



Accrediting Commission of Career Schools and Colleges

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December 13, 2017

ELECTRONIC DELIVERY

Center Manager
FlightSafety Academy
2805 Airport Drive
Vero Beach, Florida 32960-2805

School #M000707
Warning

Dear

At the November 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to defer action on the unannounced visit on-site evaluation report, as well as the Application for Renewal Accreditation submitted by Flight Safety Academy (“FSA”) in Vero Beach, Florida. Upon consideration of the May 31, 2017 deferral letter, the August 29, 2017 Team Summary Report (“TSR”) from the renewal of accreditation on-site evaluation conducted on July 18-19, 2017, and the school’s respective responses, the Commission voted to place FSA on **Warning** with a subsequent review scheduled for ACCSC’s **May 2018** 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 Commission Review

May 2016

At the May 2016 meeting, the Commission considered the February 26, 2016 on-site evaluation report from the unannounced on-site evaluation conducted at FSA on December 3, 2015 and voted to defer final action until the February 2017 meeting in order to provide the school with an additional opportunity to demonstrate that the school’s primary educational objective is to prepare students for entrance or advancement in one or more occupations; that the school has remained attentive to students’ educational and other needs; and that the school discloses, minimally, the graduation and graduate employment rate for each program offered as last reported to the Commission. Additionally, the deferral letter provided notice to FSA that if Commission determined that the school’s primary educational objectives no longer conforms with ACCSC eligibility requirements, the Commission would consider additional action.

February 2017

At the February 2017 meeting, ACCSC considered its previous decision to defer action on the February 29, 2016 report from the unannounced on-site evaluation conducted at FSA on December 3, 2015. Additionally, the Commission considered FSA’s request to waive a \$750 late fee assessed to the school by ACCSC. Upon review of the October 16, 2016 deferral letter and the school’s response, the Commission voted to place FSA on Warning with a subsequent review scheduled for ACCSC’s May 2017 meeting. The Commission also voted to waive the \$750 late fee assessed to the school; however, as stated in the July 1, 2016 *Accreditation Alert*, assessed a \$500 processing fee because the school was placed on Warning.

In placing the school on Warning, the Commission directed FSA to demonstrate that the school’s primary educational objective is to prepare students for entrance or advancement in one or more occupations and, if the school provides other educational objectives such as avocational courses and continuing education courses, that any such educational objectives do not have greater priority within the school’s mission and operations than its career-oriented educational objectives (*Section I (B)(1)(d)(i & ii), Rules of Process and Procedure, Standards of Accreditation*).

May 2017

At the May 2017 meeting, ACCSC considered its previous decision to place FSA on Florida on Warning. Upon consideration of the March 3, 2017 Warning letter and the school's response the Commission voted to vacate the Warning and defer action until the August 2017 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards. As required by the Commission in the March 3, 2017 Warning letter, FSA's response included a plan to submit an Application for a New Program Non Degree for the International Pilot Program as a remedy to the Commission's concern regarding the school's primary educational objectives and continued eligibility for ACCSC accreditation.¹

November 2017 Action

1. FSA must demonstrate that the school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation* and demonstrate that the school is supplying the Commission with complete, truthful, and accurate information and documentation showing the school's compliance with all accrediting standards in order to maintain accreditation (*Section I (E)(1), Rules of Process and Procedure, Substantive Standards, Standards of Accreditation*). Specifically, according to the TSR, the Commission noted that as characterized by the team, during the on-site evaluation the school's Human Resources Department refused to allow the on-site evaluation to access personnel files, which prevented the team from assessing the school's compliance with accrediting standards in the following areas:
 - That members of the school management and administrative employees are qualified for their particular roles and possess the appropriate education, training, and experience commensurate with the level of their responsibilities (*Section I (A)(1)(b), Substantive Standards, Standards of Accreditation*);
 - That members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school (*Section I (A)(3), Substantive Standards, Standards of Accreditation*); and
 - That the school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel.

Additionally, as captured under Item #2 of this Warning letter, the Commission noted that the school was unable to provide the team with verifiable records of initial employment as the files for graduates were not readily available to the team for review.

The on-site evaluation team reported that it was unable to conduct a full assessment because: "the FlightSafety International's human resources department refused to provide the team with personnel files and the Academy's director was unable to convince her otherwise" and "[a]s a result, the team could not verify that individuals are qualified for their roles and participate in professional development." As a point of clarification regarding this matter, FSA provided the following explanation in the school's response to the TSR:

¹ The Commission had directed FSA to demonstrate that the school's primary educational objective is to prepare students for entrance or advancement in one or more occupations and that the school's unapproved "contract training" courses do not have greater priority within the school's mission and operations than its career-oriented educational objectives (*Section I (B)(1)(d)(i & ii), Rules of Process and Procedure, Standards of Accreditation*).

FlightSafety HR manager did not deny access to the team regarding the employment information needed for this site visit. The HR manager would not release the entire record to the team leader. This was not acceptable to the team leader. [REDACTED]. She briefed the Center Manager regarding this during the visit. In response to that, the Center Manager got the information we feel shows compliance with the standards, copied it and presented it to the team leader in the presence of the rest of the team. This was not included in the report. FlightSafety understands that the problem is that the team needs the information presented to them without having to ask for it separately. We see that this hindered the visit progress and that when the Center Manager provided the information needed, the team leader chose not to include it.

The Commission understands that there is a difference of perspective here between the on-site evaluation team and the school, but the Commission is primarily interested in determining whether the school complies with accrediting standards and to that end, reminds FSA that the burden rests with the school to demonstrate compliance with accrediting standards. In considering the school's response, the Commission noted that while FSA provided copies of job descriptions, resumes, and continuing education forms for six school personnel in response to the team finding, it is unclear from the response if that information is representative of the entire administration team at the school as the response did not include an organization chart or any other information that explained how the school is being managed in accordance with the requirements outline in the *Standards of Accreditation*. Moreover, in order to provide an opportunity for the Commission to do a more fulsome evaluation of the school's compliance with accrediting standards, the Commission directs FSA to submit the following:

- a. A narrative explanation as to the school's understanding of the explicit expectation that ACCSC-accredited institutions have in supporting accreditation, its burden and obligation to demonstrate continuous compliance with accrediting standards, and the requirement for the school to supply the Commission with complete, truthful, and accurate information and documentation showing the school's compliance with all accrediting standards if the school is to maintain accreditation (*Section I (E)(1), Rules of Process and Procedure, Substantive Standards, Standards of Accreditation*).
- b. In order to demonstrate that all members of the school management and administrative employees are qualified for their particular roles and possess the appropriate education, training, and experience commensurate with the level of their responsibilities (*Section I (A)(1)(b), Substantive Standards, Standards of Accreditation*) and participate in ongoing development and training activities that support their particular roles in the school (*Section I (A)(3), Substantive Standards, Standards of Accreditation*) submit the following:
 - i. A copy of a completed organizational chart to include the names and titles of all individuals currently employed by FSA;
 - ii. Copies of [Staff Personnel Reports](#) for all management and administrative staff members included on the organizational chart in (1)(b)(i), above;
 - iii. A detailed description of the management structure and administrative capacity at the school and an explanation as to how this structure is adequate to support school operations, student services, educational programs, and to ensure ongoing compliance with accrediting standards;
 - iv. A copy of the school's current plan for ongoing development and training activities for all management and administrative staff;
 - v. Documentation of all professional development activities since the July 2017 on-site evaluation; and

- vi. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding staff professional development.
- c. In order to demonstrate that the school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel, submit the following:
 - i. A copy of the school’s recruiting policies and procedures, as well as its procedures for evaluating the performance of recruiters;
 - ii. A list of currently employees that are responsible for recruitment activities along with a completed [Staff Personnel Report](#);
 - iii. A copy of a signed Code of Conduct for each individual captured on the list under (c.)(ii.) above in accordance with *Appendix IV of the Standards of Accreditation*;
 - iv. Copies of the assessments conducted by the school regarding the performance of its recruiters, to include copies of meeting minutes from any recruitment training activities;
 - v. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance in this regard.

2. FSA must demonstrate:

- Successful student achievement to include reporting a student graduation rate that meets ACCSC’s student achievement benchmarks (*Section VII (B)(1)(b), Appendix VI, Substantive Standards, Standards of Accreditation*);
- That the school supports student achievement rates through verifiable records of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*; and
- That the school reported accurate information to the independent third-party responsible for verifying employment data in accordance with the instructions provided in *Section I (H)(1), Rules of Process and Procedures, Standards of Accreditation*.

Specifically, the Commission considered that FSA reported the following graduation rates for the Private Pilot program:

Program (Credential)	Length in Months	Graduation Rate 07/16	Graduation Rate 07/17	ACCSC Benchmark Graduation Rate
Professional Pilot	15	38%	14%	50%

Accordingly, the Commission found that the graduation rate for the Professional Pilot program has significantly worsened, decreasing 24% from the most recent reporting period to 14%, and which falls 36% below the graduation benchmark. FSA’s response acknowledges the poor performance of the Professional Pilot program, referencing that the program “still does not still does not have graduation rates that support ACCSC’s benchmarks. It has been the core of our discussions over the past 3 years.”

The school’s response indicates that graduation rates have been substantially impacted by the low numbers students based in the United States who enrolled in the program and because international students frequently do not graduate because the last step of the program is not required for their licensing approval. In order to remediate this challenge, beginning in November 2017, and in order to maintain eligibility for ACCSC accreditation which requires that the school’s primary educational objective is to prepare students for entrance or advancement in one or more occupations, FSA began enrolling international students into a newly established International Professional Pilot program. FSA

also indicated that as the result of changes to the Federal Aviation Administration regulations concerning hiring of graduates, the school sees a potential for an increase in job opportunities for the number of students based in the United States who enter and complete the Professional Pilot program. FSA's response further posits that the next PAC meeting will focus on this topic as several PAC members are from employers establishing these pathways for graduates.

The Commission considered the school's response but expressed concern on continued viability of the Professional Pilot program given that the graduation rate for the program continues to deteriorate. While the Commission seeks to afford FSA additional opportunities to demonstrate successful achievement outcomes and understands the school's position that the newly established International Pilot Program will likely provide result in improved outcomes for the Professional Pilot program, given that the current graduation rates has decreased to a mere 14%, the Commission is concerned that the strategies implemented up to this point have not produced improved student achievement outcomes. As such, FSA must seriously consider whether the school can offer the Professional Pilot program in a manner that will translate to successful student achievement for the student population served by the school.

Additionally, exacerbating the Commission's concern regarding low graduation rate in the Professional Pilot program is the finding from the TSR indicating that FSA did not demonstrate that the school supports student achievement rates through verifiable records of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*) and the finding regarding whether or not the school reported accurate information to the independent third-party responsible for verifying employment data in accordance with the instructions provided in *Section I (H)(1), Rules of Process and Procedures, Standards of Accreditation*. Based on the TSR, the school only reported three graduates as "Employed in Field;" however, the independent third party reported the total number of students available to sample as eight graduates.

In response to this finding, FSA conceded that the files were "not readily available for the team to verify." FSA also stated that, "our error was not having it presented in a format which was easily accessible for the team when they were asking the questions...[f]rom an audit standpoint this is not acceptable." FSA further noted that the school is aware of the requirements for third-party verification, and while these requirements were adhered to, the results were disorganized. FSA's response indicates that the school understands the responsibility to have student achievement records readily available for the team to review and explains that the manager responsible for this area is on leave and therefore the school is seeking to hire a new compliance officer. FSA's response also includes two sample graduate employment records.

The school's response notwithstanding, the Commission remains concerned that FSA has not reported a student graduation rate that meets ACCSC's student achievement benchmarks for the Professional Pilot program for over two years (*Section VII (B)(1)(b), Appendix VI, Substantive Standards, Standards of Accreditation*) and because the school only provided a sampling of graduate employment records that do not appear to have been subject to independent verification (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). Therefore, the Commission directs FSA to submit the following:

- a. An updated description of the factors impacting graduation rates in the Professional Pilot program; an updated description of the strategies implemented to overcome those factors; an assessment of the impact of the establishment of the International Professional Pilot program on the reported graduation rates in the Professional Pilot Program, and an analysis and assessment of the effectiveness of the school's efforts to improve program viability in the Professional Pilot program.

- b. An update on the hiring of a new compliance manager for the school, to include a copy of the [Staff Personnel Report](#) for this individual.
- c. Minutes from the Professional Pilot and International Professional Pilot programs’ Program Advisory Committee (“PAC”) meetings hosted since July 2017. These minutes must include the date, time, and location of each meeting as well as a comprehensive and clear description of the review and commentary made by the PAC, and should emphasize the review and commentary regarding the programs’ graduation and employment rates.
- d. An analysis of retention activities and a ACCSC Retention Chart² for the Professional Pilot program and the International Professional Pilot program each using a **February 2018 Report Date**.
- e. Graduation and Employment Charts for the Professional Pilot program using a **February 2018 Report Date**.
- 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:

Student Name	Program	Start Date	Graduation Date	Withdrawal/Termination Date

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

Student Name	Program	Start Date	Reason Unavailable	Description of the Documentation on File

- iii. For each graduate classified as employed in the field³ (line #14), provide the following information:

Graduate Name	Program	Start Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ⁴ (i.e., graduate or employer)

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

Graduate Name	Program	Start Date	Description of the Documentation on File

- vi. For each graduate classified as employed in the field⁵ (line #14), provide the following information:

Graduate Name	Program	Start Date	Employer Name, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification ⁶ (i.e., graduate or employer)

² Available for download at <http://www.accsc.org/Content/FormsandReports/FormsAndReports.asp>

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.

⁵ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

⁶ Appendix VII (4) – Guidelines for Employment Classification requires the school to verify the employment classification.

vii. Supporting and verifiable documentation or a narrative justification for each graduate in (v.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.

viii. For each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

Graduate Name	Program	Start Date	Description of the Documentation on File

viii. For each graduate classified as “Graduates-Further Education” or “Graduates-Unavailable for Employment”, provide the following information:

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

g. For the Professional Pilot program, FSA must [engage with a third-party](#) to verify a 25% sample of the employment data reported on the Graduation and Employment Chart submitted in accordance with (e.) above as follows:

i. The independent third-party verifier must select minimally a 25% sample of employed graduates (classified as “Graduates - Employed in the Field”) on line 14 of the Graduation and Employment Chart submitted and to report the verification results from that sample. Once the 25% sample has been selected by the independent third-party verifier for the purposes of this Employment Verification Report, the independent third party may not alter the sample in an effort to get better results.

ii. The independent third-party verifier must verify employment records from the employer or graduate either verbally or in writing.

iii. The independent third-party must verify the employment data in a manner independent from the school. The independent third party must conduct the verifications without assistance from the school, with the exception of the school’s provision of records to be verified.

iv. The school must provide the full-unadulterated Employment Verification Report from the independent third-party verification of employment data submitted to ACCSC.

v. The school must submit a summary of the employment verification results as follows:

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

- h. Any additional information, **to include additional contemporaneous retention, graduation, or employment data** for both the Professional Pilot program and the International Professional Pilot program 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. FSA must demonstrate that the school’s advertising and promotional materials are truthful and accurate and avoid leaving any misleading impressions with respect to the school and its name (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). Specifically, while the school’s approved name with ACCSC is FlightSafety Academy, according to the TSR, the school rebranded and changed the website and all print materials to reference the name “FlightSafety International.” According to the TSR, the school did not submit an Application for a Change of Name as required. In response to this finding, FSA indicated that the website references both the parent company (“FlightSafety International”) as well as the academy (“FlightSafety Academy”). While the school’s response indicates that FSA does not see this as confusing, the Commission does not agree with the school’s assessment. Specifically, while the URL for the school’s website, www.flightsafetyacademy.com clearly identifies the recognized name of the school, the main banner of the home page clearly references the name Flight Safety International, and the main page highlights courses like the “Growth and Achievement Preparation Program” which is not accredited by ACCSC, and includes links to an agreement between the school and West Virginia University that references Flight Safety International. Therefore, the Commission did not find that the school’s recognized name is clearly and consistently being disclosed in the school’s advertisements.

Based on the foregoing, FSA must either:

- a. Provide copies of ALL of the school’s current advertisement’s, including the URL for the school’s website which clearly and consistently identifies the name of the school as recognized by ACCSC (e.g., FlightSafety Academy) or
- b. If the school elects to use FlightSafety International as its designated name, to review the requirements for the approval of a change of name as explained under *Section IV (E)(3), Rules of Process and Procedure, Standards of Accreditation* and file the requisite applications for a change of name (available online under the [Forms section](#) at www.accsc.org).
4. 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 (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*). Therefore, FSA must provide:
 - a. A copy of the notice provided to current and prospective students regarding the Warning action; and
 - b. An attestation, signed by the designated school official, which indicates the date that all current students were notified of the Warning action.

Warning Restrictions:

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.

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.

FSA 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.⁷ 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.

FSA must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before March 30, 2018**. If a response, the required fee,⁸ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before March 30, 2018** 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]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

⁷ 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.

⁸ ACCSC assess a \$500.00 processing fee to schools placed on Warning.