



Accrediting Commission of Career Schools and Colleges

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May 8, 2025

**ELECTRONIC DELIVERY**

[REDACTED]  
Vice President of Campus Operations  
Aviator College of Aeronautical Science & Technology  
606 Dyer Boulevard  
Kissimmee, Florida 34741

**School #B072629**  
**Probation Order**

Dear [REDACTED]:

At the February 2025 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Commission’s previous decision to place Aviator College of Aeronautical Science & Technology (“ACAST”) located in Kissimmee, Florida on Warning. Upon review of the November 26, 2025 Warning and the school’s response to that report, the Commission voted to place ACAST on **Probation** with a subsequent review scheduled for ACCSC’s **August 2025** meeting. The reasons for the Commission’s decision are set forth below.

### **History of the Commission’s Review:**

#### **August 2024<sup>1</sup>**

At the August 2024 meeting, the Commission considered the Application for Renewal of Accreditation submitted by Aviator College of Aeronautical Science & Technology located in Kissimmee, Florida. The Commission determined 16 areas of concern as described in its November 26, 2024 Warning. These areas of concern range from larger order issues such as the school’s management and administrative capacity to discrete operational areas such as the verification of faculty work experience. Given the number and range of concerns, the Commission placed the school on Warning with a future review at the Commission’s February 2025 meeting.

#### **February 2025**

1. ACAST 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 (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*);
- Appropriate administrative and operational policies and procedures to which the school adheres, reviews, and updates as needed (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*); and
- The continuity of management and administrative capacity through the reasonable retention of management and administrative staff (*Section I (A)(4) Substantive Standards, Standards of Accreditation*). As of the time of the on-site evaluation, there was significant turnover on campus and some staff informed the team that they were planning on resigning due to conditions at the school.

Previously, in light of the number of continued concerns listed in the June 23, 2024 OER, the Commission questioned whether the current management team’s experience and infrastructure is

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<sup>1</sup> The full details of the Commission’s review and decision from the August 2024 meeting are captured in the November 26, 2024 Commission letter.

appropriate to lead and manage a post-secondary educational institution in compliance with accrediting standards. Additionally, the evaluation team noted significant turnover in the Financial Aid and Student Services departments. In addition, the visiting team observed a lack of written policies and procedures for school operation, which has contributed to most of the findings noted in the review.

ACAST recognized the oversight concerns and stated in the school's July 23, 2024 response that:

*Aviator College acknowledges that it needs to increase its administrative oversight. Post-COVID-19, the student body doubled, even increasing our FAA approval for the maximum student population to 100 and expanding our campus. The resulting focus was to increase and retain a qualified faculty population, but the administrative staff was neglected (July 23, 2024 ACAST Response, pg. 3).*

*Other roles, such as admissions, financial aid assistant, student services, career services, and other administrative support roles, are being evaluated as each department identifies current roles and responsibilities and determines areas of need (Id.).*

Previously, to demonstrate the current administrative staff, ACAST provided a Management Personnel Retention Chart for all management/administrative level staff at the school for the period of January 1, 2024 to June 30, 2024. As part of the chart, the school listed [REDACTED],<sup>2</sup> President, and [REDACTED] Vice President, with a tenure of 40 years and 10 years, respectively; however, the response does not include information on the education, experience or demonstrated ability to lead and manage a post-secondary educational institutional in compliance with accrediting standards. In addition, ACCSC's records indicate that [REDACTED], Director of Academic Affairs serves as the School Director, but the organization chart lists the Director of Academic Affairs as reporting to the Vice President of Campus Operations, [REDACTED].

Although the school acknowledged the need to increase administrative oversight, the organization chart supplied in the July 23, 2024 response lists Vice President [REDACTED] (10 years of tenure at the school) as the person overseeing all of the directors and other senior management as reporting directly to President [REDACTED] (40 years of tenure at the school). The July 23, 2024 response also states that Director of Admissions previously reported to the College President and that College President has "been mostly out ill in the last few years" and that "there has been no oversight or accountability for the Director of Admissions, as his direct report has been mostly unavailable" (*Id.*, pg. 37). Given that these individuals have not ensured continuous compliance with ACCSC accrediting standards and appear to have abstained responsibility—despite having 50 years of combined experience—the Commission questioned whether the school has completed the necessary analysis and identified the root cause of the issues that led to these findings.

With regard to the appropriate administrative and operational policies and procedures, ACAST uses the General Operations Manual (GOM) and Employee Handbook. Additionally, the July 23, 2024 response states that:

*The GOM is drafted around FAA requirements but includes many of the Kissimmee Campus's operations policies and procedures. The Vice President of Campus Operations has been assigned to review the GOM, as it requires the FAA signatory to submit the document for approval. Under the new Vice President of Campus Operations, the GOM is undergoing an edit to fulfill the requirements completely. This will ensure that the manual aligns with all published policies and that other areas not currently covered in the Handbook can be added*

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<sup>2</sup> More recently, subsequent to the February 2025 meeting the Commission received ACAST's April 30, 2025 notification of a leadership change upon the death of [REDACTED]. Based on this notice, the Commission anticipates that the school's response to this letter will contemplate the change.

*to it. Upon completion, the updates will be submitted to the Commission. As a commitment to improvement and in line with the College Assessment and Improvement guidelines, the policies and procedures will be evaluated now and then placed into the April cycle identified in the Employee Handbook. The College will give specific consideration to areas of operations that directly impact employees as they serve and support the student population and students as they pursue a course of study that will lead to a career (Id.).*

The Commission is interested in reviewing the updates to the employee handbook along with any other pertinent information along with documentation for implementation of appropriate administrative and operational policies and procedures.

Regarding the continuity of management and administrative capacity, the Commission's November 26, 2024 Warning noted that while the school did not have turnover for the period of January 1, 2024 to June 30, 2024, the response indicates that "the Campus Director, [REDACTED], has resigned as of July 10, 2024" (Id.), the school elevated the current Director of Education to Vice President of Campus Operations, and that the school is searching for a new Director of Education. In addition, the President, Vice President, Director of Academic Affairs, Director of Financial Aid/Veterans Affairs, Librarian, and the previous Campus Director appear to be shared resources with the main campus located 100 miles away leading the Commission to question the adequacy and effectiveness of oversight of both the main campus and the branch campus. Further, the July 23, 2024 response notes that the school "lacked clearly identified job roles, tasks, responsibility, and expectations," that each department functioned "almost entirely independently of the others," that understanding compliance efforts is needed ahead of offering "professional development efforts to keep employees engaged and truly help them access training resources that allow them to improve in various areas" (Id.). However, these appear to the Commission to be upcoming plans rather than a demonstration of current adequate management and administrative capacity.

The Commission previously found that the school's compliance efforts appeared to constitute primarily upcoming plans as opposed to documentation of current management and administrative capacity in compliance with accrediting standards. The Commission requested an administrative organization chart with job descriptions for each administrative position, retention charts, turnover rates, and an update on retention efforts, an explanation as to the President's and Vice President's oversight, the school's current population, justification as to how the school has a sufficient amount of managers and administrative employees necessary to lead and manage the school in compliance with accrediting standards, an updated description of the main school's oversight of the Kissimmee branch, training documentation, and updated administrative and operational policies and procedures along with a description of how the school reviews its policies and procedures.

### **January 22, 2025 Response**

In its January 22, 2025 response, ACAST submitted a retention chart and retention initiatives, organization chart and job descriptions, explanations and justification of oversight and administrative capacity at the Kissimmee campus, documentation of training, the school's management and administrative turnover rate, updated administrative and operational policies and procedures, and information as to how the school reviews its policies and procedures. ACAST additionally noted the school's appreciation for the Commission's "understanding of the spring review as time has been spent training new hires and reestablishing internal procedures and best practices to create alignment within the administrative team" (January 22, 2025 ACAST Response, pg. 9). The school also noted an ongoing assessment process in the areas of concern identified in the Commission's November 26, 2024 Warning and further indicated that the assessment process would support the school's Institutional Assessment and Improvement Activities.

The school's retention chart contains 19 administrative/operational staff with one listed individual having been terminated. Of those 18 staff remaining, 9 staff (50%) have 18 months or less of tenure. Of those 9 staff, 6 have tenure of under a year. The school's response explains that the Director of Academic Affairs is working to increase retention by "establishing position expectations, responsibilities, applicable standards, and data reporting requirements" (*Id.*, pg. 5). The response additionally notes that the school is continuing to work on occupational manuals, is surveying employees during the spring assessment period, and is improving communication with employees. As evidence of training, the school provided minutes of trainings led by the Director of Academic Affairs and the SonisWeb SIS account management team, and documentation of staff completions of ACCSC online trainings.

The school assessed its rate of management and administrative turnover as 30% for the time period of January 1, 2024 to November 30, 2024, stating that "[t]he college does acknowledge that this is twice as high as the 2023 published national average for higher education" (*Id.*, pg. 8). The school further noted that "one of the three employees who left the organization was the lead administrator for the campus and therefore directly responsible for many of the Commission's findings and failures to meet substantive standards" (*Id.*). As noted in the Commission's review of ACAST's Fort Pierce Campus, as time continues without the school documenting its compliance with standards, the Commission questions the school's assessment that its issues were driven by the employees who left the school.

While building tenure of staff requires the passage of time, the Commission's concerns regarding the school's administrative and operational capacity to operate the school in compliance with accrediting standards are more immediate. The Commission determined that the school did not show a reasonable amount of retention and as a result is out of compliance with *Section I (A)(4) Substantive Standards, Standards of Accreditation*.

ACAST described the daily oversight of its President and Vice President. With regard to the school's President, ACAST stated that the President

*is responsible for all operational decisions involving costs and contracts. He receives and updates the financial status of all ACAST accounts daily and is in contact with all key administrators either in person or via phone. Although President [REDACTED] may not be involved in every day-to-day operations or personnel decision, he must approve any changes or additions before they can be enacted (Id., pg. 3).*

With regard to the school's Vice President, ACAST stated that:

*Day-to-day onsite operations are managed by the Vice President of Campus Operations in cooperation with the Vice President, [REDACTED]. They are in daily communication, via phone or email to address updates, logistics, purchase orders, budget considerations, personnel decisions and payroll (Id.).*

Given the number of findings of non-compliance and areas of ongoing concern across two campuses, the Commission was unconvinced by the minimal description of the President's and Vice President's daily oversight of the Kissimmee campus. The Commission is particularly concerned, given that the school's Vice President of Campus Operations, the primary manager of day-to-day campus operations, has only six months of tenure in his current position and must rely on phone and email support with non-present leadership to make day to day decisions at the school. ACAST noted six individuals (Vice President of Campus Operations, Director of Education, Registrar, Director of Admissions, Financial Aid Assistant, Student and Career Services Coordinator) responsible for day-to-day onsite management with oversight and support by five individuals (President, Vice President, Director of Academic Affairs,



Director of Financial Aid, and Human Resources and Career Services Coordinator). The Commission is interested in a full accounting of these individuals' educational experience and training.

ACAST noted that with an active population of 94 students, the school maintained a student-to-administrator ratio of one administrator to 16 students, which the school argues is a normal range for a small college "...sufficient to serve the student body with personalized services" (*Id.*, pg. 4). ACAST further averred that the school "has a team that includes a variety of education, experience, and leadership to manage the college in compliance with accrediting standards, and any gaps in that understanding are being addressed as a team through meetings, conversations, and training" with the President also creating an executive team starting with the school's assessment period between February 1 and April 30 (*Id.*). ACAST also indicated its plans to add two faculty members, a library assistant, and a human resources career services coordinator to provide services to both students and ACAST staff.

Given the number of findings of non-compliance and areas of ongoing concern across multiple areas of the standards encompassing administrative policies and procedures captured in this letter (e.g., refunds, admissions, recruiting, and the verification of faculty previous experience), the Commission found the school out of compliance with (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*).

Concordantly, the Commission determined that the administrative team's gaps in understanding of accrediting standards are substantial such that the school's team that leads and manages the school lacks an appropriate level of experience and demonstrated ability to manage the school in compliance with accrediting standards. Accordingly, the Commission found that the school is out of compliance with *Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*.

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

- a. A Management Personnel Retention Chart for all management/administrative level staff at the school for the period of December 1, 2024 to May 31, 2025 using the following format:

Name	Title	Initial Date of Employment	Initial Date of Employment for Current Position	Tenure of Service for Current Position		Reason for Leaving/Termination (if applicable)
				Yrs.	Mos.	

- b. The school's turnover rate for management and administrative staff for the time period December 1, 2024 to June 30, 2025;
- c. The school's current population to include the number of students in non-vocational programs;
- d. [Personnel Reports](#) for each management and administrative staff member at the campus;
- e. An update of the school's efforts to increase retention for management and administrative staff including any new initiatives developed by the school, the average tenure of managers based on the data submitted in the above chart, and a summary of the impact of the strategies employed to ensure greater retention going forward;
- f. A description of and evidence of completion for all training in which management and administrative staff engaged during the time period of December 1, 2024 to June 30, 2025 (please highlight any newly hired staff during this period and all of the training these individuals received);
- g. A description of any updated administrative and operational policies and procedures along with documentation of those updates; and

- h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
2. ACAST reported student graduation and employment rates that do not meet ACCSC's minimum benchmarks as outlined below (*Section VII (B)(2)(b), Substantive Standards, Appendix VI, Standards of Accreditation*). The on-site evaluation team noted that although licensure is required by the Federal Aviation Administration, the school does not track licensure rates.

As part of the school's response to the June 23, 2024 OER, using a July 2024 Report Date, the school reported a below benchmark rate of 18% employment for the Aviation Maintenance Technician (Certificate) program. The school's response did not make clear whether licensure is required for employment in the field.

As part of the school's January 22, 2025 response to the November 26, 2024 Warning, the school indicated a Graduation and Employment chart was included in the response, however, it did not appear to be included in the attachments. The school stated that the employment was still below the benchmark rate of 70% for employment and backup documentation provided for the reporting timeframe did support the reported student achievement rates. One employed graduate job title indicated they worked customer service for an airline (January 22, 2025 ACAST Response, pg. 431). The Commission questioned whether this graduate was correctly classified as an in-field placement for the Aviation Maintenance Technician program. Additionally, ACAST clarified that the program is being offered at a 16-month length and not an 18-month length as has previously been reported to the Commission. This change does not change the benchmark rate for either graduation or employment.

The school provided clarifying information related to the licensure exam for the graduates of the program. With the training provided, graduates have a lifetime to take the licensure exam. The exam is comprised of several parts and once the first exam is taken, all must be taken within two years to become licensed. The school noted its belief that the licensure process negatively affects graduates achieving licensure and then employment, but the school did not provide strategies or initiatives to address this issue. Without graduation and employment charts or complete backup documentation to verify reported rates, the Commission found the school to be out of compliance with *Section VII (B)(2)(b), Substantive Standards, Appendix VI, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school providing the following:

- a. The school's student achievement improvement plan for the Aviation Maintenance Technician (Certificate) program specifically addressing any enhancements or modifications made in the following areas:
  - i. Curriculum and/or training equipment;
  - ii. Student Services; and
  - iii. Career services and employer engagement.
- b. An assessment of the effectiveness of the school's student achievement improvement efforts.
- c. An evaluation of current employment trends including an assessment as to when the Aviation Maintenance Technician (Certificate) program's graduation and employment rates are expected to meet ACCSC's benchmark rates.
- d. Licensure rates for the Aviation Maintenance Technician (Certificate) program;
- e. Clarification if licensure is required for initial employment;



- f. A Graduation and Employment Chart for the Aviation Maintenance Technician (Certificate) program using **January 2025 Report Date**.
- g. 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:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Aviation Maintenance Technician	01/10/2024	01/01/2025	N/A
2	12346	Aviation Maintenance Technician	01/10/2024	N/A	07/10/2024

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

Count	Graduate 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 field<sup>3</sup> (line #14), provide the following information:

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

- v. Supporting and verifiable documentation or a narrative justification for each graduate in (iv.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study.
      - vi. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Count	Graduate ID	Program	Start Date	Graduation 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,” provide the following:

Count	Graduate ID	Program	Start Date	Graduation 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.

<sup>3</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.



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

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File
1						

- xi. Supporting and verifiable documentation for any graduate classified in (x) to include, minimally, external documentation such as transcripts/enrollment agreements for “Graduates-Further Education” and military orders, letter from physician/doctor, death notice/obituary, public record of incarceration, etc. for “Graduates-Unavailable for Employment.”
- h. 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. ACAST must demonstrate that the school supports student achievement rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VII (B)(2)(b)& Appendix VII, Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school was unable to provide documentation for initial employment or the Third-Party Verification Report. In addition, the evaluation team found that the Independent Third-Party was unable to verify 62.5% (5 of 8) graduates. As part of the school’s response to the OER, documentation of initial employment for 10 graduates was provided. However, the employment forms all appeared to be different and did not, in all instances, include the required documentation outlined in *Appendix VII – Guidelines for Employment Classification*. As such, the Commission remains interested in how the school verifies employment of graduates and collects all necessary information.

As part of the ACAST’s January 22, 2025 response to the Commission’s November 26, 2024 Warning, the school submitted emails from employers regarding employment verification. It appeared the emails included PDF files for employment verification. However, the school did not in all instances include the files attached to the emails. Therefore, the Commission found the school to be out of compliance with *Section VII (B)(2)(b)& Appendix VII, Substantive Standards, Standards of Accreditation*.

As such, ACAST is directed to submit the following:

- The school’s policies and procedures related to initial employment verification;
- A description of the school’s graduate assistance to include the current personnel responsible for assisting students with placement;
- A copy of the school’s current verification form or other tool the school is currently using to verify employment;
- A list of the 10 most recent graduates who gained employment in the career field for which the school provided education using the following chart (sample text in grey):

Count	Graduate ID	Program	Start Date	Graduation Date	Employer, Address, Phone #, & Point of Contact	Date of Initial Employ.	Descriptive Job Title	Date Employment Verified
1	0001	Aviation Maintenance Technician	1/10/2023	01/10/2024	ABC Airline, 123 Sample Way, Anywhere, MD 222.333.1234 John Doe	2/1/2024	AMT	3/15/2024
2	1234	Aviation Maintenance Technician	1/10/2023	01/10/2024	CDE Airline, 456 Maple Dr. Somewhere, VA 333.444.5678 Jane Smith	3/1/2024	AMT	4/15/2025

- The following supplementary information for each graduate identified in the chart (d.) above:



- i. A 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; and
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with ACCSC's requirements.
4. ACAST must demonstrate that the school applies a fair and equitable refund policy or that the school's established refund policy complies with state and federal requirements (*Section I (D)(3), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the school's catalog stated, "[i]f a refund is due to the student, it will be paid within 30 days of the date that the student either officially withdraws or the College determines that the student has withdrawn." The team questioned whether the school's refund policy is compliant with requirements of the state of Florida and the U.S. Department of Education. Based on the team's review, the refund for one student, Student [REDACTED], was not made in a timely manner in accordance with the school's published policy.

As an explanation for the circumstances that resulted in refunds being late, ACAST noted that former Financial Aid Director handled the refund that "was started timely, but the full refund was not processed until later" and that "[i]t appears to be an oversight, but that is just conjecture" (July 23, 2024 ACAST Response, pg. 19).

Additionally, in the July 23, 2024 response, ACAST provided the refund policy that states in part that:

*If a refund is due to the student, it will be paid within 30 days of the date that the student either officially withdraws or the College determines that the student has withdrawn. All refunds will be calculated using the student's last day of class attendance. If a student withdraws without written or verbal notice after classes have started, termination shall be effective on the student's last date of attendance as determined by the institution (Id., pg. 16).*

However, the policy does not define how the school determines that the student has withdrawn in cases where a student has not taken steps to officially withdraw. As such, the policy appears to state that the student's last day of class attendance ("LDA") is the same as the date that the school determines a student to be withdrawn ("DOD"). In reviewing the 10 most recently withdrawn students who were owed a refund, the Commission previously found that the refund due date is based on the DOD that does not always correspond to the LDA. In addition, ACAST noted one late refund without information to determine the cause of the late payment. As the school's policy and response do not provide sufficient and clear information regarding the calculation of the DOD or why refunds were late in the past, it was unclear whether the school is applying a fair and equitable refund policy.

Further, the response states that:

*While the college has made great strides to reduce any refunds going beyond the 30 days, there have still been a few areas that have continued to cause delays in final refund processing, which the college is working to correct. (Id., pg. 21).*

and

*The College will be amending some of its refund policies and processing for the Fall 2024 term by considering changes to:*

- 1. Fall Term adoption of a policy to track flightline attendance to ensure that any absences are caught before the requisite extended inactivity where a student needs to be withdrawn.*
- 2. Attendance tracking is to be done bi-monthly to identify any students at risk of withdrawal for non-attendance.*
- 3. Use SIS notifications to trigger withdrawal notifications so the processing can be indicated, tracked, and closed in the student's record rather than via email (Id., pg. 23).*

While the Commission recognized the amendment of the refund policies and processing along with the recent staffing changes to alleviate these issues, the Commission remains interested in assessing the school's policy and practices, in particular with regard to fair practices.

The Commission's November 26, 2024 Warning requested the school's refund policy, a description as to how the school determines a student's date of determination as compared to the last date of attendance, an update on the school's implementation of amended policies, and documentation regarding the ten most recent refunds. The school provided in its January 22, 2025 response its catalog with an updated refund policy and noted that one student was due a refund within the requested time period. The school did not provide a description of how the school determines its DOD or any of the requested documentation of the refund. Without a complete response or documentation to verify that the school follows its refund policy and procedure, the Commission determined that the school is out of compliance with *Section I (D)(3), Substantive Standards, Standards of Accreditation*.

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

- a. A copy of the school's refund policy as listed in the catalog and enrollment agreement;
- b. A description as to how the school determines a student's date of determination as compared to the last date of attendance;
- c. A list of the 10 most recent withdrawn/terminated students between January 1, 2025 and June 30, 2025 owed a refund organized as follows:

Student ID#	Start Date	LDA	DOD	Refund Due Date	Date Refund Paid	Refund Amount	# of Days Between LDA & DOD

- d. Refund information for each student listed in (d.) above to include:
  - i. The enclosed Refund Report Summary Sheet and Refund Report Worksheet;
  - ii. Documentation of how the school made the determination that the student had withdrawn;
  - iii. Copies of all electronic refund transactions and/or check—and back—issue for the purpose of student refunds; and
  - iv. In case the refunds of cash payments, and explanation and accompanying documentation of the funds were returned to students;

- e. 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 policy; and
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards related to student refunds.
5. ACAST must demonstrate that the school is attentive to its students' educational and other needs as a means to support retention, maintains written policies and procedures addressing student services, and makes students aware of such services (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). At the time of the On-Site Evaluation, the results from the student survey indicated dissatisfaction with the training equipment. Additionally, the team noted that the school did not maintain written policies and procedures addressing student services and making students aware of these services. In response to the OER, ACAST provided the draft catalog pages related to student services, showing areas such as advising, tutoring, library resource center and career services. In an attempt to raise satisfaction with training equipment, the school reported that a new parts room manager had been hired to maintain equipment organization and instructor requests for that equipment.

In response to the Warning, ACAST provided a Student Services Operational Handbook. The school also explained that equipment type and quantity are determined by the FAA and that the FAA conducts investigations throughout the year and that the school is in compliance with those guidelines and requirements.

The school did not, however, provide all information related to student services as directed. The school did not provide a description of how the school is measuring effectiveness of its strategies or an updated student survey. As such, the Commission found ACAST to be out of compliance with *Section VI (A)(1), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school providing the following:

- a. The school's written policies and procedures addressing student services;
- b. An assessment of the school's availability of training equipment;
- c. An explanation as to whether the school has an adequate amount of necessary training equipment for the amount of students to include review by the school's Program Advisory Committee;
- d. A description of the school's mechanisms for remaining attentive to student needs;
- e. An explanation as to how the strategies implemented by the school are intended to target those factors;
- f. A description of how the school is measuring the effectiveness of those strategies to include the results of a student survey including:
  - i. A description of the student survey process and a copy of the survey instrument used;
  - ii. A detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction; and
  - iii. A detailed narrative of the school's plan to address any areas of student dissatisfaction, if applicable, and any other information to support the efforts made to enhance a student's experience at the school; and
- g. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.



6. ACAST must 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 school's 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 and the school did not document the implementation of assessment and professional development activities for its faculty (*Section III (A)(2), Substantive Standards, Standards of Accreditation*); and
- The school's faculty engage in ongoing development of teaching skills as part of its plan for faculty improvement (*Section III (B)(4), Substantive Standards, Standards of Accreditation*).

The on-site evaluation team noted that the school could not provide documentation that management and administrative employees are engaged in professional development or training activities. Additionally, the team found that there was no professional development in place for faculty.

In response to the June 23, 2024 OER, ACAST provided a copy of the Employee Handbook which includes a requirement for employees to be engaged in professional development at least annually. The school also provided a plan for the Director of Education to provide trainings during in-service days.

The Commission's November 26, 2024 Warning requested any updated training and development policies and procedures, an organization chart for management and administrative staff along with documentation of training and development for the listed staff, faculty personnel reports for the school's faculty along with supporting documentation of training and assessment, and documentation of quarterly reminders to show the school's plan to ensure compliance on an ongoing basis.

In the January 22, 2025 response to the November 26, 2024 Warning, ACAST provided an Employee Handbook, and organizational chart, and evidence of training. However, the evidence of training for faculty was in several cases poorly copied and difficult to read and interpret (see pages 701, 707, 711, and 712), lacked signatures (see pages 702, 705, and 706) leaving the Commission to question whether examples were provided for each individual as requested and whether each example was documentation of recent professional development (*Id.*). Additionally, while the Commission requested faculty personnel reports for each current faculty member (7 faculty members), ACAST's response appears to only contain one faculty personnel report which is mostly illegible (*Id.*, pg. 743). Finally, the Commission noted that the school did not respond to the Commission's request for documentation of quarterly reminders to demonstrate the school's plan to ensure compliance on an ongoing basis. With the school not responding to requests and providing illegible documents, the Commission did not find the school in compliance with *Section I (A)(3), Section III (A)(2), and Section III (B)(4), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school providing the following:

- a. A copy of any updated policies and procedures for school management and administrative staff ongoing training and development;
- b. An organization chart listing the school management and administrative staff along with name and job titles;

- c. Documentation for each individual identified as school management and administrative staff on the organization chart demonstrating adherence to the school's policies and procedures for ongoing training and development since the school's last response;
  - d. The school's policies and procedures for ongoing faculty assessment and professional development activities;
  - e. A list of current faculty members along with a [Faculty Personnel Report](#) for each;
  - f. Supporting documentation of implementation of assessment and professional development activities for each current faculty member per the school's policies and procedures;
  - g. Documentation of the quarterly reminders to demonstrate the school's plan to ensure compliance on an ongoing basis; and
  - h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
7. ACAST must demonstrate that the school ensures the continuity of instruction by the reasonable retention of the educational administrative staff and faculty (*Section III (A)(3), Substantive Standards, Standards of Accreditation*). The evaluation team found that 4 of 6 instructors had less than one year of tenure.

As part of the response to the June 23, 2024 OER, ACAST included a Faculty Retention Chart that two of the full-time faculty have been in the position for less than one year, one part-time instructor recently left, and the five remaining instructors, four full-time and one part-time, the average tenure is just under 18 months. To increase the average tenure of faculty, the school planned to create clear expectations and outlining a clear job description for each role, build a collaborative culture by encouraging departments to work together, fulfill career growth by offering professional development opportunities, and seek ways to recognize and reward those who are working to improve the school through internal recognition, extra vacation time, or a pay increase.

In its January 22, 2025 response to the Commission's November 26, 2024 Warning, ACAST provided a faculty and educational administrative staff retention chart covering the period from July 1, 2024 to December 31, 2024. This chart includes seven individuals including one member no longer with the school. The Commission noted that no member of the educational team has been with the school for longer than three years and nine months. The VP of Campus Operations who oversees the Educational team has been at the school for only six months and the Director of Education has been at the school only one month after the previous Director of Education was terminated after four months.

The school was required to submit a detailed description of the school's efforts to increase retention. ACAST's response was that the school has been working to hire individuals who are a good fit for the organization. The school did not provide any information about any strategies to retain current faculty and staff. Additionally, the school did not provide a turnover rate for faculty and educational administrative staff as requested.

While the Commission recognized that faculty retention takes time to build, the short time those managing the education at the school have been in their roles and the lack of information provided by the school, the Commission found that the school is out of compliance with *Section III (A)(3), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school providing the following:

- a. A Faculty Retention Chart for all educational administrative staff and faculty at the school for the period of January 1, 2025 to June 30, 2025 using the following format:

Name	Title	Initial Date of Employment	Initial Date of Employment for Current Position	Tenure of Service for Current Position		Reason for Leaving/Termination (if applicable)
				Yrs.	Mos.	

- b. A detailed description of the school's efforts to increase retention of the educational administrative staff and faculty including any new initiatives developed by the school, the average tenure of instructors and educational administrative staff based on the data submitted in the above chart, and a summary of the impact of the strategies employed to ensure greater retention going forward;
  - c. Evidence of any training for any new faculty and educational administrative staff hired during the time period January 1, 2025 to June 30, 2025;
  - d. The school's turnover rate for educational administrative staff and faculty for the time period January 1, 2025 to June 30, 2025;
  - e. A detailed description of the oversight of the educational administrative staff and faculty; and
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
8. ACAST must demonstrate that the school verifies prior work experience and maintains documentation of academic credentials of all faculty members and administrators (*Section III (A)(4), Substantive Standards, Standards of Accreditation*). The school did not provide documentation to the evaluation team demonstrating verification of prior work experience for any faculty members.

As part of the response to the June 23, 2024 OER, ACAST included an explanation that the school utilizes Equifax for faculty verification and that the process has changed whereby the school intends to contract with a third-party verification company to ensure accurate and timely verification of prior work experience. While the school included resumés for each of the faculty and educational administrative staff to demonstrate experience, not all the faculty files included the Equifax verification of prior employment. In addition, as the school did not provide information as to which courses each faculty member is teaching, it was unclear if the professional work experience listed for each faculty member is related to the training provided by the school. Additionally, no education information, including transcripts or credentials, was included for the Director of Education.

The Commission's November 26, 2024 Warning requested the school's policy for verifying faculty prior work experience and documentation of verification for the school's faculty. In its January 22, 2025 response to the Warning, ACAST provided a list of faculty, and evidence of training for those individuals. However, the evidence of training was nearly indecipherable in several cases (see pgs. 701, 711, 712, 742, and 743) as the documents were copied poorly (January 22, 2025 ACAST Response). The school provided only one illegible faculty personnel report but noted four faculty members and it did not appear, in any of the documentation provided, that the school verified prior work experience or licensure for any of their faculty. Accordingly, the Commission found ACAST to be out of compliance with *Section III (A)(4), Substantive Standards, Standards of Accreditation*.

Based on the foregoing, the Commission directs the school providing the following:

- a. The school's policy for verifying faculty prior work experience;



- b. A narrative describing the employment verification process for all faculty members and administrators;
  - c. A list of all current faculty members;
  - d. Documentation to demonstrate that all faculty members possess the appropriate years of related practical work experience in the subject area taught, including evidence that the school has verified that prior work experience;
  - e. Documentation that all faculty members are certified or licensed where required by law;
  - f. Alternately, if any of these faculty have been removed from the schedule, provide the qualifications for the instructor or instructors who are currently teaching those subjects, including completed Faculty Personnel Reports, available at [www.accsc.org](http://www.accsc.org);
  - g. A copy of faculty credentials for each faculty member listed above; and
  - h. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
9. ACAST must demonstrate that demonstrate that prior to enrollment the school determines that an applicant meets the school's admissions requirements and secures documentation to demonstrate that each applicant meets all admission requirements (*Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*). In the review of current and graduate student files, the evaluation team noted that all files did not have the required English Proficiency test.

In response to the June 23, 2024 OER, ACAST provided the information as published in the school catalog regarding English Proficiency and indicated that the school did not collect the English proficiency test for the 10 most recently enrolled students. Additionally, the response states that:

*The Director of Admissions has acknowledged the lack of English Proficiency testing, citing a lack of awareness of the policy and a belief that Puerto Rico was an exemption from the testing requirement as a country.*

*This oversight is largely due to the administrative hierarchy detailed in the campus General Operations Manual, which has the Director of Admissions reporting directly to the College President. As he's been mostly out ill in the last few years, there has been no oversight or accountability for the Director of Admissions, as his direct report has been mostly unavailable.*

*This lack of oversight will be corrected through administrative changes. A new Vice President of Campus Operations will be positioned to hold the Director of Admissions accountable for his work product while also establishing more involvement in front of the Registrar in document review and acceptance. The Director of Academic Affairs will conduct training on all published admissions policies to ensure compliance with stated requirements (July 23, 2024 ACAST Response, pg. 37).*

Most concerning to the Commission is the statement regarding the lack of oversight and accountability for a period of several years. The Commission questioned whether the below benchmark employment rates are possibly attributable to lack of oversight and the extent to which the school may be enrolling students who are not likely to succeed.

The Commission's November 26, 2024 Warning requested the school's admissions criteria and policies and procedures for the English Proficiency test, a list of the 10 most-recent enrolled students requiring the admissions English Proficiency test, and a copy of those students' enrollment agreements and English Proficiency tests. ACAST noted that the school requires tests of English Proficiency for

students whose transcripts have been evaluated as foreign transcripts. In its January 22, 2025 response, the school provided a list of 10 recently enrolled students, but only provided two students who took the English Proficiency Test. The school did not provide any of the requested enrollment agreements or English Proficiency Tests. Given the Commission’s previous concern regarding a lack of oversight and accountability, this lack of documentation deepened the Commission’s concern. The Commission found the school to be out of compliance with *Section V (A)(4)(a-b), Substantive Standards, Standards of Accreditation*.

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

- a. The school’s current admissions criteria, policies and procedures for the English Proficiency test;
- b. A list of the 10 most-recently enrolled students requiring the English Proficiency test to include the following information:

Student ID#	Program	Date of English Proficiency Test	Date Enrollment Agreement Signed by Accepting School Official	Start Date

- c. A copy of the executed enrollment agreement and English Proficiency test to include the corresponding Student ID# for each student included in the list above; and
- d. Any additional information that the school believes will assist the Commission in determining the school’s compliance with accrediting standards.

10. ACAST must demonstrate that:

- The school’s personnel are trained and qualified to engage in recruiting activities (*Section IV (A)(5), Substantive Standards, Standards of Accreditation*);
- The school has in place policies and procedures and takes reasonable steps to ensure that its personnel do not make false, exaggerated, or misleading statements about the school, its personnel, its training, its services, or its accredited status and to ensure that its personnel do not make explicit or implicit promises of employment or salary prospects to prospective students (*Section IV (A)(8), Substantive Standards, Standards of Accreditation*); and
- The school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually and maintains documentation of the review and evaluation (*Section IV (A)(9), Substantive Standards, Standards of Accreditation*).

During the on-site evaluation, the school did not provide documentation of training for recruitment/admissions staff or appear to maintain any policies or procedures specific to admissions personnel. The school did not have measures in place to ensure that it reviews and evaluates policies and procedures and the performance of recruiting personnel as there was no documentation of any reviews/evaluations. Additionally, the school did not demonstrate clear oversight within the admissions department.

The school’s response to the June 23, 2024 OER states that “[t]he Director of Admissions for the campus has been repositioned to directly report to the newly appointed Vice President of Campus Operations, allowing for more accountability” (July 23, 2024 ACAST Response, pg. 37) and that the Director of Admissions was not “engaging the Registrar in the process to ensure that a second set of eyes reviews all submitted admissions documentation for accuracy and completeness before admitting the student” (*Id.*, pg. 38). Additionally, while the response indicates that the school’s policies and procedures are “tied to the State of Florida Commission on Independent Education’s Agent Training

Standards” the response also indicates that “a final guideline for all recruiting policies will be developed” (*Id.*, pg. 70). Furthermore, the response only identifies two people within the admissions department, [REDACTED], Director of Admissions and [REDACTED], Financial Aid Assistant, without clearly identifying how these individuals complete the recruitment aspect of attracting qualified prospective students.

With regard to internally reviewing and evaluating the school’s recruiting policies and procedures, the response indicates that while there is an annual review requirement, the internal review mechanisms have not been consistently used and therefore, there are not “any standard admissions metrics to be used in the evaluation process” (*Id.*, pg. 40). Furthermore, ACAST stated that “no annual review has been conducted on the Director of Admissions in his five years in that position” (*Id.*, pg. 41). In addition, although the admissions team was trained in February, the team “is still ironing out some system usage with inquiries, prospects, and applicants, so the goal is that there will be solid metrics to conduct a more thorough evaluation” (*Id.*, pg. 41). Additionally, the school indicated that the Director of Academic Affairs will shadow admission personnel and assess training needs.

The Commission’s November 26, 2024 Warning requested an update on the school’s recruiting activities since the on-site evaluation, a description of the school’s policy and procedure for admissions and enrollment, and training and qualifications of recruiting personnel, an explanation as to the qualifications of recruiting and admissions personnel, an update and narrative as to the school’s policy and procedure for the evaluation of recruiting policies and procedures and recruiting personnel, documentation of the school’s review of each person involved in recruiting activities along with documentation of shadowing and training completed by recruitment and admissions staff, and an explanation as to the school’s plan to maintain compliance on an ongoing basis.

In response to the November 26, 2024 Warning, ACAST explained that after the on-site evaluation, the school added a Vice President of Campus Operations and “developed a better oversight process for our admissions department” where admissions documents are “collected, evaluated and then approved by our Registrar and VP of campus operations” (January 22, 2025 ACAST Response, pg. 34). The school also improved its student record security through website updates. As a description of the school’s policy and procedure related to training and qualifications of recruiting personnel, the school noted that its Director of Admission is “coached, supported and evaluated” by both the on-campus Vice President of Operations and the Vice President of Campus Affairs (*Id.*). The school also described the use of ACCSC trainings and campus workshops to discuss best practices and needed improvements. The school noted that its Director of Admissions, a Certified Accreditation Professional with 15 years of compliance and admissions experience, is the only staff person directly involved in recruitment and that its Registrar plays an indirect role through their review of admissions materials and decision in final admission approval into the school’s program. The school did not provide its policies and procedures specific to admissions or enrolling students. The school additionally averred that it does not employ any recruiting personnel and indicated that the Director of Admissions has not been shadowed and that they conducted trainings on the school’s policies and procedures.

The Commission noted, however, that recruitment is not merely the act of lead generation but rather the process by which the school describes itself fully and accurately to prospective students and permits prospective students to make well-informed and considered enrollment decisions without undue pressure (*Section IV – Statement of Purpose, Substantive Standards, Standards of Accreditation*). As ACAST engages in recruitment efforts involving school personnel talking with prospective students prior to enrollment, the school’s lack of policies and procedures in this area is out of compliance with *Section IV (A)(8), Substantive Standards, Standards of Accreditation* and *Section IV (A)(9), Substantive Standards, Standards of Accreditation*. Additionally, as ACAST does not internally review or evaluate



admissions personnel, the school is out of compliance with *Section IV (A)(5), Substantive Standards, Standards of Accreditation* and *Section IV (A)(9), Substantive Standards, Standards of Accreditation*.

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

- a. A description of the school's policy and procedure related to the training and qualifications of recruiting personnel, those individuals responsible for attracting qualified prospective students to include an update on the school's final guidance previously in development;
- b. A list of all personnel who engage in recruitment and admissions functions;
- c. An explanation for how these personnel are qualified to assist the prospective student population;
- d. The school's policies and procedures specific to admissions and the process of enrolling students at the institution;
- e. An update on the school's policy and procedure for the review and evaluation of recruiting policies, procedures, and the performance of recruiting personnel;
- f. A narrative regarding how the school internally reviews and evaluates its recruiting policies and procedures and the performance of personnel involved in recruiting activities for compliance with accrediting standards and applicable law and regulation at least once annually;
- g. Documentation to demonstrate any internal review and evaluation to include the annual review and evaluation for each person involved in recruiting activities;
- h. An explanation for how the school will remain in compliance on an ongoing basis; and
- i. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

11. ACAST must demonstrate that:

- The school has conducted at least one meeting of the Program Advisory Committee annually (*Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation*) and
- The school gives consideration to Program Advisory Committee input (*Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation*).

At the time of the evaluation the school did not provide documentation that Program Advisory Committee meetings were held in 2020-2023. As part of the response to the OER, the school included a plan to evaluate program curriculum every 24 months. The response also included information from a PAC meeting that occurred in May 2024 which included suggested safety equipment and curriculum suggestions such as student projects to encourage management skills. The PAC also encouraged student achievement strategies as well as students testing closer to graduation, presumably for licensure.

In its January 22, 2025 response to the Commission's November 26, 2024 Warning, ACAST provided PAC minutes which did not appear to include discussion of all required items required in *Appendix III – Program Requirements* with discussion of student achievement rates notably missing. Additionally, the school did not provide any of the other items such as an explanation of the school's program evaluation process, a list of the school's PAC members and qualifications, and a schedule of future meetings. Therefore, the Commission found that the school is out of compliance with *Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation*.

Once again, the Commission directs ACAST to submit the following:

- a. An explanation of the school's program evaluation process;

- b. Documentation to evidence the program evaluation process meets accrediting standards;
  - c. A list of the school's Program Advisory Committees ("PAC") and corresponding members;
  - d. Written and detailed minutes of all PAC meetings held in 2024 and 2025 that include:
    - i. A description of all members in attendance (i.e., titles and affiliations);
    - ii. An annotation as to which PAC members represent the employment community, and which are qualified to review delivery of distance education;
    - iii. The date, time, and location of the meeting(s); and
    - iv. A comprehensive and clear description of the review of and commentary made by PAC members in compliance with *Section II (A)(4)(b) & Appendix III, Substantive Standards, Standards of Accreditation*; the school is reminded that PAC review and comment activities must include all items outlined in *Appendix III, Substantive Standards, Standards of Accreditation*; and
    - v. Evidence to show that the school gives consideration to the recommendations of the PAC;
  - e. A schedule for future Program Advisory Committee meetings to be held in 2025; and
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
12. ACAST must demonstrate that qualified personnel orient, train, and assist students and faculty in the use of the learning resource system in a manner that supports learning objectives (*Section II (A)(6)(e), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that although the school has a dedicated library/learning resource system staff person, this individual is only on campus once per week and the school did not appear to have a designated individual or individuals to assist students when this person is not on campus.

In response to the June 23, 2024 OER the school provided an explanation that while the school did at one time have a dedicated librarian, that individual had recently passed away and the school is now actively searching for a full-time librarian. In addition, the school explained that students receive orientation to the LRS system as part of their orientation.

As part of the response to the Warning, ACAST stated that a job description for an LRS coordinator has been created but has not yet been posted. Additionally, the schools stated, "copy of the ad was requested" (January 22, 2025 ACAST Response, pg. 38) when directed to submit the job posting. It was not clear to the Commission from whom the school requested the ad or why the school was unable to provide it to the Commission. The school's response also lacked the requested documentation related to LRS orientation and training for students. As there appears to be no substantive progress in hiring an LRS supervisor and the school did not provide what was requested by the Commission, the school was found to be not compliant with *Section II (A)(6)(e), Substantive Standards, Standards of Accreditation*.

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

- a. An update on the hiring of a qualified person or people to supervise the LRS;
- b. If the position has been filled, documentation to support the hired individual's qualifications;
- c. If the position has not yet been filled, a job posting for the position outlining the required qualifications and experience as well as the job duties required;

- d. Documentation of orientation, training, and assistance provided for student and faculty in the use of the learning resource system;
  - e. Copies of any orientation/training materials for the students and faculty regarding the school's learning resource system; and
  - f. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
13. ACAST must demonstrate that the school has a process for student's to request a leave of absence, for the school to approve such a request, and that if a student does not return following a leave of absence the school will a) terminate the student and b) apply the school's refund policy in accordance with the applicable and published requirements (*Section VII (A)(3)(c)(i & iii), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school did consistently follow its policy to collect back-up documentation for students requesting a leave of absence in the following circumstances: serious medical illness/condition, death of a family member, call to active military, change in employment status, financial hardship, and emergency situations as required by the school's policy.

In response to the June 23, 2024 OER, the school noted there have not been any approved leaves of absence since the on-site evaluation and stated that:

*Due to the clock hour requirement in this training program and an FAA regulation that once more than 32 hours are missed in the course of study, the student will be unable to make up the time within the FAA-defined window of time outlined in the FAA operational specifications. To that end, this policy will be reviewed for a more appropriate alignment to the clock-hour burdens, and the college may instead utilize a Standard Period of Non-Enrollment. (July 23, 2024 ACAST Response pg. 49).*

However, the school did not provide further clarification regarding the clock hour requirement or details about the FAA defined window of time. In particular, ACCSC accredits the school's only program as a credit hour program and the Commission questioned whether this program should be a clock hour program based on the FAA requirements. The Commission noted its interest in decisions regarding a leave of absence or standard period of non-enrollment.

The Commission requested the school's current leave of absence policy highlighting any changes following the on-site evaluation along with the school's internal protocol for approving a leave of absence. The Commission additionally requested an explanation regarding the FAA's clock hour and makeup requirements and how the school's policies meet those requirements, an update on the utilization of a Standard Period of Non-Enrollment, and copies of forms for students who had requested a leave of absence or standard period of non-enrollment. The school provided its policy, an explanation of FAA requirements, and noted that the school did not receive any leave of absence requests. Given the Commission's previous questions, the Commission maintains its interest in the school documenting its implementation of its leave of absence and standard period of non-enrollment policies.

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

- a. The school's current leave of absence policy along with the internal protocol for approving a leave of absence, as applicable;
- b. An update on the utilization of a Standard Period of Non-Enrollment;
- c. Copies of completed forms for all students who have requested a leave of absence or standard period of non-enrollment, as applicable, since the school's January 22, 2025 response; 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 ACCSC's leave of absence requirements.

14. ACAST did not demonstrate that the school discloses the graduation rate, graduate employment rate, and as applicable licensure certification examination pass rate for each program offered as last reported to the Commission and that the disclosure for each program's graduation rate, graduation employment rate, and licensure/certification examination pass rate includes the program population base and timeframe upon which each rate is based (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). In the school's response to the OER, the school included a link to the consumer information section of the website where the school has posted the graduation and employment rates. However, the rates were not the same as those which the school has reported to the Commission.

In ACAST's January 22, 2025 response, the school again provided a link to the consumer information section of the school's website which displays the graduation and employment rates submitted in the 2024 Annual Report. However, as ACAST was directed to submit rates with this response, those more updated rates should have been displayed.

As such, the Commission directs ACAST to provide the following:

- a. A narrative outlining how the school determines the Graduation, Employment, and Licensure rates it discloses and ensures it remains current with each report submitted to the Commission;
  - b. Supporting documentation to show that the school currently discloses graduation and graduate employment rates as last reported to the Commission; and
  - c. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.
15. ACAST did not demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, or its accredited status (*Section IV (B)(1), Substantive Standards, Standards of Accreditation*). At the time of the on-site evaluation, the school's website did not include the phone number or email address for the Kissimmee campus. In the July 23, 2024 response the school noted that the website was previously shared with the Main campus location. Specifically, the school was in the process of changing the website and that the process was expected to take around 30 days.

In the school's January 22, 2025 response to the November 26, 2024 Warning, the school explained that the Kissimmee campus does not oversee the school's advertising the President and Vice President oversee all advertising. The school did not provide any updated advertising or promotional material as directed. Additionally, the school provided no update to the website for this campus.

As the school did not provide documentation as directed, the Commission has found ACAST out of compliance with *Section IV (B)(1), Substantive Standards, Standards of Accreditation*. Accordingly, the Commission directs ACAST to provide the following:

- a. A summary of a comprehensive review the school has completed related to all public facing advertising, including the school's website and social media pages, to ensure all pictures, claims, and statements are truthful and accurate to the programs and equipment offered at the branch location;
- b. A description regarding any actions taken (i.e. language removed, language revised, et.) by the school to address each of the claims the school discovered when reviewing advertising;

- c. Any updates made to policies and procedures pertaining to advertising/marketing/promotion of the school;
- d. Documentation of advertising and promotional materials to include the URL of the branch campus's website, links to the school's social media platforms; and copies of current advertising materials to reflect any revisions made by the school;
- e. Any additional information that the school believes will assist the Commission in determining the school's compliance with accrediting standards.

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### **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 (Section VII (L)(6) Rules of Process and Procedure, Standards of Accreditation)*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reasons for the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies.

### **TEACH-OUT PLAN REQUIREMENT:**

Given the serious nature of the issues outlined herein, the Commission directs the school to provide the following which must be submitted as part of the response for the items listed above:

- A completed ACCSC [Institutional Teach Out Plan Approval Form](#).

### **MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE**

According to *Section VII (M), Rules of Process and Procedures, Standards of Accreditation*, where the Commission has found an area in which the school is out of compliance with accreditation standards or requirements, the Commission allots the maximum timeframe for the school to remedy the noncompliance or cure the deficiency. Given the scope and range of the concerns cited herein coupled with the fact that the school is almost 24 months beyond its next accreditation date (June 2023), the maximum timeframe allowed for ACAST to achieve and demonstrate compliance with the *Standards of Accreditation* ends on **March 19, 2026** unless the school can demonstrate good cause exists to extend this timeframe pursuant to *Section VII (M)(2), Rules of Process and Procedures, Standards of Accreditation*.

Also, please be advised that pursuant to these *Rules*, the Commission is not required to allow the maximum time frame to remedy noncompliance in all instances. The Commission may establish shorter time frames as deemed appropriate, including taking immediate adverse action at its next meeting if the school does not

demonstrate significant improvement in its compliance with the accrediting standards cited in this letter *Section VII (M)(5), Rules of Process and Procedures, Standards of Accreditation*.

### **NOTIFICATION TO STUDENTS:**

Within **seven days** of receipt of the Probation notification and for the duration of that action, the school must:

- a. Inform current and prospective students in writing that the school has been placed/continued on Probation and provide such notice on the school's website;
- b. Provide a summary that accurately describes the reasons for the Probation; and
- c. Provide the uniform resource locator (URL) where that action can be obtained from the Commission's website.

The school must **within seven days** inform current and prospective students in writing that the school has been continued on Probation, provide a summary of the reasons for the Probation, and indicate where that action can be obtained from the Commission's website. (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*). As part of the school's response to this Probation, please provide a copy of the required notice provided to students.

### **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.

Aviator College of Aeronautical Science & Technology 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>4</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.

Aviator College of Aeronautical Science & Technology 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

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<sup>4</sup> ACCSC has resources for submitting a well-documented and organized response for Commission consideration. As a reminder *Section I (H)(1) Rules of Process and Procedure, Standards of Accreditation*, states that all submissions and notifications must be organized as required by the *ACCSC Instructions for Electronic Submission*. More information is available on the [ACCSC website](#) under [Resources](#) and [Forms and Reports](#).

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 June 13, 2025**. If a response, the required fee,<sup>5</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 13, 2025**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED]

Sincerely,

[REDACTED]

Executive Director

c: [REDACTED]

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<sup>5</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation.