commission directs WTS to submit the results of an Independent Third-Party Verification of the school’s reported rates of employment from the 2019 Annual Report in accordance with the ACCSC Guidelines for Independent Third-Party Employment Verification.

The Commission recommends that the school review the ACCSC Blueprints for Success Series: Module IV: The Graduation and Employment Chart, which provides fundamentals on completing the G&E Chart.

4. WTS must demonstrate that the school supports reported rates of student graduation and graduate employment through student transcripts, the school’s verifiable records of initial employment of its graduates, or other verifiable documentation (Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation and Appendix VII Guidelines for Employment Classification) as follows.

**Documentation to Support Graduation and Employment Charts**

a. The on-site evaluation team found that WTS did not provide documentation to support the data reported on the Graduation and Employment Chart, specifically the school was unable to provide a list of students showing program, start date, and date of graduation or date of withdrawal/termination. The school’s recordkeeping system appears to be very antiquated and the records are primarily kept with a focus on date of graduation or termination, rather than start date.

b. The on-site evaluation team found that WTS did not demonstrate that the school supports student achievement rates through verifiable records of initial employment of its graduates. The school provided records of initial employment for the 33 students submitted to CARS for verification. The on-site evaluation team found the records consisted of a copy of handwritten notes regarding placement of 8 graduates by school personnel. To further support said list of 8, there were two Driver IQ forms, two incomplete employment verification forms and one pay slip for a single day’s work.

The response to the TSR indicates that records should have been better organized and formatted for the team to inspect and that “[w]hile the third-party verification did identify a few students who were unable to be confirmed, the data had been obtained through direct communication with the students via the school prior to the conclusion that the student had been placed.” The Commission reminds WTS that the school must document and verify reported placements in accordance with Appendix VII Guidelines for Employment Classification in addition to and prior to third-party verification.

Lastly the response indicates that WTS has hired a student services staff person whose only responsibility will be to address student placement and will enhance the school’s ability to accurately document employment and maintain placement information within the student information system. The response however does not include any other information about the employee or the implementation of new procedures.

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2 The Commission acknowledges that the response to this letter is due two months after the due date of the 2019 Annual Report; however given the small student population and that the school can start the project prior to the October Annual Report deadline the Commission determined that this directive is reasonable.
The response refers to attachments named “Graduation & Employment Charts 2017 & 2018 Days/Nights & Weekends,” however, the school only submitted October 2017 G&E Charts in the response. The Commission therefore reviewed the G&E Charts submitted in the 2018 Annual Report, using a July 2018 Report Date and noted that for the 1-month Class A Commercial Driver program the school reported an 80% graduation rate which meets benchmark and a 64% employment rate which falls below benchmark.

**Annual Report G&E Chart Requirements**

The on-site evaluation team also found that WTS did not demonstrate that the school provides Annual Report information in accordance with the prescribed requirements and instructions that accompany the ACCSC Graduation and Employment Chart (Section VII(B)(1)(b)(ii), Substantive Standards, Standards of Accreditation). The school submitted one graduation and employment chart for the class A Commercial Driver program with the length of 1 month. However, the school offers three different class schedules resulting in varying program lengths: day (4 weeks), evening (6 weeks), and weekend (8 weeks). In accordance with the instructions to the Graduation and Employment Chart, the school must complete two separate charts, one for the 4-week (1 month) program and a second for the 6-week and 8-week (2 month) programs.

In response WTS stated the following:

> During the site visitation, the school was apprised of the necessity to break out the Class A Commercial Driver Program- four-week course versus the six and eight week courses. This had been done in earlier years where the company had consultants on- site assisting with these activities. Unfortunately after the transition, the results of the program were all consolidated into a single report. It is noted and will be made certain in future reports that the four-week program will be segregated from the six and eight week programs for the annual reporting. Additionally, the school has completed preparation of the reports to properly show each of the programs and their respective results.

The response does not include any documentation of properly prepared reports. Therefore, the Commission will direct the submission of further information to document the school’s compliance as part of this item’s response requirements below.

**Third Party Employment Verification Results**

Given that the independent third party auditor could not verify or verified as different 27% (9 of 33) of the employment records audited, the school was required to provide additional information to demonstrate the validity of the school’s records, reported programmatic employment rates, and compliance with accrediting standards including a list of those 9 graduates; the documentation that the school relied upon to classify each of those graduates as “Employed in Field;” and a justification as to why so many records were unable to be verified and how the reported data can be considered “reliable.”

The school stated that it is working to improve placement documentation and has hired a dedicated staff member to work solely on placement. The Commission noted that the school’s response only includes documentation for 3 graduates and the narrative explanation appears to in many cases describe verbal verification which is only permitted after showing diligent effort to obtain written documentation pursuant to Appendix VII Guidelines for Employment Classification.

Based on the foregoing the Commission determined that WTS must submit information to demonstrate an understanding of the Commission’s student achievement reporting and documentation requirements.
Therefore, in addition to the above third-party verification required in item #3 above, the Commission also directs WTS to submit the following:

a. A copy of the school’s process and procedures for recording and verifying graduate employment;

b. A copy of the current verification form or other tools the school is currently utilizing to verify employment as part of the above process and procedures;

c. The name, qualifications/training, and job description for the new career services staff person hired by the school;

d. A Graduation and Employment Chart for all program lengths/versions of all programs offered at the school using a July 2019 Report Date as reported in the 2019 Annual Report.

e. If the reported rates of student graduation or graduate employment do not meet the ACCSC benchmark, a description of the strategies being implemented to support student graduation or employment and an assessment of the school’s progress toward meeting the Commission’s benchmarks.

f. Summary information for the 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:

<table>
<thead>
<tr>
<th>Count</th>
<th>Student ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Withdrawal/Termination Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>12345</td>
<td>Cosmetology</td>
<td>01/10/17</td>
<td>06/01/2018</td>
<td>N/A</td>
</tr>
<tr>
<td>2</td>
<td>12346</td>
<td>Cosmetology</td>
<td>01/10/17</td>
<td>N/A</td>
<td>01/10/2018</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Count</th>
<th>Student ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Reason Unavailable</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

iii. For each graduate classified as employed in the field\(^3\) (line #14), provide the following information:

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Employer Name, Address, &amp; Ph. #</th>
<th>Employer Point of Contact</th>
<th>Date of Initial Employment</th>
<th>Descriptive Job Title and Responsibilities</th>
<th>Source of Verification(^4) (i.e., graduate or employer)</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

iv. Supporting and verifiable documentation for each graduate in (iii.) above including a copy of the completed verification form or other tools the school is currently utilizing to verify employment;

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

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

vi. Supporting and verifiable written documentation for each graduate in (iii.) above to include a signed statement from the graduate with the graduate’s name and contact information; and

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\(^3\) See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

\(^4\) Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.
vii. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Classification on the G&amp;E Chart</th>
<th>Reason</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

g. 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.

h. Considering that the school is implementing new procedures and has hired a new placement staff person, as a means to provide the school an opportunity to provide more recent documentation for graduates that do not fall within the reporting period of the G&E Charts above the Commission directs WTS to submit the following.

i. For each graduate who gained employment between September 1, 2019 thru November 30, 2019 provide the following information:

<table>
<thead>
<tr>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Grad. Date</th>
<th>Employer, Contact, Address, &amp; Phone#</th>
<th>Date of Initial Employ.</th>
<th>Descriptive Job Title</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

and

ii. The following supplementary information:

- A copy of the school’s completed verification form (as indicated above) for each graduate employed listed in (h)(i) above;

- For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:
  - The graduate’s name and contact information;
  - An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
  - An attestation that the graduate is earning training-related income; and
  - In cases where licensure is required for employment, an attestation that such licensure has been achieved; and

- 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 provided 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.

5. WTS must demonstrate that the school remains attentive to student needs (Section VI, (A)(1), Substantive Standards, Standards of Accreditation). Results from the student survey conducted during the on-site evaluation indicate that 33% (2 of 6) would not recommend the school to a friend. In response to the TSR, WTS stated that the school has instituted a weekly assessment program where the admissions representative along with the instruction staff meet to review an individual student’s progress which has helped provide information about the student’s progress and ways the school can improve and be attentive to student needs. “It is however a constant process that may have navigated off track when the weekly assessments were not consistently presented openly with each student. We have seen improvement in both staff interaction, acknowledgement of issues and student participation in their progress.” The Commission found that the response does not include any updated surveys. Therefore, the Commission directs the school to submit the following:

a. Summary results of a student survey of not less than 50% of the student population enrolled at WST using either the ACCSC student survey or one that is substantially similar that includes questions regarding student satisfaction with the school’s facilities, equipment, and learning resources system as well as the following:

b. A description of the student survey process and a copy of the survey instrument used;

c. A detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction;

d. A detailed narrative of the school’s plan to address any areas of student satisfaction, if applicable, and any other information to support the efforts made to enhance a student’s experience at the school; and

e. Any other information or documentation that WST believes will assist the Commission with determining the school’s compliance with accrediting standards in this regard.

6. WTS must demonstrate that the school conducts at least two meetings of the Program Advisory Committee (“PAC”) annually (Section II (A)(6)(d), Substantive Standards, Standards of Accreditation). The on-site evaluation team found that the school provided documentation demonstrating only one PAC meeting occurred in both 2015 and 2017. In response to the TSR, the school stated that,

WTS is aware that two years in question did not have the requisite number of PAC meetings.
We have complied with the requirements for (2) meetings annually in 2014, 2016 and 2018.
Additionally, we have had one PAC meeting in 2019 [the response indicates this meeting was held on March 20, 2019] and are planning our second for September 2019...

The response does not include a copy of the March 20, 2019 meeting minutes and the Commission is also interested in ensuring that the school holds the second meeting in September 2019 as planned. Therefore, the Commission directs WTS to submit a report of all PAC meetings held for all programs in 2019 (i.e., the March and September 2019 meetings). The school must submit detailed minutes of each meeting clearly organized by program or program area and each set of minutes must include the following:

a. A description of each member in attendance (i.e., titles and affiliations) and a notation as to which members in attendance represent the employment community or are practitioners;
b. The date, time, and location of each meeting;

c. A comprehensive and clear description of the review of and commentary made by the PAC members; and

d. Evidence the school gives consideration to PAC input.

7. WTS must demonstrate that all monies paid by an applicant are refunded if requested within three days after signing an enrollment agreement and making an initial payment (Section I (D)(4)(b), Substantive Standards, Standards of Accreditation). The on-site evaluation team found that the cancellation policy published in WTS’ catalog states “you have the right to cancel your agreement for a program of instruction, without penalty or obligations, through attendance at the first class of session or the seventh day after enrollment, whichever is later, and receive a full refund less the non-refundable registration assessment.” Furthermore, the registration fee is listed in the enrollment agreement as non-refundable multiple times, including the statement “this refund will be less a registration or administration assessment not to exceed $250.00” and “non-refundable registration assessment when calculating refunds.” In response to the TSR, the school stated that “[a] California school we are governed by the private postsecondary and higher education institutions act,” and provided an excerpt of the legislation which indicates:

Institution shall refund 100% of the amount paid for the institutional charges less a reasonable deposit or application fee not to exceed $250, if notice of cancellation is made through attendance at the first class session or the seventh day after and more enrollment whichever is later.

The Commission reminds WTS of Section I (D)(3) Rules of Process and Procedure, Standards of Accreditation which states that in cases where accrediting standards and federal or state government requirements differ, the more stringent will apply. In this case, ACCSC’s more stringent requirements apply. Considering that the above state legislation indicates “not to exceed $250,” the response does not demonstrate that by complying with ACCSC’s Standards the school will be out of compliance with state regulations. Therefore, the Commission directs WTS to submit an updated catalog with a revised cancellation policy that complies with ACCSC accrediting standards.

8. WTS must demonstrate that the published catalog accurately portrays the school and at a minimum includes all items listed on the ACCSC Catalog Checklist (Section IV (C)(1)(a), Substantive Standards, Standards of Accreditation) and that all programs offered by a school that fall within the Commission’s scope are approved by the Commission as within the school’s scope of institutional accreditation (Section I (B)(2)(a) Rules of Process and Procedure, Standards of Accreditation). The on-site evaluation found that the school’s catalog includes two 180-clock hour programs, which school personnel stated are not offered: Class A Commercial Driver Extended and Class A/P Combined Commercial Driver Program. WTS provided documentation during the on-site evaluation showing the last enrollment and graduate for the Class A/P Combined Commercial Driver program was in 2016, and verbally stated the Class A Commercial Driver Extended program has never had enrollments. In addition, these programs are not approved by ACCSC.

The response appears to indicate that the school may be offering programs as unapproved “avocational” programs when in fact they may be vocational and therefore are required to be approved under ACCSC’s scope. Specifically, the school stated the following,

The institution went through its renewal of accreditation in November 2014. During the on-site visit, it was noted that several of the programs in the catalog were not approved by ACCSC. Immediately, the school suspended all programs except the approved Class A Commercial
Driver Program (160 clock hours), to comply with the findings at that time. Under the direction of our consultant at the time, we continued to suspend those programs; Not only do we believe that was incorrect (as we were later authorized to use many of the programs since they were considered avocational) it also had a direct impact on the financial stability of the school operations. Then sometime later during 2016, a second consultant was hired to perform a rewrite and update our program curriculum for the approved Class A Commercial Driver Program and to work on an expanded program called the Class A Advanced Commercial Driver Program. During this time, it was subsequently discovered that we could actually be operating some of the programs in the catalog since they were avocational in nature. Hence, the company resumed those programs under the direction of second consultant who is well known with ACCSC staff. He had also received confirmation of the authorization of those programs with ACCSC staff. Along the same line of analysis, a PAC meeting discussion developed around the opportunity to expand training hours to allow students to simply continue to practice and enhance the skills under the approved Class A Commercial Driver Program. That program was developed as the Class A Commercial Extended Driver Program which simply added 20 hours of continuing skills-based training onto the applicable curriculum of the 160 clock hour program.

Additionally, the Class A/P Combined Commercial Driver Program was simply the addition of a passenger endorsement to the approved 160 clock hour program with the understanding these programs simply refined the existing program that was approved. Upon inspection of the accreditation standards that result in less than a 25% change in the program’s clock hours or changes to the name and of approved program is considered to be non-substantive. It appears that the school should have prepared a program modification report for these changes i.e. less than 25% change in program hours (180 vs. 160 clock hours). At that time, we were in reliance on two independent consultants to assist in all compliance matters relating to our operating approval at the state level and meeting accreditation standards and compliance.

The response is not clear as to in which programs the school is actually currently enrolling students. That notwithstanding, the statement “the Class A Commercial Extended Driver Program which simply added 20 hours of continuing skills-based training onto the applicable curriculum of the 160 clock hour program” does not make clear that this program/course is avocational. Schools may offer avocational courses without approval from ACCSC; however this 180 hour program sounds like the full vocational program with added coursework. If the school wishes to offer “Continuing skills-based training,” then those courses should be listed as unapproved avocational courses in the catalog separately from the 160-hour ACCSC-approved program.

For the Class A/P Combined Commercial Driver Program which is “simply the addition of a passenger endorsement to the approved 160 clock hour program with the understanding these programs simply refined the existing program that was approved,” the school to date has not submitted a nonsubstantive program modification.

Based on the foregoing the Commission directs WTS to submit the following:

a. For the 180-hour Class A Commercial Extended Driver Program, the school must submit one of the following:
   i. An explanation and demonstration as to how the program is avocational in nature (i.e., does not prepare the student for employment and is only continuing education);
i. Documentation demonstrating that the school has broken out the 20 hours of continuing skills-based training as an individual course(s); that the catalog makes clear these courses are not under ACCSC’s scope of approval; and that the 180-hour *Class A Commercial Extended Driver Program* has been removed from the catalog; or

iii. A nonsubstantive program modification changing the 160-hour program to 180-hour or an Application for a New Nondegree Program for the 180-hour *Class A Commercial Extended Driver Program*; and

b. For the Class A/P Combined Commercial Driver Program the school must submit a non-substantive program modification.

9. WTS must demonstrate that the school discloses the graduation and graduate employment rate for each program as last reported to the Commission that includes the program population base and time frame upon which each rate is based (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that WTS has no system for disclosing the graduate and employment rates as last reported to the Commission. In response to the TSR, WTS stated “[s]ee Attachments Graduation & Employment Charts 2017 & 2018 Days/Nights & Weekends.” The attachments submitted are G&E Charts dated October 2017, which a) are not the rates last reported to the Commission and b) G&E Charts are not disclosures. Therefore, WTS has yet to demonstrate that the school has a system for disclosing the graduate and employment rates as last reported to the Commission. The Commission directs WTS to submit the following:

a. A narrative description of the school’s system for disclosing the graduate and employment rates as last reported to the Commission and

b. A copy of the school’s current disclosures of the graduation and graduate employment rate for each program as last reported to the Commission that includes the program population base and time frame upon which each rate is based – for example, screenshots/hyperlinks to the school’s website showing the disclosures or disclosure sheets provided to students prior to enrollment, etc.

**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.
WTS 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. 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.

WTS 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 December 3, 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 December 3, 2019, the Commission will consider further appropriate action.

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

For further assistance or additional information, please contact [redacted] or [redacted].

Sincerely,

Michale S. McComis, Ed.D.
Executive Director

Encl: ACCSC Student Survey

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

6 ACCSC assesses a $500 processing fee to a school placed on Warning.
**STUDENT SURVEY**

**Current Program:**

**Start Date:** (month/year you started training)

Please check the box that best reflects your opinion and experience at this school.

### ADMISSIONS

<table>
<thead>
<tr>
<th>Number</th>
<th>Statement</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.</td>
<td>A school representative accurately provided me with all of the necessary facts and details about the school before I enrolled.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td>All tuition costs and student charges (such as books, fees, tools, etc.) were explained to me.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td>I was able to make an informed decision to enroll based on the information provided to me during the admissions process.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td>My decision to enroll was solely my own and made without pressure from the school.</td>
<td></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>5.</td>
<td>Did you receive a copy of the school catalog (a hard copy or electronic document that describes the school, its programs, policies and procedures) before you enrolled?</td>
<td>Yes:</td>
<td>No:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>6.</td>
<td>Did you receive a copy of the enrollment agreement that was signed by you and a school official?</td>
<td>Yes:</td>
<td>No:</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### FINANCIAL AID

<table>
<thead>
<tr>
<th>Number</th>
<th>Statement</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>7.</td>
<td>The financial aid representative provided me with accurate information that helped me make an informed decision regarding the affordability of school.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>8.</td>
<td>I was able to make an informed decision about the affordability of school without persuasion from the financial aid representative.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>9.</td>
<td>(If you have a student loan): The school explained the amount of my loan.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>10.</td>
<td>(If you have student loan): The school explained my loan repayment responsibilities (e.g. frequency of payment and amount per payment).</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### ACADEMIC PROGRESS

<table>
<thead>
<tr>
<th>Number</th>
<th>Statement</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>11.</td>
<td>The school’s grading policy is explained clearly.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>12.</td>
<td>The school’s grading policy is applied fairly.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>13.</td>
<td>The school’s attendance policy is explained clearly.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>14.</td>
<td>The school follows its published attendance policy.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>15.</td>
<td>The school reports my academic progress (grades and attendance) to me at regular intervals.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### STUDENT SERVICES

<table>
<thead>
<tr>
<th>Number</th>
<th>Statement</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>16.</td>
<td>The school made me aware of services (academic advising and tutoring) that are available to assist me when I have questions about my educational training.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>17.</td>
<td>The school made me aware of services that can assist me if I have issues that affect my ability to attend school and complete the program.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>18.</td>
<td>The school made me aware of services that it provides to help me get a job after I graduate.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>19.</td>
<td>The school follows its published procedure for handling student concerns/complaints.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### FACULTY

<table>
<thead>
<tr>
<th>Number</th>
<th>Statement</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>20.</td>
<td>Instructors are interested in my individual progress throughout the program.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>21.</td>
<td>Instructors seem knowledgeable about subject areas they are teaching.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>22.</td>
<td>Instructors appear to be trained to teach.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>23.</td>
<td>Instructors answer questions in an understandable way.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>24.</td>
<td>Instructors have a positive attitude and treat all students fairly.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>25.</td>
<td>Instructors make class interesting.</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**PLEASE COMPLETE BOTH SIDES OF THIS SURVEY**

Revised 08/2015
<table>
<thead>
<tr>
<th>LIBRARY/LEARNING RESOURCE SYSTEM (LRS)</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>26. The school provided an adequate orientation on how to use the library/LRS.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>27. The library/LRS is staffed and someone is available to help me when I have questions.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>28. The library/LRS is useful for completing required assignments.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>29. The library/LRS materials are available during and beyond classroom hours.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>FACILITY</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>30. The physical facilities (overall building) are adequately maintained.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>31. The classrooms are adequately maintained.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>32. The laboratories are adequately maintained.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>TRAINING EQUIPMENT</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>33. There is sufficient time for hands-on training and practicing on the equipment.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>34. The training equipment is sufficient in quantity.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>35. The training equipment is sufficiently up-to-date and kept in good repair.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OVERALL EDUCATIONAL EXPERIENCE</th>
<th>Strongly Agree</th>
<th>Agree</th>
<th>Disagree</th>
<th>Strongly Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>36. I feel good about my decision to attend this school.</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>37. I would recommend this school to a friend (assuming my friend was interested in this type of training).</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
</tbody>
</table>

38. What do you expect to do when you complete your training program? (You may choose more than one answer)

- [ ] Go to work in an occupation for which my training has prepared me.
- [ ] Continue my education in this same occupational area.
- [ ] Seek employment in an occupation not related to this training program.
- [ ] Continue my education in an occupational area different from this training program.
- [ ] Other:

**COMMENTS (OPTIONAL)**

Please use this space to elaborate on any of your answers to the survey questions, include suggestions to improve the school, or provide any additional comments/concerns about your overall experience at the institution.

___________________________________________________________________________________________________________
___________________________________________________________________________________________________________
___________________________________________________________________________________________________________
___________________________________________________________________________________________________________
___________________________________________________________________________________________________________

Thank you for completing this survey. Your comments will be very helpful.