

March 10, 2020

**ELECTRONIC DELIVERY**

[REDACTED]  
[REDACTED]  
Caribbean Forensic & Technical College  
Avenue Ponce de Leon #1207  
San Juan, Puerto Rico 00907

*School #M070402*  
*Continued Warning*

Dear [REDACTED]

At the December 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place Caribbean Forensic & Technical College (“CFTC”) located in San Juan, Puerto Rico on Warning. Upon review of the June 26, 2019 ACCSC letter and the school’s response, the Commission voted to continue CFTC on **Warning**. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

**History of the Commission Review:**

The Commission took note of the following history regarding CFTC’s verification of graduate employment:

- At the August 2016 meeting, the Commission voted to grant CFTC renewal of accreditation and placed the school on Employment Verification Reporting. In response to the March 31, 2016 Team Summary Report, CFTC did not provide the documentation that the school relied upon to classify the graduates as “Employed in Field” and a justification on how the school’s reported data could be considered “reliable” as requested by the Commission. As such, the Commission voted to place the school on Employment Verification Reporting in order to monitor the effectiveness of the school’s policies and procedures for employment verification.
- At the February 2017 meeting, the Commission voted to continue CFTC on Employment Verification Reporting. Although the September 7, 2016 Commission letter directed CFTC to submit a copy of the school’s completed employment verification form for the employed graduates, the school only provided a blank copy of its Employment Form and not completed forms for the eight employed students listed by the school. The Commission also found that the school’s description of the process and procedures for recording and verifying graduate employment was limited.
- At the August 2017 meeting, the Commission voted to defer final action on CFTC’s Employment Verification Report. In the April 4, 2017 letter, the Commission directed CFTC to submit a description of the school’s process and procedures for recording and verifying graduate employment along with a copy of the verification form or other tool the school utilizes to verify employment. The Commission also directed the school to submit employment verification information and documentation for students who gained employment in the career field for which the school provided education between April 1, 2017 and June 30, 2017. In its response, CFTC submitted only a list of seven students who gained employment in the career field without any employment verification documentation or a narrative regarding the school’s process and procedures for recording and verifying graduate employment. Therefore, the Commission found that CFTC did not provide documentation to demonstrate that the school verifies initial employment of graduates.
- At the August 2018 meeting, the Commission voted to again continue CFTC on Employment Verification Reporting. The Commission found that the school’s process and procedures for recording and verifying graduate employment did not include information regarding career advancement. In addition, in reviewing the employment verification forms, the Commission noted that the school

reported one Forensic Fingerprint & Photo. Specialist (Certificate) program graduate as employed as an Encargada Cocina, or Kitchen Manager; however, the form indicated that the employment was not related to the field of study. The Commission also questioned how another graduate listed as a Compras (translated to Purchases) for [REDACTED] which appears to be a bread manufacturer and distributor, was employed in the Forensic Fingerprint & Photo Specialist field.

- At the May 2019 meeting, the Commission voted to place CFTC on Warning. In response to the October 25, 2018 ACCSC letter, the school did not provide a description or a copy of the school's process and procedures for recording and verifying graduate employment as requested. In addition, the Commission directed the school to submit documentation for graduates identified as employed in the career field for which the school provided education between November 1, 2018 and January 31, 2019. While it appears that most of the six students listed in the response fall under career advancement, the Commission found that the employment verification forms submitted by the school did not contain written documentation for career advancement. Furthermore, the Commission questioned whether the employment classification for three graduates was appropriate and reasonable based on the educational objectives of the program and if employment was directly related to the program from which the individuals graduated.

#### **December 2019 Commission Meeting:**

The Commission requires CFTC to demonstrate that ACCSC can place a high level of reliance upon information, data, and statements provided by the school through supplying verifiable records of each graduate's initial employment (*Preamble, Introduction, Rules of Process and Procedure; Section VI (C)(2), Substantive Standards, Standards of Accreditation*). The school must support its reported rates of graduate employment by maintaining verifiable records of initial employment (*Section VI (C)(2) and Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*).

In the June 26, 2019 letter, the Commission again directed CFTC to submit a description of the school's process and procedures for recording and verifying graduate employment. The school's response includes the following statements:

*CFTC maintain and monitor the placement rate by 70% or more of graduates. Should interview students to orient them about the world of work in their area of study [sic].*

*The institution submit required employment reports. Caribbean Forensic & Technical College Employment Orientation Officer document the work that students are employed after graduation [sic].*

CFTC also stated that the school documents employment through an "Employment Form" which "should also indicate whether the work is related to their area of study" and maintains the files in the student's Academic Record. For self-employment, the graduate must specify the name of the corporation and the graduate's name as the "immediate boss." Finally, the policy states that "the school follow[s] up for verification of employment of students employed in field."

In its December 2019 review, the Commission, however, found CFTC's process and procedures for recording and verifying graduate employment to be insufficient. For example, the self-employment policy does not include the attestation language included in ACCSC's *Guidelines for Employment Classification*. In addition, despite reporting a significant number of graduates in the category of "Career Advancement," CFTC did not include a policy or process as to how the school document graduates who fall into this category. Furthermore, the school did not explain how or when the follow-up verification occurs.

In the June 26, 2019 letter, the Commission directed CFTC to provide employment documentation for graduates employed in the career field for which the school provided education between July 1, 2019 and September 30, 2019. In response, the school provided information for four employed graduates, including two students who gained initial employment earlier in 2019. In its December 2019 review, the Commission again found that the school did not provide career advancement documentation for two graduates – [REDACTED]

In the April 4, 2017, May 3, 2018, October 25, 2018, and June 26, 2019 letters, the Commission reminded CFTC that per ACCSC’s *Guidelines for Employment Classification*, students that are already employed in the field of study at the time of graduation<sup>1</sup> can be considered employed when completing the program of study only when the school shows with written documentation from the employer or the graduate 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 (*Appendix VII – Guidelines for Employment Classification, Standards of Accreditation*). Despite numerous opportunities to update or create policies surrounding career advancement and provide documentation of career advancement, the Commission found that the school continues to fail to document graduates who fall into this category. Additionally, the Commission noted that the school did not include an employer address or employer contact person/supervisor for [REDACTED] employment as an [REDACTED] [REDACTED] directly relates to the Private Detective program or aligns with a majority of the educational and training objectives of the program.

As noted in the June 26, 2019 ACCSC letter, the Commission first placed CFTC on Employment Verification at the August 2016 meeting. In the over three years since that time through five subsequent reviews of CFTC’s employment verification information, ACCSC found that the school has continuously failed to demonstrate a high level of reliance upon information, data, and statements provided by the school through supplying verifiable records of each graduate’s initial employment. The school does not appear to have any policy or the ability to document graduates classified as career advancement despite this being a critical part of the Commission’s actions to continue CFTC on Employment Verification Reporting and place the school on Warning. The Commission noted that the school recently underwent a Change of Control and is hopeful that new ownership can enact policies and procedures to document initial employment.

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

- a. An updated description of the school’s process and procedures for recording and verifying graduate employment;
- b. The school’s current verification form or other tool the school utilizes to verify employment (the policy and verification form must also include information for graduates reported in the career advancement category);
- c. For each graduate that the school has identified as employed in the career for field for which the school provided education from February 1, 2020 to April 30, 2020, submit the following information:

Count	Graduate ID#	Program	Graduation Date	Employer, Contact, Address & Phone #	Date of Initial Employment*	Descriptive Job Title
1	1234XXCV	HVAC Technician	[REDACTED]	[REDACTED]	[REDACTED]	HVAC Technician

<sup>1</sup> The intent of this provision does not apply in cases where a student secures employment toward the end of the program but prior to graduation, where the employment is based on the near anticipated completion of the program (e.g., externship to hire prior to graduation).

				██████████ ██████████ ██████████		
2	1235XXCB	HVAC Technician	██████████	██████████ ██████████ ██████████	██████████	HVAC Technician

\* For students already employed in the field of study at the time of graduation, the school must provide documentation required in item (iv.) below.

- d. The following supplementary information for each graduate identified in chart (c.) above:
- i. A copy of the school’s completed verification form (as indicated in item (b.) above) for each graduate employed in field;
  - ii. Supporting and verifiable documentation or a narrative justification for each graduate in b. above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study;
  - iii. 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
  - iv. 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
- e. Any additional information the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s employment verification requirements.

**Warning Restrictions:**

Pursuant to *Section VII (K)(7), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

**Notification to Students:**

The Commission requires the school to inform current and prospective students<sup>2</sup> in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

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<sup>2</sup> A prospective student is an individual who has contacted the school requesting information concerning admission to that institution.

**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.

CFTC 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.<sup>3</sup> 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.

CFTC 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 include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before May 15, 2020**. If a response, the required fee,<sup>4</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before May 15, 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,

[REDACTED]  
Michale S. McComis, Ed.D.  
Executive Director

<sup>3</sup> 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](http://www.accsc.org).

<sup>4</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.