



Accrediting Commission of Career Schools and Colleges

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[www.accsc.org](http://www.accsc.org)

October 21, 2020

**ELECTRONIC DELIVERY**

██████████  
██████████  
Central California School of Continuing Education  
139 North 5<sup>th</sup> Street  
Coalinga, California 93210

*School #B072603*  
*Warning*

Dear ██████████

At the August 2020 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation and Branch Verification Report submitted by Central California School of Continuing Education (“CCSCE”) located in Coalinga, California. Upon review of the March 6, 2020 On-site Evaluation Report (“OER”) and the school’s response to that report, the Commission voted to place CCSCE on **Warning** with a subsequent review scheduled for ACCSC’s February 2021 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

**RENEWAL OF ACCREDITATION / BRANCH VERIFICATION**

1. CCSCE must demonstrate that the school has a sufficient number of managers and administrative employees necessary to support the school’s operations and student services (*Section I (A)(I)(c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that prospective students were required to travel close to 100 miles to complete parts of the admissions and financial aid processes, that the placement coordinator did not have on-campus hours in Coalinga, and that externships were completed close to 70 miles from the school. Finally, the team noted student dissatisfaction with student services (26%) and the school’s facility (24%). In response to the March 6, 2020 OER, CCSCE stated that the registration process was now completed at the branch location, that the majority of students lived near the placement coordinator, and that the school worked to find externship sites close to where students live. CCSCE also submitted names and locations of where students live and how far away from Coalinga they live along with the results of a re-survey, showing positive regard for facilities student services. While the Commission took into account the school’s response, the Commission found that the lack of a placement coordinator at the Coalinga campus continues to be an issue since 33% (15 out of 45) of the listed students appear to live within 20 miles of the Coalinga campus. Moreover, the resurvey shows 20% student dissatisfaction with student services. These issues taken together created doubt as to whether the school as a sufficient number of managers and administrative employees at the Coalinga campus as well as sufficient student services.

In order to provide CCSCE with an additional opportunity to show that the school maintains a sufficient number of managers and administrative employees, the Commission decided that additional monitoring was required. Accordingly, the Commission directs CCSCE to submit the following:

- a. An organizational chart of all on-campus administrative and management staff for the Coalinga Campus;
- b. A list of all student services and a description as to how these services are readily available to students; and
- c. A survey of all students regarding current student satisfaction with the school’s available support services using the ACCSC Survey tool or one that is substantially similar.

2. CCSCE must demonstrate that the school delivers programs as approved by ACCSC and as represented in the school's catalog and that these programs include the appropriate number of didactic hours, and as applicable, the appropriate number of supervised laboratory and/or other hours (e.g., outside work/preparation, externship, etc.) necessary to achieve the program objectives (*Section II (A)(2)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the maximum hours scheduled for a student ( [REDACTED] ) appeared to fall below the required number of hours for a program and that student records showed inconsistencies in attendance tracking. In response to the March 6, 2020 OER, CCSCE stated that the school had not cancelled any classes during the past two years in questions and that [REDACTED] had met attendance and GPA requirements. CCSCE additionally provided [REDACTED] transcript and a copy of the school's attendance sign in sheets with externship noted. In reviewing [REDACTED] transcript, the Commission found that the transcript did not show [REDACTED] schedule and attendance. Similarly, the school submitted Diagnostic Medical Ultrasound Program sign-in sheet which alone is insufficient to verify attendance records against the official record and as such CCSCE failed to show that the school delivers the programs as approved by ACCSC and represented in the school's catalog.

In order to give CCSCE an additional opportunity to document its delivery of its programs in accordance with accrediting standards, the Commission determined that additional information was required. Accordingly, the Commission directs CCSCE to submit sign in sheets and the official attendance record for the Diagnostic Medical Ultrasound Program for 2 months showing the reliability and consistency of the course hours offered by the school and the student attendance records.

3. CCSCE must demonstrate that all course and program design and credit awards conform to generally accepted practices in higher education (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted the following:
  - That an instructor was teaching two courses simultaneously (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*);
  - That students were permitted to acquire graded hours up to 150% of the program as additional practice (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*);
  - The Diagnostic Medical Ultrasound program included one course (Ultrasound Clinical Scanning & Lab) at 21.5 credit hours and 400 supervised lab hours (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*);
  - The Diagnostic Medical Ultrasound program course titled, "Medical Assisting Health Care Education was similarly constructed with the course being comprised of 20.5 quarter credit hours, 400 clock hours, and 10 externship clock hours (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*);
  - Questions about the consistency and fairness of the criteria regarding externships in the Medical Assisting Health Care Education course (*Section II (A)(3)(a), Substantive Standards, Standards of Accreditation*);
  - The team questioned the appearance that academic progress is not reported to students at regular intervals in the Medical Assisting Health Care Education course (*Section VII (A)(2)(c), Substantive Standards, Standards of Accreditation*); and

- The lack of signed contracts and with and evaluation practices of current externship sites for the Medical Assisting Health Care Education course (*Section II (A)(8)(b), Substantive Standards, Standards of Accreditation*).

In response to the March 6, 2020 Commission letter, CCSCE noted the use of an additional instructor to teach newly enrolled students and new procedure to ensure that students graduate on the end date of their enrollment agreement and submitted a copy of the front page of an enrollment agreement and transcript. CCSCE further submitted a copy of the Outline of a Non-degree program for the Ultrasound Clinical Scanning & Lab Course along with a description of how the course is taught. CCSCE explained that the Medical Assisting Health Care Education module covered many subjects and includes lab and didactic training as well as the 180 hour externship. To support this description, the school submitted a program outline, week's sample of the module, a copy of a graduate's transcript, a copy of a current student's progress report, and a sample student completed skill sheet. CCSCE noted that while students get a final grade for the module, students receive monthly progress reports. CCSCE further noted that the school had created an externship plan and monitoring and evaluation sheets as well as signed contracts with externship sites and provided documentation of the contract, evaluation, and monitoring sheets.

In reviewing the school's response, the Commission found the course design of the Ultrasound Clinical Scanning & Lab Course and of the Medical Assisting Healthcare Education Course do not appear to conform to generally accepted practices in higher education as the subject variance within the course and the amount of credit hours awarded are higher than generally accepted practices (i.e., the Ultrasound Scanning & Lab Course is 21.5 credit hours and the Medical Assisting Healthcare Education Course is 20.5 credit hours) such that the course design do not allow the school to measure student performance on discrete knowledge and skill sets. Additionally, while the Commission noted that the submitted progress reports, the Commission is interested in confirming that the progress reports are consistently used.

In order to give CCSCE an opportunity to demonstrate that its course and program design conform with generally accepted practices in higher education and that students receive reporting on academic progress at regular intervals, the Commission decided that additional information was required. Accordingly, the Commission directs CCSCE to submit the following:

- a. A [Program Modification Report Nonsubstantive Modification](#) for the Diagnostic Medical Ultrasound program showing that the Ultrasound Clinical Scanning & Lab Course and Medical Assistant Healthcare Education module shows conformance with generally accepted practices in higher education through separation of discrete topics into distinct courses and
  - b. A copy of 5 recent graduates' progress reports and their transcripts showing consistent reporting on academic progress in the Medical Assistant Health Care Education and Ultrasound Clinical Scanning modules.
4. CCSCE must demonstrate that the school maintains written and detailed minutes of each meeting to include a comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee ("PAC") members (*Section II (A)(6)(c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the reviewed minutes did not demonstrate a review of and commentary made by PAC members. In response to the March 6, 2020 OER, CCSCE stated that PAC minutes include commentary notations made by the PAC and submitted a copy of PAC meeting minutes from its December 2019 meeting. In reviewing

the submitted minutes, the Commission found that while there was some attribution and commentary by individual members, the attributions were not consistent throughout the minutes and there was not sufficient detail to determine whether all topics were covered. In order to give CCSCE an additional opportunity to show that its PAC meetings and minutes meet ACCSC standards, the Commission determined that additional monitoring was required. Accordingly, the Commission directs CCSCE to submit minutes from at least one PAC meeting for each program area hosted in 2020 that each include:

- a. The date, time, and location of each meeting ;
  - b. A comprehensive and clear description of the review of and commentary made by each of the school’s PACs;
  - c. The PAC’s review and commentary regarding student achievement outcomes, learning resources, the adequacy of facilities and equipment; and
  - d. The school’s consideration of PAC input.
5. CCSCE must demonstrate that employment classifications are verified by the school and verifiable by third parties in accordance with (*Section VII (B)(1)(b), Appendix VII, Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school’s primary verification method was verbal but that there was no evidence that diligent efforts were made to secure written employment verification from employers or graduates. In response to the March 6, 2020 OER, CCSCE stated that all employment verifications were now signed by either the employer or student and provided a sample copy of an employment verification form. While the Commission noted the provided example, the Commission found that the form lacks a signing date and description of a job title.

In order to give CCSCE an additional opportunity to show that the school’s employment verification form contains sufficient information and that the school verifies employment in accordance with accrediting standards, the Commission decided that additional information was required. Accordingly, the Commission directs CCSCE to submit the following:

- a. For each graduate who gained employment in the career field for which the school provided education from June 1, 2020 to November 30, 2020, provide the following information:

Count	Student ID	Program	Graduation Date	Employer, Contact, Address & Phone #	Date of Initial Employment	Descriptive Job Title
1	12345	HVAC Technician	01/10/2018	HVAC Repair Industries, John Doe, 123 Sample Way, Anywhere, MD 222.333.1234	2/1/2018	HVAC Technician
2	23456	HVAC Technician	01/10/2018	AC Service, Jane Smith, 456 Maple Dr. Somewhere, VA 333.444.5678	3/1/2018	HVAC Technician

and

- b. Supplementary information for each graduate identified in chart (a.) above as follows:
  - i. A copy of the school’s completed verification form for each graduate employed;
  - ii. For each graduate classified as self-employed, 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,” 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 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.
6. CCSCE 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 (*Section I (B)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the provided an Institutional Assessment and Improvement Plan (“IAIP”), but that this plan did not include detailed benchmarks or contain future goals. In response to the March 6, 2020 OER, CCSCE stated that its current IAIP, completed after the on-site evaluation, had benchmarks and future goals and submitted the current IAIP. In reviewing the submitted IAIP, the Commission noted that throughout the IAIP, objectives are written as statements of fact (for example, the objectives for ‘Management’ and ‘Administrative Policies & Practices’ are statements of an individual’s position or week-to-week operations) as opposed to aspirational goals or objectives. Additionally, the Commission did not see detailed benchmarking against internal or external standards or data. In order to give CCSCE an additional opportunity to show that its IAIP includes objectives and benchmarking, the Commission determined that additional information is needed and recommends that CCSCE review the [ACCSC Monograph on Institutional Assessment and Improvement Planning](#). Based on the foregoing, the Commission directs CCSCE to submit 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 provided.
7. CCSCE must demonstrate that the school adheres to established criteria to assess a student’s academic progress through its programs or has procedures to report academic progress to students at regular intervals (*Section VII (A)(2)(c), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that while students received a monthly progress report, it was unclear what the report assessed and that 26% of students were dissatisfied with academic progress reporting to them. In response to the March 6, 2020 OER, CCSCE stated that its progress report had been revised to show areas graded and submitted a sample progress report. In reviewing the revised progress report, the Commission noted that although the reports are dated monthly, the use of the word, “periodically” makes it unclear as to when progress reports are complete. In addition, the Commission noted that the form does not contain sufficient information to guide students. For example, the “In Progress” score for the Medical Assistant Health Care Ed. Module does not show a breakdown of the score and as such does not allow the student to be informed of their progress within each module. Additionally, CCSCE did not address the fact that 26% of its student expressed dissatisfaction which how the school report student progress.

In order to give CCSCE an additional opportunity to revise and document its student academic progress policies and procedures, the Commission determined that additional monitoring is required. Accordingly, the Commission directs CCSCE to submit the following:

- a. A copy of the school’s policy and procedure on student academic progress;
  - b. Clarification as to the timeframe meant by the phrase, “Progress reports are completed periodically”; and
  - c. A survey of all students measuring student satisfaction with the reporting of student academic progress to them.
8. CCSCE must 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*). The on-site evaluation team noted that the provided lesson plans and syllabi appeared to be printouts from textbook publisher manuals as opposed to school curriculum and that syllabi did not include the schedules or number of hours per course. In response to the March 6, 2020 OER, CCSCE submitted a revised copy of the curriculum for the didactic, lab, and externship sections and an outline of the Diagnostic Medical Ultrasound Program. In reviewing the submitted copy of the curriculum, the Commission noted that while the submitted curriculum copy gives brief descriptions of each course, the descriptions do not show a scope or sequence of subject matter. The Commission further noted that the outline of the Diagnostic Medical Ultrasound Program contained the same notes and subjects copied from one week to the next for large sections of the course.

In order to give CCSCE an additional opportunity to demonstrate there is a detailed and organized instructional outline and course syllabi, the Commission determined that additional monitoring was required. Accordingly, the Commission directs CCSCE to submit a revised syllabi or curriculum copy showing the distinct scope and sequence or subject matter over the course of the program.

9. CCSCE must demonstrate that the period of a leave of absence may not begin until the student has submitted and the school has approved a written and signed request for an approved leave of absence (*Section VII (A)(3)(c)(i), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that four of six reviewed leave of absence request forms were not signed by the student. In response to the March 6, 2020 OER, CCSCE stated that students now receive a copy of the of the leave of absence form with both the student’s and school representative’s signatures and submitted a copy of a signed enrollment agreement. In reviewing the submitted enrollment agreement, the Commission found that student signatures were collected the same day of the expected return date or later and as such these forms do not show whether the leave of absence began with or without a student’s signed request. In order to give CCSCE an additional opportunity to provide documentation to show that its leave of absence policies and procedures are in compliance with ACCSC standards, the Commission decided that additional information is required. Accordingly, the Commission directs CCSCE to submit the following:
- a. A copy of the school’s policies and procedures for leaves of absence;
  - b. Leave of absence documentation for all students requesting a Leave of Absence between March 1, 2020 and September 30, 2020; and
  - c. An explanation for any student placed on a leave of absence under circumstances that do not comport with the school’s policies or ACCSC or federal requirements.

10. CCSCE must demonstrate that the school furnishes to the student prior to the student starting class a final copy of the enrollment agreement signed by both parties (*Section IV (C)(2)(d), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that students did not receive a fully executed copy of the EA. In response to the March 6, 2020 OER, CCSCE stated that students now receive fully executed copy of the enrollment agreement and submitted a copy of a fully executed enrollment agreement. In reviewing the submitted enrollment agreement, the Commission noted that while the agreement was signed by both the student and the school representative, the school did not show that the student received a copy of the fully executed enrollment agreement. In order to provide CCSCE with an additional opportunity to provide documentation that students receive a copy of the fully executed enrollment agreement, the Commission directs CCSCE to submit the following:
- a. A copy of the school’s policies and procedures for ensuring that students receive a copy of the fully executed enrollment agreement and
  - b. Evidence that students receive a copy of the fully executed enrollment agreement (e.g., copy of an email, letter, checklist).
11. CCSCE must demonstrate that the school executes an enrollment agreement for all enrolled students (*Section IV (C)(2)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted discrepancies in CCSCE’s enrollment agreement documentation including missing pages, signatures, inconsistent dates, and inconsistent credits. In response to the March 6, 2020 OER, CCSCE described changes in school practice that it believes ensure students and school representatives initial and acknowledge changes to enrollment agreements, ensure consistent dates throughout enrollment agreements, ensure that enrollment agreements are countersigned, ensure consistent references to credit hours, and ensure all required signatures were performed. CCSCE submitted sample enrollment agreements to support the changes made. In reviewing the changes and the submitted documents, the Commission acknowledged the school’s intent in making the changes but determined that given the scope of the changes, additional monitoring in this area is warranted.

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

- a. A copy of the school’s policy and procedure for executing enrollment agreements;
- b. For each student who was admitted to the school from September 1, 2020 to November 30, 2020, provide the following information:

Count	Student ID	Program	Date of Student Signature	Date of School Representative Signature	Date(s) of Admission Documentation Receipt	Start Date
1	123456	HVAC Technician	01/10/2018	1/29/2018	1/8/2020, 1/9/2020	2/1/2018
2	234567	HVAC Technician	01/10/2018	2/24/2018	1/9/2020	3/1/2018

and

- c. The following supplementary information for **each** student identified in item chart (b.) above:
  - i. A copy of the school’s completed fully executed enrollment agreement and
  - ii. The document(s) secured to demonstrate that each applicant meets all admissions.

12. CCSCE must demonstrate that prior to enrollment the school secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(b), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that CCSCE’s policy stated that students were required to take a random drug test, but no documentation was provided to ensure that students met this requirement prior to enrollment. In response to the March 6, 2020 OER, CCSCE stated that results were unavailable to the on-site evaluation team due to website issues and submitted a sample copy of the students’ drug test results. While the Commission noted the school’s response and explanation, the Commission could not determine whether CCSCE received the results prior to enrollment without accompanying enrollment agreements. In order to provide CCSCE with an additional opportunity to demonstrate that it secures all admission documentation for each applicant prior to enrollment, the Commission determined that additional information was required. Accordingly, the Commission directs CCSCE to submit the information identified in items 11(b.) and 11(c.) above.

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### **Warning Restrictions:**

Pursuant to *Section VII (K)(9), 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 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)(8) 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.

CCSCE 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>1</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.

CCSCE 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

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<sup>1</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).

the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

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

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before January 8, 2021**. If a response, the required fee,<sup>2</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before January 8, 2021**, 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]

Executive Director

c: [REDACTED]  
[REDACTED]

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<sup>2</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.