



Accrediting Commission of Career Schools and Colleges

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September 6, 2017

ELERONIC DELIVERY

[REDACTED]
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Instituto de Educacion Tecnica Ocupacional La Reine
Avenida Colon #A-8
Manati, Puerto Rico 00674

School #M059629
Continued Warning

Dear [REDACTED]

At the August 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Instituto de Educacion Tecnica Ocupacional La Reine (“IETO-Manati”) located in Manati, Puerto Rico on Warning. Upon review of the June 7, 2017 Warning Order and the school’s response, the Commission voted to take the following actions:

- **Continue the Warning** for IETO-Manati with a subsequent review scheduled for ACCSC’s February 2018 meeting
- **Place a limit on enrollment** for the following programs:
 - Basic Cosmetology
 - Advanced Cosmetology
 - Barbering
 - Master Barbering; and
 - Plumbing

The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

1. IETO-Manati must demonstrate that the school’s current management team has the ability to manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). In the June 7, 2017 Continued Warning Order the Commission noted the school’s history of persistent inability to address compliance issues which raised questions about the management team’s ability to operate the school in compliance with accrediting standards on an ongoing basis. The Commission notified the school that the 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 in the June 7, 2017 Continued Warning Order. In response the school stated that it is committed to achieving compliance but that it will take time to fully implement new policies and procedures. Specifically, the school stated:

The institution has focus its efforts in the most aggressive and diligent way to deal with this concern providing resources and creating Policies and Procedures. All this efforts guided to mitigate and permanently resolve the deficiencias noted in order to be in compliance with all accreditation standards cited in the report. Note however that this are process that require time for implementation and also time to assess and evaluate performance and results. We have imporved as you will noticed in the adress of all remaining segments of this report. All areas of concern were attended. The institution created and implemented the necessary processes and actions needed to correct, imporve and implement the changes needed. Our school is committed and has implemented what we consider are the necessary changes for improvemnet and be in compliance. As with all

corrective action plans we need the reasonable opportunity to continue and assess the results of our changes to our imporvemnet process and expect that the commission understand our efforts and intereste in continue to be in compliance with the accrediting standards. Instituto de Educacion Tecnica Ocupacional La Reine is willing to continuously provide progress reports to the commission as needed to demonstrate not only improvement and compliance implemented but consistency and continuity in our administrative and academic performance [sic].

The Commission noted some progress in the school’s ability to respond and to acknowledge areas that are in need of remedy. The Commission will continue to assess the school’s ability to manage a post-secondary educational institution in compliance with accrediting standards in part based on the response to the items below. Continued failure to demonstrate compliance with accrediting standards will serve to exacerbate the Commission’s concerns.

- IETO-Manati must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provides education; demonstrate acceptable pass rates on licensure/certification exams where required by governmental entities to work in a particular career field; and demonstrate that the school supports student achievement rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VI (C)(2) and Section VII (B)(1)(b), Substantive Standards; and Appendix VII-Guidelines for Employment Classification, Standards of Accreditation*). IETO-Manati must demonstrate the reliability and verifiability of the school’s graduate student employment records. In order to be categorized as “Employed in Field” on the Graduation and Employment (“G&E”) Chart a graduate must be licensed to practice in their field where required by government entities.

Graduation, Employment, and Licensure

At issue is that IETO-Manati reported to ACCSC graduates as employed in the field who have not obtained licensure. Therefore, in the June 7, 2017 Continued Warning Order the Commission directed IETO-Manati to submit employment information that accurately reflects only students that have taken and passed the licensure exams for the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs. The Commission’s letter also notified the school that if the corrected reported rates for any program(s) do not meet ACCSC’s graduation and employment benchmark rates or if the school reports any graduate as employed in the field who has not taken and passed the licensure exam, the Commission will consider taking a programmatic action to require the school to cease enrollment in a program or suspend or revoke the approval of a program (*Section VII (R), Rules of Process and Procedures, Standards of Accreditation*) or taking an institutional action including Withdrawal of Accreditation (*Section VII (R), Rules of Process and Procedures, Standards of Accreditation*).

In its response using a May 2017 Report Date as directed, the school reported the following graduation and employment rates (below benchmark rates are bolded):

| Program | Length In Months | IETO-Manati Graduation Rate | ACCSC Benchmark Graduation Rate | IETO-Manati Employment Rate | ACCSC Benchmark Employment Rate |
|---------------------|------------------|-----------------------------|---------------------------------|-----------------------------|---------------------------------|
| Commercial Catering | 12 | 70% | 55% | 71% | 70% |
| Barbering* | 12 | 64% | 55% | 6% (2 out of 34) | |
| Master Barbering* | 12 | 80% | 55% | 0% (0 out of 4) | |

| | | | | |
|-----------------------|----|-----|-----|------------------|
| Cosmetology* | 14 | 55% | 50% | 0% (0 out of 23) |
| Advanced Cosmetology* | 10 | 57% | 55% | 25% (2 out of 8) |
| Nails Technician | 10 | 42% | 55% | 100% |
| Chef | 10 | 65% | 55% | 76% |
| Plumbing* | 12 | 73% | 55% | 25% (2 out of 8) |
| Child Care Assistant | 10 | 85 | 55% | 47% |

*Require licensure to work

In its response IETO-Manati provided an update on the school’s procedures for documenting and reporting licensure and employment rates to ACCSC; a copy of the revised policy; an updated assessment of the factors impacting student achievement rates; and strategies implemented by the school to remedy those factors.

Narrative:

...the school has contacted the company that administers the State Board Examination, Professional Credential Services (PCS), and they have agreed to provide upon written solicitation, a list of the students with the results of those that have taken the required State Board Exam.

The last Board Exam was offered in April, 2017. The school has applied for copies of the results of its students that took the exam on that date. To date no answer has been received from the administrator of said exams.

The school would continue to apply this new procedure with the next State Board Examination date which is scheduled for November 2017. The announcement for the November examination date has not been published yet.

Updated assessment of the factors impacting student achievement rates:

- *The ability to work without having a valid or required license:*
 - *The Commonwealth of Puerto Rico at present does not have the ability or has been unable to properly physicalize people or businesses that operate with the required licensure and / or permits. Especially people or businesses that are independently owned.*
- *The cost of board exam and requirements:*
 - *There is a required fee of \$160.00 plus upon passing the exam there are and additional cost to secure the actual license.*
- *Frequency of exam:*
 - *By law, State Board Exams are offered two time a year. Once in April and the second opportunity in November.*
- *Student’s unwillingness to take exam:*
 - *Although students are counselled of the requirement that they must take and pass a State Board Exam to be able to legally work in their field of study, upon completion, some just decide not to take the Exam or just prolong this final process.*

Strategies implemented by the school:

- *The College has implemented an institutional wide effort to remind student of need to take Board exam in order to secure legal employment on their field of study. [The school provided] copies of documents that evidences this orientation given to new and graduate students.*

- *The school offers to its graduates a free program review in preparation for the Board Exam. This review includes both Theory and Practice in the program of study...*
- *The school will also provide free transportation to and from the Examination sites.*

Upon review of the above the Commission noted the following:

- The school only reported graduates as employed in field that have taken and passed the licensure exam, as directed. However, the employment rates for the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs are now significantly below benchmark. At issue is the low percentage of students who take the exam which results in low employment rates. The school enrolled 42 Cosmetology students during the reporting period and not one of the 23 graduates took/passed the exam. The school enrolled 53 Barbering students during the reporting period and only 2 out of 34 graduates took/passed the exam.
- The new orientation certification signed by students “to remind them” of the need to take the Board exam is a step in the right direction but will most likely not be sufficient. The information provided does not make clear whether the certification is an admissions requirement that must be met prior to enrollment. The Commission is interested in ensuring that the school not only makes students aware of the licensure requirements but also that the school’s admissions criteria are designed to admit only those students who are reasonably capable of benefitting from the training (*Section V (A)(1) Substantive Standards, Standards of Accreditation*), which considering the circumstances appears to include at least a commitment to obtaining licensure.
- The response does not make clear whether the school is disclosing the exam fee prior to enrollment. Also, the response does not include any strategies to assist students in paying the \$160 exam fee (e.g., the school paying for part of the fee, asking the PCS to give a bulk discount, etc.).
- While the Commission appreciates that the school is offering free exam preparation services to graduates, it seems as though after graduation might be too late to reach those students. The response does not appear to mention any exam preparation services prior to graduation.
- The Commission is interested in input from internal (e.g., faculty) and external (e.g., industry professionals/Program Advisory Committee) sources regarding the school’s strategies to increase the number of graduates who take the exams.
- The response does not include any goals for increasing the number of graduates who take the exams for the current or recently graduated students. The Commission is interested in the results of the April 2017 exam and the exam scheduled for November 2017.

Based on the foregoing, the Commission determined that in order to be financially responsible to students and with federal funding, IETO-Manati may not continue to enroll an unlimited number of students until the school has effectively addressed this issue and graduates are consistently taking (and passing) the licensure exam and obtaining legal employment in their field of study. Therefore, effective as of the date of this letter the school **must cap enrollments at 20% below the current enrolled population for the following programs: Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing.** This means that as current students graduate, the school must limit enrollment not to exceed a population of 20% below the current population of that program. For example, if a program currently has 10 students enrolled, as those students graduate, the school may enroll students but may not exceed a total of 8 students in the program at any point in time.

The school must also submit the information that follows below. If the reported rates for any program(s) do not meet ACCSC's graduation and employment benchmark rates or if the school reports any graduate as employed in the field who has not taken and passed the licensure exam, the Commission will consider taking an additional programmatic action to require the school to cease enrollment in a program, suspend or revoke the approval of a program (*Section VII (R), Rules of Process and Procedures, Standards of Accreditation*), or taking an institutional action including withdrawal of accreditation (*Section VII (R), Rules of Process and Procedures, Standards of Accreditation*).

Employment Verification

In the June 7, 2017 Continued Warning Order the Commission directed IETO-Manati to submit an updated description of the school's process and procedures for recording and verifying graduate employment along with a copy of the current verification form or other tool the school is currently utilizing to verify employment to incorporate changes in the school's employment record keeping, reporting, and classification policies that address the required licensure requirements described above. The school's response includes the policy and a new verification form, however the school did not have any recent placements to report to show implementation of the new form. As such, the Commission is interested in further documentation to show systematic implementation of the school's process to demonstrate that the school maintains verifiable record of employment for its graduates.

Therefore, in order to provide the school an additional opportunity to demonstrate successful student achievement and demonstrate that the school supports student achievement rates through the school's verifiable records and documentation of initial employment of its graduates, the Commission directs IETO-Manati to submit the following:

- a. The number of students enrolled in the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs as of the date of this letter and evidence that the school is adhering to the Commission's limit on enrollments;
- b. A description of changes made in the school's admissions procedures as well as procedures for ensuring that graduates take the required licensure exam and a copy of those revised policies;
- c. A revised admissions disclosure regarding licensure [currently named Orientation Certification] which is worded in a way that not only informs the applicant of licensure requirements but also requires the applicant, prior to enrollment as a condition for acceptance to the school, to sign an attestation of commitment to taking/attempting the licensure exam after graduation;
- d. A list of all students enrolled in the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs for period September 15, 2017 through November 30, 2017 and a signed copy of the new admissions disclosure regarding licensure for each;
- e. A copy of the revised admissions policy from the school's catalog which includes the above admissions requirement;
- f. A copy of the program description as stated in the catalog for the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs which clearly shows the licensure requirement, exam fees, and any other information that a student needs to make an informed admission decision;
- g. The total number of graduates in the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs since January 2017 and the results of the April 2017 and November 2017 exams showing the number of graduates who took the exam, and the number

of graduates who passed the exam along with the school’s goals for the percentage of graduates that will attempt/take the next scheduled exam;

- h. Input from internal (e.g., faculty) and external (e.g., industry professionals/Program Advisory Committee) sources regarding the school’s strategies to increase the number of graduates who take the exams;
- i. A Graduation and Employment Chart for all programs, using a **December 2017 Report Date**. For the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs (IETO-Manati must submit employment information that accurately reflects only students that have taken and passed the licensure exams);
- j. An updated description of the school’s process and procedures for recording and verifying graduate employment along with a copy of the current verification form or other tool the school is currently utilizing to verify employment to incorporate changes in the school’s employment record keeping, reporting, and classification policies that address the required licensure requirements;
- k. Documentation of implementation of the school’s policy for verifying employment and new verification form to demonstrate that the school maintains verifiable record of employment for its graduates including the following:
 - i. For each graduate classified as Employed in the Field on each of the above G&E Charts for all programs submit the following information:

| Graduate Name or ID# | Program | Start Date | Place of Employment, Address, & Phone# | Employer Point of Contact | Date of Initial Employment | Passed Licensure Exam Y/N | Descriptive Job Title |
|----------------------|---------|------------|--|---------------------------|----------------------------|---------------------------|-----------------------|
| | | | | | | | |

- ii. For each graduate who gained employment in the career field for which the school provided education since June 7, 2017 submit the following information:

| Graduate Name or ID# | Program | Start Date | Place of Employment, Address, & Phone# | Employer Point of Contact | Date of Initial Employment | Passed Licensure Exam Y/N | Descriptive Job Title |
|----------------------|---------|------------|--|---------------------------|----------------------------|---------------------------|-----------------------|
| | | | | | | | |

- iii. The following supplementary information:
 - o A copy of the school’s completed verification form (as indicted in item j above) for each graduate employed listed in 1. and 2. above;
 - o 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;

1. For the Basic Cosmetology, Advanced Cosmetology, Barbering, Master Barbering, and Plumbing programs, provide a list of all graduates categorized as “Available for Employment” on the above Graduation and Employment Charts and licensing information in the following format:

| | | | | |
|---|-------------------------|------------------------|------------------------|--------------------------|
| Name of Program | | | | |
| Name of Licensing Agency | | | | |
| Total Number of Graduates Available for Employment (Line #13 on the G&E Chart) | | | | |
| Total Number of Graduates Taking the Exam | | | | |
| Total Number Graduates Passing the Exam | | | | |
| Percentage of Graduates Passing the Exam | | | | |
| DETAIL REPORT | | | | |
| Name of Graduate Categorized as Available for Employment the Graduation and Employment Chart | Class Start Date | Graduation Date | Took Exam (Y/N) | Passed Exam (Y/N) |
| | | | | |

- m. For each program for which the reported rates of graduation, employment, and/or licensure exam passage do not meet the ACCSC benchmark rates, the school must provide an updated assessment of the factors impacting the rates, how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies; and
- n. 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.
3. IETO-Manati must demonstrate the following with regard to student services (*Section VI, Substantive Standards, Standards of Accreditation*)
- The student services program minimally encompasses relevant coping skills (e.g., life, career development, budget, and personal financial planning skills); general development appropriate to higher education students; student retention strategies suited to the school’s programs; academic advising; testing and tutoring services; supervision and monitoring of attendance records and leaves of absence; graduate employment assistance; and information concerning housing, transportation, and child care (*Section VI (A)(3), Substantive Standards, Standards of Accreditation*);
 - The student services program takes into account the number of programs, and size and mix of the student body and that responds to individual student needs (*Section VI (A)(3), Substantive Standards, Standards of Accreditation*); and
 - The school continually monitors and addresses the students’ needs for services (*Section VI (A)(6), Substantive Standards, Standards of Accreditation*).

In the June 7, 2017 Continued Warning Order the Commission found that IETO-Manati provided no evidence as to how the school monitors and addresses the students’ needs for services on an ongoing basis, an assessment of the appropriateness of the available services, student awareness of the services, or the effectiveness of the services on student success. In response the school stated:

The school has continued on an ongoing basis, the monitoring of student needs by means of personal interviews on an individual basis. Students can visit the Counsellors office or the Student Affairs officer, to express any particular need. These offices also receives referral from Faculty members who can also identify a need that students might have. Some of the most

requested and identifiable needs that students have requested assistance in, are transportation, child care and academic tutoring

The school also provided a copy of the Student Affairs Policies and Procedures which includes a list of services such as counseling and placement assistance. The response includes a blank Student Referral Sheet and completed requests for transportation service forms. The Commission noted, however, that the information provided does not show any evidence of tutoring or licensure exam preparation services as mentioned by the school in the item above. It is unclear how students are made aware of the aforementioned exam preparation services.

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

- a. Updated Student Services program information for students to include exam preparation services as well as a copy of updated internal policies and procedures for administering, monitoring, and addresses the students' needs for services on an ongoing basis;
- b. A description of how students are being made aware of the free program review in preparation for the Board Exam which includes both Theory and Practice; assistance available in completing Exam requirements; and transportation to exam including copies of any brochures or flyers;
- c. Evidence of tutoring and exam preparation services provided to students; and
- d. A description of the school's most recent efforts to monitor student needs and documentation of the results of that assessment, as well as a description and documentation of any action taken to address the specific findings of that student needs assessment.

Warning Restrictions and Notification to Students:

Pursuant to *Section VII (K)(7), 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.

The Commission requires the schools 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 **within five (5) days of the receipt of this letter** (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*). The school must provide evidence that the notification to current students has been made and that notification to prospective students is being made in all instances.

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.

IETO-Manati 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.¹ 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.

IETO-Manati 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.

As stated in the [July 1, 2016 Accreditation Alert](#), a \$500 processing fee is assessed when a school is placed on Warning. Accordingly, the school will receive an invoice, under separate cover, in the amount of \$500. 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 8, 2017**. 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 8, 2017**, 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

c: [REDACTED]
[REDACTED]

¹ 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 as it prepares its response to this letter. More information is available under the [Resources section](#) at www.accsc.org.