

March 12, 2020

ELECTRONIC DELIVERY

██████████
██████████
Western Truck School
2742 Industrial Boulevard
West Sacramento, California 95691

School #M072253
Probation

Dear ██████████

At the February 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Western Truck School (“WTS”) located in West Sacramento, California on Warning. Upon review of the September 20, 2019 Warning letter and the school’s response, the Commission voted to place WTS on **Probation** with a subsequent review scheduled for ACCSC’s August 2020 meeting. The history of the Commission’s review, reasons for the Commission’s decision, and the requirements for the school to demonstrate compliance are set forth below.

History of the Commission’s Review

- At the May 2015 meeting, the Commission granted WTS renewal of accreditation with reporting for four (4) years going forward from November 2014. The Commission determined that the school must submit a Financial Report demonstrating the financial structure of the school is in an ongoing manner sound with resources sufficient for the proper operation of the school and discharge of obligations to students.
- At the May 2016 meeting, the Commission considered an Application for a Change of Location Part I. Because WTS moved its location without obtaining Commission approval prior to the move, the Commission reminded WTS that the school must submit an application **prior** to the intended move date and assessed a late fee to the school.
- At the February 2017 meeting, the Commission determined that WTS met the requirements for a change of location and the addition of a satellite location (SL#460498). The Commission included an Institutional Enhancement Enclosure directing WTS continued attention toward ensuring the school applies a fair and equitable refund policy, ensuring that personnel whose primary responsibilities include admissions activities are not involved in admissions decisions, and ensuring that administrative and operational policies are consistently applied.
- At the August 2017 meeting, the Commission considered the Application for a Change of Location-Part I & Part II submitted by WTS for its satellite location (SL#460498) as well as information that the satellite location changed location **without prior** notification or approval from the Commission. Upon review of the school’s application, the Commission considered the circumstances and approved the school’s application. The Commission included an Institutional Enhancement Enclosure directing WTS’ continued attention toward ensuring that the school monitors when appropriate applications and reports need to be filed and ensures that applications and reports submitted to the Commission are complete, accurate, signed by the school’s chief executive officer and filed in a timely manner.
- At the August 2018 Commission Meeting the Commission considered that on April 12, 2018 WTS **again moved its location without prior application and approval**. The Commission voted to place WTS on **Warning** and direct the on-site evaluation team scheduled to review the school’s Application for Renewal of Accreditation to evaluate the school’s on-going compliance with accrediting standards,

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

- At the August 2019 Commission meeting, the Commission considered its previous decision to place WTS on Warning and to refer the matter to the on-site evaluation conducted for the Applications for Renewal of Accreditation and Change of Location. Upon review of the April 23, 2019 Team Summary Report and the school’s response, the Commission voted to **Continue WTS on Warning**.

February 2020 Commission Review

1. WTS must demonstrate that the school has full-time on-site supervision by an individual or team with the appropriate combination of education, experience, and demonstrated ability to lead and manage a post-secondary educational institution in compliance with accrediting standards and that owners, board members, members of school management, and administrative employees are qualified for their particular roles and who possess the appropriate education, training, and experience commensurate with the level of their responsibilities (*Section I (A)(1)(a)&(b), Substantive Standards, Standards of Accreditation*). As stated in the September 20, 2019 Warning letter, the Commission directed WTS to submit (1) an organizational chart including names and titles for all staff at the school; (2) position descriptions and Staff Personnel Reports for all management-level staff; (3) an update on the school’s initiatives to support and enhance the management of the school; and (4) documentation showing the completion of any and all development and training activities completed.

The Commission noted that WTS’s response to the Warning letter does not include the required information under items (2), (3), and (4) as outlined above. Specifically, while the school’s response includes an organizational chart, WTS did not provide any position descriptions for management-level staff. The school only provided Staff Personnel Reports (SPRs) for two “new” hires, the [REDACTED]. Upon review of the SPR for [REDACTED], the Commission noted that the form does not include any information under the Educational Administration, Management, and Leadership Education and Training section, a core area of focus for the Commission as articulated in the Warning letter.

For [REDACTED], the school submitted a SPR indicating her responsibilities include serving as [REDACTED].¹ The Commission noted that the SPR for [REDACTED] does not include any information under the sections for Postsecondary Educational Background, or Educational Administration, Management, Leadership Education and Training. Of more significant concern to the Commission is that according to the SPR for [REDACTED], [REDACTED] prior work experience is limited to serving as an instructor at WTS, which does not demonstrate that [REDACTED] minimum of three years of related practical work experience in the subject area taught (*Section III (B)(6), Substantive Standards, Standards of Accreditation*). The information submitted also shows that [REDACTED] no professional development instructor training since [REDACTED] (*Section III (B)(4), Substantive Standards, Standards of Accreditation*). Further, in lieu of the required submission of a SPR for the school’s [REDACTED] [REDACTED] as the Commission directed in the September 20, 2019 Warning letter, the school provided only a summary of the background and experience of each individual.

¹ In future submissions, please submit a Faculty Personnel Report for this individual.

The Commission also noted that the school's response does not include any information and makes no mention of any of the strategic initiatives to support and enhance and management of the school as summarized in the September 20, 2019 Warning letter, including the school's effort to find a qualified consultant to assist with compliance, the hiring of dedicated placement staff, or the continued emphasis on management planning and development. Additionally, the school's response does not include any documentation of completed professional development and training activities for administrative staff. Rather, the school's response simply states "completed staff awareness and training," "pending," or "in process" in regard to these types of initiatives.

As stated in the September 20, 2019 Warning letter, the Commission expressed concern and questioned several key compliance areas which has further caused the Commission to question whether the school's management has the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards. The Warning letter also stated that, "the Commission's next assessment of the school's ability to manage a postsecondary educational institution in compliance with accrediting standards will be based on the school's response to the items of the Warning." As summarized above, the Commission found the school's response to the management and administrative capacity questions to be lacking. The Commission further found that outstanding questions remain regarding the school's compliance with accrediting standards in the areas of institutional assessment and improvement, Program Advisory Committees, successful student achievement, and the disclosure of accurate student achievement data.

As stated in the *Standards of Accreditation*, schools seeking accreditation agree to support the accreditation process and that the responsibility rests with the school to demonstrate continuous eligibility for accreditation and compliance with accrediting standards and requirements as set forth in the *Standards of Accreditation* throughout the application and accreditation period. While the Commission employs its own fact-finding methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish it is meeting all requirements of the *Standards of Accreditation*. Moreover, the Commission's deliberations and decisions are made on the basis of the written record of an accreditation review. Schools do not have the right to appear before the Commission. Accordingly, a school must supply the Commission with complete documentation of the school's compliance with all accrediting standards and requirements if the school is to be granted accreditation (*Preamble, Introduction; Section I (D)&(E), Rules of Process and Procedures; Standards of Accreditation*).

The Commission reminds WTS that the applications, reports, forms, and instructions are considered part of the *Standards of Accreditation* and are critical to the Commission's ability to determine compliance with accrediting standards. A school is responsible through these applications, reports, forms, and instructions for demonstrating continuing compliance with accrediting standard and for ensuring that applicable instructions are followed. Applications, reports, and forms submitted for Commission review must be complete, accurate, signed by the school's chief executive officer, and filed in a timely manner.

Based on the foregoing, the Commission directs the school to submit a more fulsome response regarding the management and administration of the school, with supporting documentation as warranted, in the following areas:

- a. A current organizational chart to include the names and titles of management and administrative staff;

- b. A job description and a completed Staff Personnel Report – or a Faculty Personnel Report if the individual’s responsibilities include teaching at least 50% of the time – for each manager and administrative staff member captured on the organization chart;
 - c. An explanation as to how each individual captured on the organization chart is qualified to fulfill his/her role with the school;
 - d. An update on the school’s initiatives, including: seeking a qualified consultant, the hiring of dedicated placement staff, and the school’s continued emphasis on management planning and development of the communications of school organizational objectives;
 - e. A description of professional development undertaken by the management team to deepen understanding of the accrediting standards and documentation of such activities; 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 ACCSC’s requirements regarding the school’s management and administrative capacity.
2. WTS must demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provided education (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*) and must demonstrate that the school supports reported rates of student graduation and graduate employment through student transcripts, the school’s verifiable records of initial employment of its graduates, or other verifiable documentation (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation and Appendix VII Guidelines for Employment Classification*).

Overall, the Commission found the school’s response to this matter to be confusing, disorganized, and incomplete. As an initial matter, with regard to the Graduation and Employment Chart submitted by WTS, the school failed to provide information on the program title, program length in months, or the required Report Date. The chart also includes handwritten edits to the data reported in the categories included on the chart rendering the results unclear. Further, the Commission noted that the school’s Placement Report also includes handwritten edits and mark-ups to the data reported that are not explained.

As a result of the school’s confusing and incomplete submission, the Commission found that the school did not provide data and information that can be relied upon in order to determine the school’s compliance with student achievement benchmarks.² Accordingly, the Commission directs the school to submit the following:

- a. A Graduation and Employment Chart for both the Class A Commercial Driver program and the Class A Advanced Commercial Driver program using a **May 2020 Report Date**.
- b. For **each** Graduation and Employment Chart, provide:
 - i. The following information for every student categorized as a “start” on line 2:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1					

² The burden rests with the school to establish that it is meeting the standards. A school must supply the Commission with complete, truthful, and accurate information and documentation showing the school’s compliance with all accrediting standards if the school is to be granted and maintain accreditation (*Section I (G), Rules of Process and Procedure, Standards of Accreditation*).

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

Count	Student ID	Program	Start Date	Reason Unavailable	Description of the Documentation on File
1					

- iii. Supporting and verifiable documentation for each student in (ii.) above to include minimally, external documentation such as military orders, letter from physician/doctor, death notice/obituary, public record of incarceration.

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

Count	Graduate ID	Program	Start Date	Employer, Contact, Address, & Ph. #	Date of Initial Employment	Descriptive Job Title & Responsibilities	Source of Verification ⁴ (i.e., graduate or employer)
1							

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

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

- vii. Supporting and verifiable written documentation for each graduate in (vi.) above to include a signed statement from the graduate with the graduate’s name and contact information; an attestation that the self-employment is aligned with the individual’s employment goals, is vocational, 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.

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

Count	Graduate ID	Program	Start Date	Description of the Documentation on File
1				

- ix. Supporting and verifiable documentation for each graduate in (viii.) above to include written documentation from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school.

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

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason
1					

- xi. Supporting and verifiable documentation for any graduate classified in (x) to include, minimally, external documentation such as transcripts/enrollment agreements for “Graduates-

³ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

⁴ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

- Further Education” and military orders, letter from physician/doctor, death notice/obituary, public record of incarceration, etc. for “Graduates-Unavailable for Employment.”
- c. If either the reported graduation rate or employment rate for the Class A Commercial Driver program or the Class A Advanced Commercial Driver program fall below student achievement benchmark, provide a copy of the school’s student achievement improvement plan which addresses 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.
 - d. Minutes from the school’s Commercial Driving Program Advisory Committee (“PAC”) meetings hosted in 2020 that include the date, time, and location of each meeting; a comprehensive and clear description of the review of and commentary made by each of the school’s PAC; the review and commentary regarding student achievement outcomes; and the school’s consideration of PAC input.
 - e. A copy of the school’s process and procedures for classifying and verifying graduate employment.
 - f. A copy of the current verification form or other tools the school is currently utilizing to verify employment as part of the above process and procedures.
 - 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.
3. WTS must demonstrate that the school engages in ongoing institutional assessment and improvement activities and planning appropriate to the size and scale of the school’s operations and that support the management and administration of the school as well as the quality of education provided. WTS must also show that institutional assessment and improvement planning activities represent an ongoing experiences at the school (*Section I (B)(1)&(2), Substantive Standards, Standards of Accreditation*). WTS provided a copy of its 2020 IAIP that was last updated on December 31, 2019. The Commission noted that this plan is largely backwards looking as it merely summarizes the school’s strategic initiatives and activities from 2017 to 2019. In terms of future goals and plan, the Commission noted that that there were no goals or institutional assessment and improvement planning activities identified beyond February 2020, which the Commission found to be insufficient.

Accordingly, the Commission directs WTS to submit the following:

- a. Evidence of institutional assessment and improvement activities and planning appropriate to the size and scale of the school’s operations and that support the management and administration of the school as well as the quality of education provided⁵;

⁵ Areas to consider should include management; fiscal condition and budget; administrative policies and practices; emergency preparedness; student support services; faculty and staff development; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes.

- b. Documentation showing the implementation activities that took place from December 1, 2019 through May 31, 2020 in any of the areas described in *Section I (B)(1), Substantive Standards, Standards of Accreditation*; 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.
4. WTS must demonstrate that the school discloses the graduation and graduate employment rate for each program as last reported to the Commission that includes the program population base and time frame upon which each rate is based (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). The Commission found that the school's response includes a School Performance Fact Sheet, which includes on-time completion rates and employment rates for 2017 and 2018. However, the disclosure does not appear to disclose the graduation and employment rates last reported to ACCSC as required by accrediting standards. Given that WTS reported the most recent student achievement data to ACCSC in its 2019 ACCSC Annual Report, the Commission directs the school to submit the following:
- a. A description of the school's system for disclosing the graduate and employment rates as last reported to the Commission, and
 - b. A copy of the school's current disclosures of the graduation and graduate employment rate for each program as last reported to the Commission in the 2019 ACCSC Annual Report that includes the program population base and time frame upon which each rate is based.⁶

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 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.

⁶ For example, screenshots/hyperlinks to the school's website showing the disclosures or disclosure sheets provided to students prior to enrollment.

In accordance with *Section VII (L)(8), 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 where additional information regarding that action can be obtained from the Commission's website.⁷

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 months, the maximum timeframe allowed for WTS 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 **March 12, 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.

RESPONSE REQUIREMENTS:

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

WTS must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.⁸ If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

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

⁷ <http://www.accsc.org/Commission-Actions/Accredited-Schools-on-Probation.aspx>

⁸ 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.

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 July 2, 2020**. If a response, the required fee,⁹ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before July 2, 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]
[REDACTED]

Sincerely,

[REDACTED]
Executive Director

⁹ ACCSC assesses a \$1,000 processing fee to a school placed on Probation. The school will receive an invoice separately.