June 10, 2020

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

School #M072307
Probation

At the May 2020 meeting, the Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") considered the previous decision to continue Construction Training Center ("CTC") located in Columbia, South Carolina on Warning in relation to the school's Application for Renewal of Accreditation. Upon review of the November 18, 2019 Warning letter and the school’s response, the Commission voted to continue CTC on Probation with a subsequent review scheduled for ACCSC’s November 2020 meeting. The reasons for the Commission’s decision and the Commission’s requirements for CTC to demonstrate compliance are set forth below.

History of the Commission’s Review:

- At the February 2019 meeting, the Commission considered the Application for Renewal of Accreditation submitted by CTC and upon review of the November 21, 2018 Team Summary Report and the school’s response to that report, the Commission voted to place CTC on Warning with a subsequent review scheduled for the August 2019 meeting. The 24 areas cited by the Commission included management and administrative capacity; ongoing training for school management and administrative employees; appropriate administrative and operational policies and procedures; refund policy; budget; student attendance; leave of absence; student achievement; third-party verification; initial employment information; ongoing training for faculty; institutional assessment and improvement planning; student services; course syllabi; recruiting and admissions; faculty prior work experience; program advisory committee; learning resource system; records of denial of admissions; disclosures; advertising; program approval; safety equipment; and fire safety standards.

- At the August 2019 meeting, the Commission considered the previous decision to place CTC on Warning and upon review of the March 27, 2019 Commission letter and the school’s response, the Commission voted to continue CTC on Warning with a subsequent review scheduled for the May 2020 meeting. The 15 areas cited by the Commission included management and administrative capacity; ongoing training for school management and administrative employees; appropriate administrative and operational policies and procedures; refund policy; leave of absence; student achievement; third-party verification; initial employment information; ongoing training for faculty; student services; course syllabi; recruiting and admissions; faculty prior work experience; program advisory committee; and safety equipment.

May 2020

1. CTC did not demonstrate that the school has adequate management and administrative capacity in place that includes owners, board members, members of school management, and administrative employees who are qualified for their particular roles and who possess the appropriate education, training, and experience commensurate with the level of their responsibilities (Section I (A)(1)(a), Substantive Standards of Accreditation). Based on the quantity and nature of Team Findings identified by the on-site evaluation team; the number of issues in the March 27, 2019 Warning letter; the number of issues
in the November 18, 2019 Continued Warning letter, and the number of issues that remain as set forth in this Probation letter, the Commission determined that CTC’s leadership has not demonstrated the administrative capacity sufficient to ensure operation of the school in compliance with accrediting standards.

Qualifications

In addition to the number of items that remain as set forth in this probation letter, in reviewing the response regarding verification of prior work experience for the management and administrative staff, the Commission remains concerned as to whether the school has full-time on-site supervision by a 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. In particular, [redacted] who “does not have prior work experience” and was “brought in after college studying Business Administration” previously held the role of Chief Financial Aid Officer and currently holds the role of Vice President with the oversight and responsibilities of:

- Creating, communicating, and implementing the school vision and mission;
- Leading, guiding, directing, and evaluating the work of staff: Director of Student Operations, Chief Financial Officer, Chief Financial Aid Officer, and Administrator;
- Organizing Program Advisory Committee meetings;
- Hiring, supervising, evaluating, and dismissal of faculty; and
- Tracking professional development quarterly for all faculty and staff.

The response does not demonstrate how someone with no prior work experience can lead, guide, direct, and evaluate the work of other staff in an accredited postsecondary school.

In addition, the response does not include a job description for [redacted], listed on the Organization Chart as Admissions/Director of Student Operations, and thus, does not provide the Commission an opportunity to assess his level of responsibilities. Additionally, the Commission noted the school has had three different people overseeing Financial Aid since the on-site evaluation in November 2018, which is particularly concerning given the continued refund issues as listed in this Probation letter. In reviewing the organizational chart in the response compared to the organization chart published on the school’s website, the Commission found [redacted], Administrator, is listed on the website’s organizational chart but no information pertaining to her role at the institution is included in the school’s response.

Board of Directors

In response to the November 18, 2019 Continued Warning letter, as directed, the school submitted two updated descriptions of the role of the Board of Directors including a “Board of Directors, Faculty & Staff” (no date) policy and procedure that states:

The Board of Directors are to appropriate actions where it is necessary to ensure that Construction Training Center maintain [sic] its basic mission in accordance with the Articles of Incorporation and By-Laws. The board is to approve the institutional purpose, objectives, philosophy, and biblical foundations and to also review these regularly to ensure that they are being pursued faithfully.

Board of Directors:
Establish all operating policies and approve institutional goals for Construction Training Center to be implemented by the administration. Care and consideration will be taken to distinguish between the policy making functions of the Board and responsibilities of the administration and faculty to implement the policies.

Similarly, the “CTC-BDFS032 Board of Directors, Faculty & Staff” (established April 18, 2019) as listed in the school’s Policy and Procedure Manual states that the purpose of the Board of Directors is as follows:

Advise [sic] to establish all operating policies and have input in the institutional goals for Construction Training Center to be implemented by the administration. Guidance to set visions and goals. Measures the success of the school against the set school goals. Inspect the Audit and Budget of the school. Care and consideration will be taken to distinguish between the policy making functions of the Board and responsibilities of the administration and faculty to implement the policies.

Upon review of the above information, it appears to the Commission that the role of the Board of Directors has ultimate authority for school operations – i.e., “[t]he board is to approve the institutional purpose, objectives, philosophy, and biblical foundations and to also review these regularly to ensure that they are being pursued faithfully” and “establish all operating policies.” While the school has previously asserted in response to the November 21, 2018 Team Summary Report that “President [REDACTED] is committed to being in compliance and having a qualified administrative staff,” implying that school administrators are ultimately responsible for compliance with accrediting standards, it appears the school staff are only responsible for implementing the policies and are not responsible for the creation of policies.

The November 18, 2019 Continued Warning letter directed CTC to submit a list of the Board of Directors along with an explanation for each as to their qualification to serve on the board as a means to determine whether the board members are qualified to fulfill the oversight roles as described above. In response, the school provided a chart with 10 members with qualification titles such as Employment Specialist, Marking Specialist, Business Financial Specialist, Educational Specialist, Business Specialist, and Community Relations Specialist. The school however did not provide any information as to how these individuals are actually qualified to serve on a Board of Directors, which has authority and responsibility for the direction and policymaking decisions.

The Commission had also asked the school to submit minutes from board meetings. In response, CTC submitted minutes that appear to indicate that the board is in control of the school and its staff, despite the fact that [REDACTED] is 100% owner of the school. The minutes appear to show that the board members are directing actions and holding staff accountable, for example:

- [REDACTED] to make sure we comply to all procedures. To make sure we do refunds and disbursement in a timely manner.
- [REDACTED] stated that before you even start admissions process make sure that you get a copy of the high school diploma or GED because you don’t want that to be recurring finding in the next audit
- [REDACTED] to make sure to continue doing SAP for each student each week
stated this [Student Learning Resource System] policy goes hand in hand with student retention. If you see a student not doing their best/or doing their best communicate with them, counsel them and assist them. If faculty and staff can’t assist the student assist them with an outside counselor. All board members agree with.

To make sure to keep the graduation and employment/placement rates up to date. Sometimes that is the first thing a prospective student may look for.

Like the graduation and employment rate you make sure to keep the curriculum updates as well.

that we must have continuous development and training

It is simply not clear whether the owner, , has ultimate control\textsuperscript{1} of the direction and actions of the school, as the record with ACCSC indicates, or whether the board has ultimate control.\textsuperscript{2}

Overall, the school has not demonstrated that those responsible for the oversight and administration of the school are qualified to fulfill these roles – this concern is fueled by the school’s continued failure to demonstrate compliance in several key areas required by accrediting standards.\textsuperscript{3} Based on the foregoing, the Commission directs CTC to submit the following:

a. An explanation for who has ultimate control of the direction and actions of the school and, if applicable, an ACCSC Application for Change of Control;

b. An explanation of role at the school and why she is listed on the website’s organizational chart but not on the organization chart provided by the school, along with a job description and information and documentation pertaining to her position, as applicable;

c. Completed job descriptions and résumés for each position listed on the organization chart along with a narrative for how each person is qualified for their role;

d. A listing of the Board of Directors, their titles, current affiliations, and an explanation for each as to their qualification to create policies and procedures that meet Accrediting Standards;

e. An updated description of the role of the Board of Directors along with any changes made to the policies and procedure manual in response to the findings set forth herein;

f. Meeting minutes and agendas for any Board of Directors meeting held since the submission of the response to the November 18, 2019 Continued Warning letter;

g. Meeting dates for any upcoming Board of Directors meeting in 2020; and

h. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards in this regard.

\textsuperscript{1} Section IV (E)(2), Rules of Process and Procedure, Standards of Accreditation states that control is the ultimate ability to direct or cause the direction of the actions of a school.

\textsuperscript{2} If the owner of the school has ceded control to the Board of Directors, then that school would be responsible for submitting an ACCSC Application for a Change of Control.

\textsuperscript{3} Upon its next review, the Commission will take into consideration the totality of the school’s response to this Probation letter and the extent to which that response demonstrates the school’s ability and willingness to engage in substantial action. CTC must be able and willing not only to demonstrate current compliance with standards, but also an understanding of the requirements of accreditation as an ongoing process that will ensure that the school remains in continuous compliance with standards.
2. CTC did not demonstrate that members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school (Section I (A)(3), Substantive Standards, Standards of Accreditation). The TSR states that professional development activity in 2017 appeared to be isolated or episodic activity rather than ongoing activities (the school was unable to demonstrate any documented professional development or continuing education activities for managers or administrative staff in 2014, 2015, 2016, or 2018). In response to the TSR, CTC stated that the school now requires each staff member to “refer to the professional development section of the ACCSC website” and “complete at least one webinar on the ACCSC site per month” with a certificate of completion to be placed in their personnel file. In addition, “Vice President [Redacted] and Director of Students [Redacted] will seek professional development opportunities beyond the ACCSC website for themselves and other faculty/staff members.” The school did not, however, provide any documentation demonstrating staff members have completed any ACCSC webinar trainings or other professional development opportunities.

As such, the March 27, 2019 Warning letter directed CTC to submit professional development information along with supporting documentation for all school staff. In response to the March 27, 2019 Warning letter, the school implemented mandatory “Lunch and Learn (L&L) Webinar Sessions” to be held “on the 1st or 3rd Friday of the month” and provided signed agreements. In reviewing the documentation from the lunch and learn sessions, the Commission noted that although everyone appears to attend each training, the trainings do not necessarily support each individual’s particular roles in the school. Specifically, all staff, no matter their role, attended the trainings in the areas of curriculum development, ACCSC Accreditation Process, and Third-Party Verification of Placement. Therefore, the November 18, 2019 Continued Warning letter directed CTC to submit updated professional development information and expectations for each staff member; evidence that the trainings support their particular role; and supporting documentation of completed professional development activities.

In response to the November 18, 2019 Continued Warning letter, CTC provided a list of staff and the corresponding training for each person with the statement:

*Construction Training Center recognizes that our efforts to comply with a professional development plan suitable to ACCSC it [sic] must include courses that will provide supporting in each staff members particular roles. The following management and administrative employees have agreed to enroll and complete the suggested course listed as a part of their professional development plan in 2020 at a minimum.*

The information provided, however, does not include any details about how the documentation demonstrates the school is following its own Policies and Procedures (“P&P”) Manual, which requires completion of coursework on a quarterly basis and monitoring of the plans by the vice president. When comparing the list of staff and training with the school’s organizational chart, the Commission noted [Redacted], Recruiter, is not included in the training documentation. Additionally, in reviewing the supporting documentation of completed professional development activities, the Commission found the following:

- The documentation of training completed by President/CEO [Redacted] is signed by [Redacted] which implies he trained himself;
- The documentation for [Redacted] includes the completion of two (2) courses in March 2020 with the titles “2019-20 Verification” and “Awarding Pell in a Nonterm or Clock-hour Program,” that do not match the listed items of “FA110 Developing an Efficient Financial Aid Office” and “FA110 Financial Aid Management – Compliance with Compromise”; and
• Other than [redacted] all other documentation is dated prior to September 2019 which appears to indicate that no additional training was completed for any staff member for the 6-month period of October 2019 – March 2020 while the P&P Manual section titled, “Employee Development and Training” established on April 13, 2019, indicates that “all employees should participate in quarter training to increase their knowledge and skills.

While the Commission recognized the school’s efforts, the response does not provide sufficient evidence that these employees are participating in development and training activities in an ongoing manner. Based on the foregoing, the Commission directs CTC to submit the following:

a. A narrative for how each management and administrative employee is engaging in ongoing development and training activities that support their particular roles in the school and aligns with the school’s P&P Manual;

b. Supporting documentation of completed professional development activities to follow the school’s P&P Manual; and

c. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards in this regard.

3. CTC did not demonstrate that the school has appropriate administrative and operational policies and procedures to which the school adheres and reviews and updates as needed (Section I (A)(1)(d), Substantive Standards, Standards of Accreditation). The on-site evaluation team found that CTC did not have written policies and procedures beyond the brief policy statements provided in the school catalog and that in many operational areas staff indicated that school practice differs from the expectations set forth in the catalog. In response, the school stated the following (but did not provide a copy of the below-mentioned manual):

    CTC is formulating a new policies and procedures manual that will reflect actual daily operations and practices occurring and to keep the various areas of the school in compliance. This new manual will be an expansion of documentation found in the student catalog to offer step by step procedures for the administrative staff. The Policies and Procedures Manual will be updated regularly as needed.

In the March 27, 2019 Warning letter, the Commission directed the school to provide a copy of the revised P&P Manual. In response, the school provided the “Policy and Procedures Manual – Construction Training Center Edition: 2019-2020.” In reviewing this manual, the Commission noted that the manual refers to the school as a “University” and references an Ability-to-Benefit policy, however, it does not appear that the school enrolls ability-to-benefit students. Additionally, CTC did not provide any information on the school’s plans to review and update the policies and procedures as needed. As such, the November 18, 2019 Continued Warning letter directed CTC to submit an updated P&P Manual that correctly identifies the school and the school’s policies along with the school’s plan to review and update the policies and procedures manual as needed.

In response to the November 18, 2019 Continued Warning letter, CTC submitted an updated P&P Manual and stated that:

    The corrections have been made to the Policy and Procedures Manual, removing any reference to “university” and enrollment of ability to benefit students. An updated copy of the manual is attached (See Exhibit 3, Updated Policy and Procedure Manual) Construction Training Center seeks to review its manual periodically to remain in compliance with ACCSC. Typically, changes are made to the manual once we discover an area that needs to be addressed or
situations that threaten being compliant. Construction Training Center will review the manual annually to ensure proper procedures are being followed or in need of adjustment.

However, in reviewing the updated P&P Manual, the Commission found the “Employee Development and Training” section continues to reference the “University’s mission.” As such, CTC must submit an updated P&P Manual to remove all references to “university.” In addition, the school should submit updated policies and procedures for any additional areas as directed hereto in this Probation letter.

4. CTC did not demonstrate that the school has and applies a fair and equitable refund policy in compliance with state or third-party requirements, or in the absence of such requirements, in accordance with generally accepted practices (Section I (D)(5), Substantive Standards, Standards of Accreditation). The TSR states that CTC received a letter from the U.S. Department of Education School Participation Division, Atlanta Compliance Manager, informing CTC that the school was not using the correct documents and calculation process for student refunds. In summary, the school appears to have been calculating refunds based on the proportion of total program completed, rather than the proportion of the current payment period. In addition, CTC has not yet issued supplementary refund payments as needed to correct the erroneously calculated refunds. Additionally, school staff provided inconsistent statements regarding the timeframe in which refunds must be paid, and the school does not appear to possess documentation of the dates on which refunds are paid, stating that a third-party servicer, [redacted], processes the school’s post-withdrawal disbursements.

In response to the TSR, CTC acknowledged the error in the calculations noting that “[w]ith the wrong calculation, all withdrawal students Total IV [sic] aid to be returned was $0,” that the school continues to work with the Department of Education School Participation Atlanta Compliance Manager, and that “[o]nce all R2T4 has been reviewed by [redacted], CTC will be put on a payment plan to repay all refunds.” In addition, the school provided an updated policy as listed in the Student Catalog that states “[a]ny money to be refunded to the students will be paid within forty (40) days of denied acceptance, the last documented date of attendance, or formal termination by the school” along with a blank copy of the R2T4 Format Sheet. The Commission, however, found that it was unclear if a student had both a last documented date of attendance and formal termination date and if these dates were different, which date would be utilized by the school. Additionally, CTC stated that “[t]he Financial Aid department will tape the refund policy on their wall, to ensure they are complying.” However, the school did not submit any documentation to demonstrate staff has been trained on the updated refund policy.

As part of the response to the March 27, 2019 Warning letter, CTC indicated that the school established a new R2T4 policy; hired [redacted] for the newly created director position “to oversee daily operations of the financial aid department;” provided an update on the communications with the DOE; and submitted information on refunds issued to students between January 1, 2019 and May 31, 2019. In reviewing the information provided, the Commission noted the updated “Refund Table for $13,000.00 900 Hour Course” that only lists up to 640 in the “Hours Attended” column while listing the full program cost, which may lead to confusion by students. In addition, the refund calculations are based on a 450-hour payment period but that is not clearly indicated in the chart. As such, the November 18, 2019 Warning letter directed CTC to provide clarification on the Refund Table for the 900 Hour program and whether the table includes multiple payment periods.

In response to the November 18, 2019 Warning letter, the school provided an updated P&P Manual, which includes the following table. However, in reviewing the information provided in the table, the Commission noted that the “Refund Amount” does not match the “% Refund” as follows:
As this chart has yet to be correct over the course of more than 12 months, the Commission directs CTC to update the chart indicating clearly to students how refunds are calculated or to remove the chart completely. Further, in reviewing the refund reports between June 1, 2019 and February 29, 2020, the Commission found that in practice, the school’s refund policy differs from the information listed above. For example, student [redacted] attended a total of 35 program hours and was refunded 92% of collected tuition whereas the chart above would indicate that the student should only have been refunded 90%. In addition, the Commission noted discrepancies for six (6) of eight (8) students when reviewing the backup documentation for refunds between June 1, 2019 and February 29, 2020 including:

- For [redacted], the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form at the top lists the “Date of school’s determination that the student withdrew” as September 27, 2019 but the “Withdrawal date” in Step 2 lists September 20, 2019;
- The ACCSC Refund Report Worksheet for [redacted] indicates no refund required but the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form indicates a refund of $3,400.36 and does not include any documentation of the refund;
- For [redacted], the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form at the top lists the “Date of school’s determination that the student withdrew” as September 27, 2019 but the “Withdrawal date” in Step 2 lists September 20, 2019;
- For [redacted], the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form at the top lists the “Date of school’s determination that the student withdrew” as July 25, 2019 but the “Withdrawal date” in Step 2 lists July 16, 2019;
- For [redacted], the ACCSC Refund Report Worksheet lists the “Date of Determination of termination/withdrawal” as August 15, 2019 but the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form lists the “Date of school’s determination that the student withdrew” and “Withdrawal date” in Step 2 lists June 26, 2019;
- For [redacted], the ACCSC Refund Report Worksheet lists the “Date of Determination of termination/withdrawal” as September 30, 2019 but the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form lists the “Date of school’s determination that the student withdrew” as September 03, 2019 and “Withdrawal date” in Step 2 lists August 30, 2019; and
- For [redacted], the ACCSC Refund Report Worksheet lists the “Date of Determination of termination/withdrawal” as September 27, 2019 but the Treatment of Title IV Funds When A Student Withdraws From A Clock-Hour Program form lists the “Date of school’s determination that the student withdrew” as September 27, 2019 and “Withdrawal date” in Step 2 lists September 20, 2019.
Additionally the Commission noted there continues to be a discrepancy in the length of time for a refund. Specifically, the “DOE Refund & CTC Refund” policy in the P&P Manual states that:

After classes begin, if the student withdraws, or is terminated, their tuition will be refunded on a prorated basis as outlined below. Any money to be refunded to the students will be paid within forty (40) days of denied acceptance, the last documented date of attendance, or formal termination by the school.

However this conflicts with the information provided by CTC on the ACCSC Refund Worksheet which lists 45 days as the “maximum number of days for which the school must disburse refunds, as defined in the school’s refund policy” and the 2019-2020 Student Catalog that states:

After classes begin, if the student withdraws, or is terminated, their tuition will be refunded on a prorated basis as outlined below. Any money to be refunded to the students will be paid within forty (45) days of denied acceptance, the last documented date of attendance, or formal termination by the school.

The Commission found that for if the Date of Determination was September 27, 2019 then the refund made on November 7, 2019 would be beyond the 40 day period for the return of funds as listed in the P&P Manual and thus considered late. The school did not provide any narrative response to the items that required an explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school’s refund policies.

In relation to the U.S. Department of Education’s (“the Department”) on-going monitoring, payment plan, and communication, the November 18, 2019 Continued Warning letter directed the school to provide an updated on the payment plan to repay all previous refunds along with documentation of any communication with the Department. In response, CTC did not provide copies of any communication from the Department or any indication whether the school had received any documentation. The school only provided a letter on school letterhead dated March 5, 2020 and signed by that states:

To Whom It May Concern:

This is to advise that CTC still have [sic] an ongoing payment plan with the Department of Education and is currently making progress towards complete repayment of current payment plan.

With the change in employees, discrepancies in the refund documentation provided, lack of documentation provided for training, and limited response as it relates to the Department’s oversight, the Commission’s concerns are heightened as CTC is unable to demonstrate the ability to consistently and correctly process refunds. Based on the foregoing, the Commission directs CTC to provide the following:

a. An update on the payment plan to include details of the plan (i.e., timeline, number of payments completed, estimated date of repayment completion, etc.) to repay all previous refunds along with documentation of any communication with the Department of Education;

b. A more clearly and consistently depicted Refund Table;

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4 If the information requested below includes personal identifying information (i.e., social security numbers), then please redact that information in the response.
c. A copy of the school’s refund policy as listed in the school’s P&P Manual, catalog, and enrollment agreement, ensuring that the P&P Manual, catalog, and enrollment agreement consistently disclose the school’s refund policy;

d. A list of all personnel who process refunds along with documentation of financial aid training completed since the submission of the response to the November 18, 2019 Continued Warning letter, if applicable;

e. An explanation for the date discrepancies identified in this letter for the six (6) refunds processed between June 1, 2019 and February 29, 2020;

f. An ACCSC Refund Report for all refunds issued to students who were either dismissed or withdrew between March 1, 2020 and August 30, 2020 to include the enclosed the Refund Report Summary Sheet, Refund Report Worksheet, individual attendance records to include documentation of approved leave of absences (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student refunds;

g. An explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school’s refund policies; and

h. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding the school’s refund policy or practices.

5. CTC did not demonstrate that the school terminates students who do not return following a leave of absence and applies the school’s refund policy in accordance with applicable and published requirements (Section VII (A)(3)(c)(iii), Substantive Standards, Standards of Accreditation). The TSR notes that CTC’s policy states that a student’s leave of absence may not exceed 30 days; however, school staff indicated that CTC did not apply any clear policy to terminate students who fail to return from a leave of absence after 30 days. In response to the TSR, CTC “created a new form for students [to] request a leave of absence before taking leave” and included on the form the “penalty of termination if he/she does not return in 30 school days.” In addition, the school submitted a Leave of Absence Form and letter from [redacted], a student taking a leave of absence. In reviewing the documentation provided, the Commission found that the student signed the Leave of Absence Form on September 18, 2018 with a Scheduled Return Date of October 30, 2018, which does not appear to conform to the school’s policy that a leave of absence may not exceed 30 days.

The March 27, 2019 Warning letter directed CTC to submit the school’s policies and procedures; a list of personnel who process leaves of absence along with documentation of their training on the updated policy; and information on students who took a leave of absence between April 1, 2019 and May 31, 2019. As part of the response to the March 27, 2019 Warning letter, the school’s updated policy states:

A leave of absence is requested by students who wish to withdraw from the current quarter, or who do not wish to attend a future quarter (Excluding summer as the starting term). Staff must utilize the new student leave of absence (LOA) form before a student takes leave. The form indicates the penalty of termination if he/she does not return in 30 school days. The student must sign the form along with the Director of Student Operations and Financial Aid Director and placed on file. All request of LOA form must come from the Financial Aid Office.

The Commission found that the updated policy may be misleading to students, as it appears to imply that if a student wishes to withdraw he/she will be placed on a leave of absence instead. Additionally, the Commission noted discrepancies with the two (2) students placed on a leave of absence between
April 1, 2019 and May 31, 2019. As such, the November 18, 2019 Commission letter directed CTC to submit a copy of the school’s updated P&P Manual addressing leave of absence, the leave of absence policy as listed in the catalog; explanations for the previous discrepancies; and information for students taking a leave of absence between June 1, 2019 and February 29, 2020.

Upon review of the response to the November 18, 2019 Continued Warning letter, the Commission noted both the catalog and P&P Manual continue to state that “[a] leave of absence is requested by students who wish to withdraw from the current quarter, or who do not wish to attend a future quarter (excluding summer as the starting term).” The Commission directs CTC to update the LOA policy to remove this language, as students who wish to withdraw from the current term or not attend a future term may not be eligible for a LOA. In addition, the Commission found the following in relation to LOAs:

- The school’s policy as listed in the catalog does not include the acceptable reason(s) why a student may request a leave of absence;
- The P&P Manual states that the “[r]equest form comes from the Director of Financial Aid along with their signature, followed by documented hours used and hours scheduled, as well as a signature from the Director of Student Affairs,” however, the there is no Director of Student Affairs listed on the school’s organizational chart;
- The LOA policy states that “[a] student must be enrolled for at least 30 school days before he/she can request for LOA,” however, the Leave of Absence Form does not include any indication that this requirement is reviewed as the form only lists the number of hours used and the number of scheduled hours; and
- Neither the catalog nor the P&P Manual indicate the maximum length of the LOA, only that “[a] student can only take LOA [sic] once per quarter.”

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

a. A copy of the school’s updated leave of absence policy as found in the school catalog;
b. A copy of the school’s updated leave of absence policies and procedures;
c. An explanation for how the school ensures students have been enrolled for at least 30 school days prior to requesting an LOA;
d. A list of students who requested and took a leave of absence between June 1, 2020 and September 30, 2020;
e. Appropriate documentation of the leave of absence for any student listed in (d.) above; and
f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding the school’s leave of absence policy or practices.

6. CTC did not demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education (Section VII (B)(1)(b), Substantive Standards, and Appendix VI, Standards of Accreditation). In response to the March 27, 2019 Warning letter using a January 2019 Report Date on the Graduation and Employment (“G&E”), Charts, the school reported the following student achievement rates:
The Commission found that CTC reported graduation rates and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.\(^5\) Additionally, while the Commission is aware of the small cohort sizes for the programs, the Commission is concerned with the significantly low graduation rates for the current 6-month versions of the programs. The Commission directed CTC to provide student achievement improvement plans for the Form Carpentry (Diploma) and Rod Buster (Diploma) and a G&E Chart using a January 2020 Report Date for each program along with back up documentation.

In response to the November 18, 2019 Warning letter, CTC noted that:

*College 360 as of March 5, 2020 did not allow Construction Training Center to create a Graduation and Employment Chart for the Form Carpentry program and Rod Buster program with a report date of January 2020. We can forward the completed chart once it becomes available. Please see the attached screen shot showing the unavailability of the report.*

The Commission reminds CTC that College 360 will only allow the school to submit the yearly annual report and directs the school to use the G&E Chart located on the Commission’s website (www.accsc.org) for other submissions.

In addition, the Commission considered the information submitted by CTC as part of the 2019 Annual Report using a July 2019 Report Date on the G&E Charts and reporting the following student achievement rates:

<table>
<thead>
<tr>
<th>Program (Credential)</th>
<th>Length in Months</th>
<th>CTC Graduation Rate</th>
<th>ACCSC Benchmark Graduation Rate</th>
<th>CTC Employment Rate</th>
<th>ACCSC Benchmark Employment Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Form Carpentry (Diploma)</td>
<td>4</td>
<td>67%</td>
<td>73%</td>
<td>33%</td>
<td>70%</td>
</tr>
<tr>
<td>Rod Buster (Diploma)</td>
<td>4</td>
<td>60%</td>
<td>73%</td>
<td>63%</td>
<td></td>
</tr>
<tr>
<td>Form Carpentry (Diploma)</td>
<td>6</td>
<td>20%</td>
<td>73%</td>
<td>100%</td>
<td></td>
</tr>
<tr>
<td>Rod Buster (Diploma)</td>
<td>6</td>
<td>40%</td>
<td>73%</td>
<td>100%</td>
<td></td>
</tr>
</tbody>
</table>

The Commission found that CTC reported graduation rates and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.\(^6\) In addition, the Commission found the following:

- While the graduation rate for the 6-month Form Carpentry (Diploma) increased from 20% to 26%, the graduation rate remains significantly below benchmark and only seven (7) of 27 students graduated;

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\(^5\) Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VII - Student Achievement Rates.

\(^6\) Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VII - Student Achievement Rates.
• The graduation rates decreased by 10% for the 4-month Rod Buster (Diploma) and 6-month Rod Buster (Diploma) with only three (3) of six (6) students and 13 of 43 students graduating respectively; and

• The employment rates for the 6-month Form Carpentry (Diploma) and 6-month Rod Buster (Diploma) fell below benchmark.

The November 18, 2019 Warning letter directed CTC to submit a copy of the school’s student achievement improvement plan for both programs specifically addressing any modifications or improvements, yet despite the significantly low student achievement rates, CTC stated that:

_The school hasn’t made any significant changes in admission requirements and processes or curriculum modifications. The school has however made efforts to enhance students [sic] services to include resume building to increase student employability. In addition the school began working with two local construction companies, [redacted], and [redacted] to offer graduates entry level positions._

While the Commission acknowledged the efforts to improve the employment rates and increase student employability, the Commission cannot overlook that the graduation rates dropped for the 6-month Rod Buster and Form Carpentry program versions. Additionally, the Commission’s concern is heightened as it appears that the school has not made any significant changes in admissions, curriculum modifications, or student support services focused primarily on retention and employment.

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

a. A student achievement improvement plan for the Form Carpentry (Diploma) and Rod Buster (Diploma) programs specifically addressing any modifications or improvements implemented in the following areas:
   i. Admissions requirements and process;
   ii. Curriculum modifications;
   iii. Student Services; and
   iv. Career services and employer engagement.

b. An evaluation of current retention trends and employment trends including an assessment as to when the programs’ student achievement rates are expected to meet ACCSC’s benchmark rates.

c. A Program Viability Study for the Form Carpentry (Diploma) program and the Rod Buster (Diploma) program that, given the low reported student achievement rates, specifically addresses:
   • Whether the school’s program offerings adequately prepare students for entrance or advancement in training related occupations;
   • Internal and external review and validation of the program content and objectives; and
   • An analysis of the job opportunities for the school’s graduates in each of the school’s program offerings.

d. A Graduation and Employment Chart (as found on ACCSC’s website and not in College360) for the Form Carpentry program and the Rod Buster program using July 2020 as the Report Date;

e. Summary information for each Graduation and Employment Chart organized according to the corresponding cohort start date reported on the chart (line #1) as follows:
i. For each student start, provide the following information:

<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>
</table>

iii. For each graduate classified as employed in the field7 (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 Verification8 (i.e., graduate or employer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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:

<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>

v. From the list in (iii.) 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>

vi. 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>
<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>
<td></td>
</tr>
</tbody>
</table>

f. An analysis of retention activities and ACCSC Retention Charts9 for each program offered at the school using a September 2020 Report Date; and

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.

7 See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.
8 Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.
9 Available for download at http://www.accsc.org/Content/FormsAndReports/FormsAndReports.aspx
instructions set forth in Section VII (C) of the Self Evaluation Report. In response to the TSR, CTC stated “[a]fter getting a better understanding of the requirement, Vice President [redacted] made the initial contact with [redacted] and that “[t]he school is awaiting a demonstration and prices list” but that “the school will purchase the service and begin using it for third party verification.” In addition, the school stated that “CTC will use the [redacted] third party verification for all students reporting employment after graduation.”

As such, in the March 27, 2019 Warning letter the Commission directed the school to provide a copy of the independent third-party review of the ACCSC 2018 Annual Report data. In response to the March 27, 2019 Warning letter, CTC stated that “due to time constraint they will not be able to conduct verification until July 1st” and that “[o]nce completed, it will be sent.” Therefore, the November 18, 2019 Warning letter directed CTC to submit the independent third-party review of the ACCSC 2018 Annual Report.

In response to the November 18, 2019 Warning letter, CTC stated:

Since the last response letter, Construction Training Center contacted [redacted] as its third party verification. [redacted] worked closely with the school to generate a verification report, but because of missing documentation as noted in the previous report was unable to complete the verification. As of 8/6/2019 the population chart was missing information for 5 students in the sample. Construction Training Center was unable to retrieve the information from the former students to complete the verification.

The Commission is concerned that the school has yet to produce an independent third-party verification of graduate employment records from the 2018 Annual Report despite engaging with multiple third-party auditors. The Commission noted that the 2018 Annual Report includes 23 students employed in field for the 4-month Form Carpenter program and 29 students employed in field for the 4-month Rod Buster program for a total of 52 students to be included in the sample. The Commission is confused by the school’s statement that “[a]s of 8/6/2019 the population chart was missing information for 5 students” and that the school “was unable to retrieve the information from the former students to complete the verification.” The Commission reminds CTC that the school must be able to support student achievement rates through verifiable records and documentation of initial employment of its graduates (Section VII (B)/(1)(b), Substantive Standards, Standards of Accreditation) and that graduates should not be considered employed in field on the Annual Report if the school is unable to document initial employment.

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

a. For the 52 graduates listed as employed in field on the 2018 Annual Report, the following information:

<table>
<thead>
<tr>
<th>Graduate ID #</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Place of Employment, Address, &amp; Phone#</th>
<th>Employer Point of Contact</th>
<th>Date of Initial Employment</th>
<th>Descriptive Job Title</th>
</tr>
</thead>
</table>

b. The following supplementary information for the 52 graduates listed as employed in field on the 2018 Annual Report:
i. A copy of the school’s completed verification form for each graduate employed listed in (a.) above;

ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:

- The graduate’s name and contact information;
- An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
- An attestation that the graduate is earning training-related income; and
- In cases where licensure is required for employment, an attestation that such licensure has been achieved; and

iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.

c. An independent third-party review of the ACCSC 2018 Annual Report data following the ACCSC Guidelines for Independent Third-Party Employment Verification including the following chart completed for each program:

<table>
<thead>
<tr>
<th>Independent Third Party Initial Employment Verification</th>
<th>Program Title (Credential)</th>
<th>Length of Program (Months)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Report Year</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Total Number of Students Sampled</td>
<td>Total Number of Available Students to Sample*</td>
<td>Sample Size Percentage</td>
</tr>
</tbody>
</table>

| Verified as Correct | Verified but Different | Unable to Verify | Verified as Not Correct |

* Students classified as Graduates - Employed in Field in program

<table>
<thead>
<tr>
<th>Placements Verified by a Different Independent Third-Party*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name</td>
</tr>
</tbody>
</table>

* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”
d. The following chart with aggregate institutional results across all programs:

<table>
<thead>
<tr>
<th>Independent Third Party Initial Employment Verification</th>
<th>Reported Institutional Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Report Year</td>
<td>Name of Company</td>
</tr>
<tr>
<td>Total Number of Students Sampled</td>
<td>Total Number of Available Students to Sample*</td>
</tr>
<tr>
<td>Verified as Correct</td>
<td>Verified but Different</td>
</tr>
</tbody>
</table>

*Students classified as Graduates - Employed in Field across all programs for Annual Report year

<table>
<thead>
<tr>
<th>Placements Verified by a Different Independent Third-Party*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Company Name</td>
</tr>
</tbody>
</table>

* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”

e. If the school is unable to produce an independent third-party verification of graduate employment records from the 2018 Annual Report, then CTC must provide a clear explanation for why the school is unable to produce the report and a narrative for how the Commission can have a high level of reliance with the information and data provided in the 2018 Annual Report.

f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with accrediting standards regarding the school’s student services policy or practices.

8. CTC did not demonstrate that the school supports student achievement rates through verifiable records and documentation of initial employment of its graduates (Section VII (B)(1)(b), Substantive Standards, and Appendix VII, Standards of Accreditation). The on-site evaluation team had the following concerns related to initial employment policy and documentation:

- The school did not possess adequate documentation of graduates’ initial employment in accordance with requirements set forth in Appendix VII – Guidelines for Employment Classification, Standards of Accreditation;
- The school maintained an internal tracking database of verbal discussions with graduates or employers, and video testimonials provided by graduates, however, the records maintained in many cases failed to clearly provide information such as the graduate’s job title, duties, and start date;
- CTC was unable to explain how the school determined a graduate’s placement to be appropriately related to the field of training;
- The school often appeared to obtain verbal confirmation of employment from either the graduate or employer, but not from both parties as required; and
- CTC was unable to demonstrate that the school makes a diligent effort to obtain written verification of employment prior to accepting verbal confirmation.

In response to the on-site evaluation team’s concerns, CTC stated:
If CTC administrative staff had a better understanding or even an awareness of the detailed information required, then better efforts would have been made. Since reading the Standards of Accreditation, all required information is being collected for proper reporting, beginning with the next students to graduate from CTC, gaining employment. Written verification is now required from the employer. CTC will continue to perfect the process of written verification and utilizing third party verification.

While the Commission recognized the school’s efforts to correct the previously identified discrepancies with regard to initial employment verification, the Commission found that CTC’s lack of understanding is not a mitigating factor for the discrepancies. As such directed CTC to provide information on the ongoing process and the implementation of the new policy and procedures.

In response to the March 27, 2019 Warning letter, the school provided a chart of the graduates who gained employment between March 1, 2019 and May 31, 2019 but only provided a single completed verification form for [redacted]. It was unclear from the information provided whether the written documentation was completed by the graduate or employer as required by the Standards of Accreditation or if the school obtained verbal confirmation and completed the verification form. Therefore, the November 18, 2019 Warning letter directed the school to provide information on graduates who gained employment between June 1, 2019 and February 29, 2020 with supporting documentation.

In response to the November 18, 2019 Warning letter, CTC provided a chart with 14 graduates that listed 11 graduates with job titles, two (2) graduates as unemployed, and one (1) student with no status. In addition, the school provided forms for eight (8) of the 11 graduates with job titles. In reviewing the information included in the chart, the Commission questioned whether [redacted] placed as a “Truck Driver” is aligned with a majority of the educational and training objectives of the program; however, the school did not submit documentation for this student. The school stated:

See Exhibit 8B, verification forms that are currently available from two companies. Construction Training Center is still awaiting the verification forms from the other companies listed.

The Commission found the school’s response to be incomplete. The Commission reminds CTC that the school should not consider a graduate as having gained employment until the school is able to justify the classification of each graduate as employed in a training related field and maintain verifiable employment records (Appendix VII – Guidelines for Employment Classification).

Additionally, the school’s P&P Manual includes the following statement:

CTC maintains verifiable records of each graduate’s initial employment for five years. Any statement regarding the percentage of graduate employment, e.g., annual employment rates of graduates is based upon these verifiable records.

However, the P&P Manual does not include any details relating to how the school gathers and maintains the verifiable records of initial employment.

Overall, the Commission found that once again the school has not submitted sufficient information to demonstrate compliance with accrediting standards. Based on the foregoing, the Commission directs CTC to provide the following:

a. The school’s policies and procedure for initial employment verification;
b. A copy of the current verification form or other tools the school is currently utilizing to verify employment;

c. For each graduate who gained employment between June 1, 2019 thru August 30, 2020 provide the following information:

<table>
<thead>
<tr>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Employer, Contact, Address, &amp; Phone #</th>
<th>Date of Initial Employment</th>
<th>Descriptive Job Title</th>
</tr>
</thead>
</table>

<p>| | | | | | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
</table>


d. The following supplementary information:

i. The school’s completed verification form (as indicated in item (b) above) for each graduate employed listed in chart (c) above;

ii. For each graduate classified as self-employed, provide a signed statement from the graduate verifying that the employment is valid which includes the following:

- The graduate’s name and contact information;
- An attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received;
- An attestation that the graduate is earning training-related income; and
- In cases where licensure is required for employment, an attestation that such licensure has been achieved; and

iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provide by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school; and

d. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s standards.

9. CTC did not demonstrate that faculty and educational administrators engage in ongoing faculty assessment and professional development activities that are appropriate to the size and scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement. These professional development activities should include elements such as continuing education in the subject area(s) taught; teaching skill development; instructional methodology development; membership in trade and professional organizations as appropriate; and other elements appropriate for the ongoing professional development of faculty. The school is required to document the implementation of these professional development activities for its faculty (Section III (A)(2), Substantive Standards, Standards of Accreditation).

The on-site evaluation team found that CTC’s faculty personnel files included evidence of professional development activities in 2013, but that the school was unable to demonstrate that faculty members engaged in any ongoing training or development activities during the current cycle of accreditation. In response, the school stated that faculty members are required to “refer to the professional development section of the ACCSC website” and “complete at least one webinar on the ACCSC site per month and print out the certificate of completion for their personnel file.” However, the response does not include
any documentation to demonstrate implementation of the updated policy. Additionally, it is unclear how these professional development activities include specific elements for faculty as listed in the Standards of Accreditation.

The March 27, 2019 Warning letter directed the school to submit an explanation for how the policy ensures faculty and educational administrators complete professional development activities that are appropriate to the size and the scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement. In response, CTC stated that “all faculty are required to participate in the mandatory [Lunch and Learn] trainings.” Similar to the concern related to staff and the appropriateness of the lunch and learns with relation to supporting each individuals particular role in the school, it is not clear each lunch and learn activity is intended to support the quality of education provided; and enhance student learning and achievement. As such, the November 18, 2019 Continued Warning letter directed CTC to submit information for how the school’s policy ensures faculty and educational administrators complete appropriate professional development activities; a 2020 plan for each faculty member and educational administrator, and documentation for any completed activities.

In response to the November 18, 2019 Continued Warning letter, CTC submitted the identical response as for school management and administrative employees ongoing training and development. The Commission found that neither response includes the faculty members and as such does not show faculty ongoing professional development.

In response to how the school’s policy ensures faculty and educational administrators complete appropriate professional development activities, the school stated that:

Construction Training Center recognizes that our efforts to comply with a professional development plan suitable to ACCSC it must include courses that will provide support in each staff members particular roles. The following management and administrative employees have agreed to enroll and complete the suggested courses listed as a part of their professional development plan in 2020 at a minimum.

Construction Training Center has purchased a subscription to MaxKnowledge.com which allows each staff member to take professional development courses to enhance performance and knowledge in their area.

The Commission noted that the school’s response references management and administrative employees but does not speak to faculty.

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

a. An updated explanation for how the policy ensures faculty complete professional development activities that are appropriate to the size and scope of the school’s educational programs; support the quality of education provided; and enhance student learning and achievement;

b. A list of current faculty members and ongoing training and development activities to be completed in 2020 for each individual along with evidence for any activities completed; and

c. Any additional information that the school believes will be useful to the Commission in making a determination.

10. CTC did not demonstrate that the school’s student services program includes relevant coping skills (e.g., life, career development, budget, and personal financial planning skills) (Section VI (A)(3)(b)
Substantive Standards, Standards of Accreditation). The on-site evaluation team noted that CTC stated that the school does not have a program to assist students with budgeting, financial planning, or other life skills beyond academic and career assistance. In response to the TSR, the school stated that:

CTC maximized the sections in the NCCER curriculum that applied to life skill and career development. The two modules offered are Basic Communication Skills and Basic Employability Skills. While the two modules covered job applications, resumes, interviewing skills and problem solving skills, they fail to meet the requirements of ACCSC. After this was brought to our attention during the ACCSC visit, CTC immediately sought a solution to cover all areas to include budgeting, financial planning and relevant life skills after graduation. CTC 101 -Life Skills Seminar was created to cover Introduction to Student Loans, Personal Finance, Organization & Time Management and People Skills. CTC 102 - Career Development Skills Seminar was created to cover Resume Writing Skills, Filling Out The Job Application, Job Searching Skills, Interviewing Skills and Behavior On The Job. Both courses will be integrated in the Rod Buster and Form Carpentry programs. Each student will need to complete the required work which will be graded on a pass/fail basis along with the required contact hours.

While the Commission appreciated the school’s decision to incorporate modules within the curriculum to support a student’s educational experience, the purpose of student services is to ensure schools are attentive to students’ educational and other needs as a means to support student retention (Section IV, Statement of Purpose, Standards of Accreditation). Inclusion of modules does not clearly indicate how the school plans to provide assistance to students in these areas when the students are no longer in these courses. Specifically, the Commission questioned the availability of student services if life circumstances will impact the student’s educational success beyond the limited time in a specific course. In addition, it does not appear the student services program covers all areas as required by the Standards of Accreditation.

In response to the March 27, 2019 Warning letter, the school provided the updated Student Services policy which includes the areas of advising and counseling/academic advising; student records; official transcript; graduate and employment assistance; student graduate employment verification; student employment verification form; student complaints; sexual harassment; and resource, counseling, and assistance phone numbers. However, the documentation for the list of students for whom the school provided assistance during the April 1, 2019 and May 31, 2019 time period include four (4) students who signed a form indicating they had received assistance in Résumé Building which does not appear to be a service as listed in the policies and procedure manual. Therefore, the November 18, 2019 Continued Warning letter directed CTC to submit information on any updates to the school’s P&P Manual and a list of students for whom the school provided assistance with student services between June 1, 2019 and February 29, 2020 along with appropriate supporting documentation.

In response to the November 18, 2019 Continued Warning letter, CTC referenced the school’s updated Student Services policy which includes the headings: Advising and Counseling/Academic Advising; Student Records; Official Transcripts; Graduate and Employment Assistance; Student Complaints (I – IV); and Student Services V-Sexual Harassment. The Commission found that CTC included the accrediting standards rather than clear policies and procedures for these areas. In addition, the documentation for the three (3) students whom the school provided assistance with student services includes a transcript request, copy of a résumé, and Résumé Fill Out form for each student. The Commission questioned why CTC did not provide any documentation of student services for [redacted] who took an LOA for Transportation Issues as the P&P Manual references that the student services program will minimally encompass information on transportation. Additionally, based on the reported graduation rates on the 2019 Annual Report, the Commission is concerned that the school’s student
services are not ensuring CTC is attentive to the student’s educational and other needs as a means to support student retention.

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

a. If applicable, updated policies and procedure related to student services;
b. A list of students for whom the school provided assistance with student services between March 1, 2019 and August 30, 2020;
c. Appropriate documentation of the student services provided for any student listed in (b.) above; 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 regarding the school’s student services policy or practices.

11. CTC did not demonstrate that for every program there are detailed and organized instructional outlines and course syllabi showing a scope and sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies (Section II (A)(3)(a), Substantive Standards, Standards of Accreditation). In response to the on-site evaluation finding with regard to instructional outlines and course syllabi, CTC stated that “all course syllabi and instructor’s guides have been redone” to remove the “block of laboratory hours in the curriculum” and assigned lecture and laboratory hours to each course. In addition, the school noted that “[t]he new curriculum are being submitted [to] the South Carolina Commission of Higher Education for final approval.”

In reviewing the updated course syllabi and instructor’s guides included with the submission in response to the TSR, the Commission found that each syllabus refers to “credits” but lists the total contact/clock hours. As such, the Commission questioned whether the courses are awarded “credit hours” despite being approved as “clock hour” only programs with ACCSC. Additionally, each syllabus includes the following sentence “[t]he instructor reserves the right to adjust the lecture and laboratory times within the [total] hour time frame to suit personal teaching style, class learning style, class size and schedule.” Based on this sentence, it is unclear if the school is in fact providing the total number of contact/clock hours in the specific lecture and laboratory setting of instruction as listed on the syllabus. In addition, the course numbering does not appear to indicate sequencing or conform to generally accepted course numbering practices in higher education. For example, in the Rod Buster program, the Level 1 courses include a seven (7) digit number (i.e., 39101-05) higher than the Level 2 courses (i.e., 27204-01). Moreover, CTC indicated that “[s]tudents will follow the new curriculum” but did not provide any documentation demonstrating notification to students of the new curriculum.

In response to the March 27, 2019 Warning letter, CTC provided documentation of notification to students of the updated curriculum for all students “enrolling on or after April 15, 2019.” However, the school did not provide an explanation for whether all students will move to the new curriculum or documentation of implementation of the new curriculum. As such, the November 18, 2019 Continued Warning letter directed CTC to submit an explanation for which students will move to the new curriculum, the class schedule from January 1, 2020 to February 29, 2020, and transcripts for any graduate who enrolled after April 15, 2019.

In response to the November 18, 2019 Continued Warning letter, CTC stated that:

Because of the curriculum change that occurred in April 15, 2019, students who enrolled prior [emphasis added] to that date were allowed to complete the old program. Students enrolling
on or before April 15, 2019 [emphasis added] followed the new curriculum. The transition was simple do [sic] to the new curriculum adding courses. No courses were removed or substituted.

The school references the same group as completing the old program and the new curriculum. In addition, the Commission reviewed the transcript for the single graduate who enrolled after April 15, 2019 and noted the following:

- The student’s transcript lists “Clock Hours Earned” as 902.5 which is different from the approved 900 hours and
- The school’s permanent official transcript does not include the name and date/term of courses taken or the clock or credit hours and grades earned for each courses as per Section VI (B)(2), Substantive Standards, Standards of Accreditation.

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

a. Clarification on whether all students will be moving to the new curriculum as of April 15, 2019 or just those students who enroll after April 15, 2019;

b. An updated transcript that includes all the minimally required elements as listed in the Standards of Accreditation;

c. An explanation for why graduate’s transcript listed the completion of 902.5 hour; 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.

12. CTC did not demonstrate compliance with Program Advisory Committee (“PAC”) requirements in the areas outlined below:

- CTC must demonstrate that Program Advisory Committee review and comment activities include at least annual review and comment on student graduation and employment outcomes of each program (Section II (A)(6)(d)(ii), Substantive Standards, Standards of Accreditation). The TSR states that although CTC’s PAC meeting minutes reflect discussion of topics such as employability of graduates and market demand for labor in the construction industry, the meeting minutes do not reflect any discussion of the school’s reported graduation and employment rates.

- CTC must provide evidence that the school gives consideration to Program Advisory Committee input (Section II (A)(6)(e), Substantive Standards, Standards of Accreditation).

In response to the TSR, the school provided a copy of the January 1, 2019 PAC meeting minutes. In reviewing the submitted meeting minutes, the Commission found that the minutes include written and detailed description of all members in attendance; however, the meeting minutes reference as an “Education Regulator” but no further description or information on their attendance at the PAC meeting. Additionally, the PAC meeting minutes include suggestions from PAC members but no evidence of consideration for PAC input as required by the Standards of Accreditation. In addition, the outline for the second meeting per year, to be held June 25, 2019, indicates that a review of student achievement and learning resources will occur then. As such, the March 27, 2019 Warning letter directed CTC to provide a copy of the June 25, 2019 PAC meeting minutes along with an explanation of the Education Regulators in attendance, and evidence that the school gives consideration to PAC input.
In response to the March 27, 2019 Warning letter, the school provided a copy of the June 12, 2019 PAC meeting minutes; the policies and procedures for the PAC, and the IAIP as evidence the school gives consideration to PAC input. In reviewing the information provided, the Commission found that the PAC did not appear to review the length of the program; equipment; learning resource system; or specific student achievement rates. In addition, the school did not provide an explanation of the background for the “Education Regulators” who serve on the PAC. As such, the November 18, 2019 Continued Warning letter directed CTC to provide information on the appropriateness of the Education Regulators including their backgrounds, meeting minutes between January 1, 2019 and February 20, 2020 along with information to demonstrate compliance with Accrediting Standards.

In response to the November 18, 2019 Continued Warning letter, CTC submitted meeting minutes from PAC meetings held on January 1, 2019, June 12, 2019, and January 1, 2020. In reviewing the June 12, 2019 meeting minutes, the Commission found the PAC student graduation and graduate employment review and commentary included the following:

**Student Achievement**

- *that in good news, "we do not have any students currently or in the past who has been put on academic probation, which is a really good thing".*

- *stated that the NCCER curriculum usually doesn’t exceed a 10th grade level.*

- *is the NCCER testing policy still in affect because some of the test questions can be tricky? *yes, it is still NCCER policy and also a part of our own policy and procedure manual in section of student testing, that the students are allowed to retake any failed test with the permission of their instructor.*

**Student Graduate and Graduate Employment Rate**

- *i open this section with the graduation rate has dropped since adding the 900 clock hour programs which is the reason for "The Teach Out" method which will result in a decrease in hours that was mentioned earlier in the meeting presented by*  
  The graduate employment rate has decreased as well.

- *stated with the upcoming changes the employment rate should increase and the staffing company he is affiliated with (Skill Craft Staffing) is doing tent to permament hire. This should help with the increase in graduation rates with the students when once they apply.*

- *has reconnected with CTC and is a part of the Board of Directors.*

The Commission found that this discussion did not clearly indicate that the school utilizes the PAC as a means to provide the school with an external review of its program, in particular in the area of student graduation and graduate employment given the school’s rates are significantly below benchmark. In addition, although the meeting minutes include suggestions from the PAC, the school did not provide evidence that it gives consideration to the PAC input.

In relation to explanation for background of the Education Regulators and the appropriateness for their serving on the PAC, CTC stated that:

*CTC Education Regulator on the PAC are two of CTC alumni. They both had past experience in Construction, but they weren't certified, so they decided to attend school at CTC. Now both, are both NCCER certified. They were both chosen to serve on*
the PAC board because they were two great students that have years of experience in the construction field. (See Exhibit 12B, Education Regulators NCCER certification).

The Commission agrees that alumni with experience in the field are appropriate to serve on the PAC; however, the Commission continues to question how these individuals are serving in the role of “Education Regulator” given that their backgrounds do not appear to be in education or regulation.

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

a. Meeting minutes of all PAC meetings held for all programs between January 1, 2020 and September 15, 2020 clearly organized by program or program area and each set of minutes must include the following:
   i. A description of each member in attendance\(^\text{10}\) (i.e., titles and affiliations) and a notation as to which members in attendance represent the employment community or are practitioners;
   ii. The date, time, and location of each meeting;
   iii. A comprehensive and clear description of the review of and commentary made by the PAC members to demonstrate review of all items listed in Section II (A)(6)(d), Substantive Standards, Standards of Accreditation; and
   iv. Evidence the school gives consideration to PAC input;

b. An explanation for how the Education Regulators are able to provide input to the PAC on education or regulation;

c. The proposed dates for any additional PAC meetings; 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.

***

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in Section IV, Rules of Process and Procedure, Standards of Accreditation.

In accordance with Section X, Rules of Process and Procedure, Standards of Accreditation, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with Section X (C)(6), Rules of

\(^{10}\) Given COVID-19 restrictions, PAC meetings may be held in a virtual format.
Process and Procedure, Standards of Accreditation, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with Section VII (L)(7), Rules of Process and Procedure, Standards of Accreditation, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.

TEACH-OUT PLAN REQUIREMENT

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an ACCSC Institutional Teach-Out Plan Approval Form which must be submitted as part of the response for the items listed above.

MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

Based on Section VII (M), Rules of Process and Procedures, Standards of Accreditation and the school’s longest program of six (6) months, the maximum timeframe allowed for CTC to achieve and demonstrate compliance with the Standards of Accreditation is twelve months. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on June 10, 2021. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

Notification to Students

The school must inform current and prospective students in writing that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website (Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation).

RESPONSE REQUIREMENTS:

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

CTC must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.11 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.

11 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.
CTC must upload the school’s electronic response directly to ACCSC’s College 360 Database. The ACCSC College 360 database can be accessed by clicking here. Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found here. A detailed overview on how to upload a school submission can be found here.

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

The school’s response must also include a signed certification attesting to the accuracy of the information and be received in the Commission’s office on or before September 17, 2020. If a response, the required fee,\textsuperscript{12} and the certificate of attesting to the accuracy of the information is not received in the Commission’s office on or before September 17, 2020, 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,

Michael S. McComis, Ed.D.
Executive Director

c: [redacted]

Encl: ACCSC ACCSC Refund Report Summary Sheet
      ACCSC Refund Report Worksheet and Glossary

\textsuperscript{12} ACCSC assesses a $1,000 processing fee to a school placed on Probation.
### ACCSC REFUND REPORT SUMMARY SHEET

**School Name:**

**School Number:**

**Refund Report Date Range:**

<table>
<thead>
<tr>
<th>Student Name</th>
<th>Start Date</th>
<th>Last Date of Attendance</th>
<th>Date of Determination of Withdrawal / Termination</th>
<th>Refund Due Date</th>
<th>Date Refund Paid*</th>
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*This is the date that the refund was distributed to or received by either the student or applicable funding source.*
REFUND REPORT WORKSHEET

A separate worksheet must be completed for each refund made within the time period specified by the Commission.

Name of student: ___________________________ Date of enrollment: ___________________________

The maximum number of days for which the school must disburse refunds, as defined in the school’s refund policy: ___________________________

Based upon the school’s refund policy, select (a) or (b) below and enter the date the school used to calculate the number of days required to disburse the refund:

(a) Last date of attendance
(b) Date of determination of termination/withdrawal

Date of refund disbursement: ___________________________

The actual number of days between (a) or (b) above and the date the school disbursed the refund: ___________________________

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

<table>
<thead>
<tr>
<th>Length of program or period of enrollment:</th>
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<tbody>
<tr>
<td>Percentage of program or period of enrollment completed:</td>
</tr>
<tr>
<td>Total tuition for program or period of enrollment:</td>
</tr>
<tr>
<td>total amount of tuition collected:</td>
</tr>
<tr>
<td>percentage of total tuition collected:</td>
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<tr>
<td>percentage of collected tuition retained (c):</td>
</tr>
<tr>
<td>percentage of collected tuition refunded (d):</td>
</tr>
</tbody>
</table>

Amount of refund: $ ___________________________

Attach to the school’s submission:

☐ One copy of the school’s withdrawal/refund policy and attendance policy, as it appears in the school’s catalog, must accompany the school’s submission. If the school uses one or more state refund policies, please attach a copy of each state’s refund policy. One copy per state will suffice for the entire Refund Report.

☐ The Refund Report Summary Sheet for all refunds included in this report.

Attach to this worksheet:

☐ Copy of the calculation sheet(s) showing how the refund was calculated.

☐ Copy of the front and the back of the refund check(s) or electronic transmission document(s).
THE REFUND REPORT WORKSHEET GLOSSARY

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

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

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

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

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

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

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

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

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

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

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

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

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