



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
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December 13, 2018

VIA EMAIL & FEDERAL EXPRESS  
([paulb@rwmfiber.com](mailto:paulb@rwmfiber.com))

Mr. Paul Bonagura  
School Director  
RWM Fiber Optics, Inc.  
16627 South Avalon Blvd., Suite A  
Carson, CA 90746

***Re: Reaccreditation Denied  
(Appealable, Not a Final Action)***

***ACCET ID #1256***

Dear Mr. Bonagura,

This letter is to inform you that, at its December 2018 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to deny reaccreditation to RWM Fiber Optics, located in Carson, California.

The decision was based upon a careful review and evaluation of the record, including the institution's Analytic Self-Evaluation Report (ASER), the on-site visit team report (visit conducted October 4-5, 2017), and the institution's response to that report, dated November 25, 2017. It is noted for the record that the Commission originally considered institution's application for reaccreditation at its December 2017 meeting. At that time, the Commission voted to defer consideration for one cycle, continue the Show Cause directive issued in November 2017 based on the institution's financial status and Heightened Cash Monitoring 2 Status with the US Department of Education, and directed the institution to submit an interim report. Upon its review at its April and August 2018 meetings, the Commission voted to continue the Show Cause directive, defer consideration, and directed the institution to submit additional interim reports regarding significant issues of non-compliance relative to financial procedures, financial assistance, scholarships, enrollment, attendance, and records. The Commission notes that while the original team report classified these issues under three standards: III-B: Financial Procedures, III-C: Financial Assistance/Scholarships, and VIII-B: Attendance, the documentation provided by the institution in the team report response and subsequent interim reports also demonstrated significant issues under Standard II-D: Records, Standard III-A: Stability, and VII-B: Admissions/Enrollment, as represented in the consequent Commission Action Letters. Given the severity of these issues, the Commission advised the institution in its August 31, 2018 Commission Action Letter that it was to demonstrate its ability to ensure the systematic and effective implementation of written policies and procedures compliant with the requirements of federal and state authorities and ACCET Standards of Accreditation to maintain its accredited status. However,

as the findings below indicate, the institution failed to demonstrate systematic and effective implementation of compliant policies, procedures, and practices over time. Accordingly, the Commission determined that the institution has not adequately demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to the following Standards:

1. Standard II-D: Records

The institution failed to demonstrate that it has an organized record-keeping system that ensures all records are maintained in an accurate, orderly, and up-to-date manner.

The August 2018 Commission Action Letter required the institution to provide a narrative update and supporting documentation for six students to demonstrate accurate and consistent recordkeeping, including two students who appeared to have identical credits earned and days attended, but were listed as being in different payment periods. In addition, the institution was directed to provide a narrative and supporting documentation to demonstrate how it ensures that “possible clock hour” reporting is accurate for attendance-tracking purposes and how it determines percentage and completion of payment periods for Title IV purposes.

The institution did not respond to the directive regarding how it ensures that “possible clock hour” reporting is accurate for attendance-tracking purposes. This issue is further detailed under Standard VIII-B: Attendance, but the lack of response from the institution failed to resolve this issue regarding record keeping.

In response to the two students, [REDACTED] and [REDACTED], who appeared to have the same credits earned and days attended, but were listed in different payment periods, the institution’s interim report stated, “None of the documentation reviewed or attached indicate 24.28 possible units” for [REDACTED]. The Commission directs the institution’s attention to its own March 7, 2018 interim report on page 73, which contains an electronic record for [REDACTED] indicating “24.28 possible units.” The Commission directed the institution to resolve this discrepancy in the April 2018 Commission Action Letter, in response to which the institution provided no documentation and stated in its narrative, “no changes to the refund calculation were required for either of these students.” In this most recent interim report, the institution provided Leave of Absence forms for [REDACTED], significantly revised his refund calculation, and made adjustments to his R2T4 calculation. The institution’s delay of eight months between the original calculations for refund and R2T4 and the updated versions does not demonstrate transparent and accurate recordkeeping or appropriate administrative capability for administering refunds or Title IV funds.

The institution’s interim report included incomplete and inaccurate records for students. For example, the documentation provided for [REDACTED] in response to Standard III-B: Financial Procedures included two months of paper attendance records for a 2017 enrollment as well as an enrollment in 2018. However, no other records, including the student’s ledger and transcript, indicated enrollment in 2017, and only referred to the student’s 2018 enrollment. As noted below in Standard III-B: Financial Procedures, Standard VII-B: Admissions/Enrollment, and Standard VIII-B: Attendance, multiple student records contained conflicting and inaccurate information.

Concerns regarding the completeness and accuracy of records were an issue during the reaccreditation on-site visit and were included in the last three Commission Action Letters; the institution's most recent interim report does not demonstrate resolution of these issues.

The institution's interim report further failed to demonstrate a record-keeping system that provides accurate attendance records. In its narrative, the institution states that its attendance-tracking software does not distinguish between absences and days classes were not offered. The institution indicated that this distinction did not matter as, "it was obvious that suitable Friday make up hours and time on academics were offered and the student took full advantage of them." However, this is not an accurate record of attendance as further discussed in item #4, Standard VIII-B: Attendance. The institution's recordkeeping system, by its own description, results in an electronic record that reflects student absences on days when classes are not in fact offered, which is not an accurate record of attendance.

Therefore, the institution failed to demonstrate full compliance with this standard.

2. Standard III-A: Stability; Standard III-B: Financial Procedures; Standard III-C: Financial Assistance/Scholarships

The institution failed to demonstrate a record of responsible financial management with resources sufficient to provide quality education, training, and student services and to complete the instruction of all enrolled students; that tuition charges are applied fairly and consistently; that receipt of tuition payments and other monies is properly recorded and tracked; and that cancellation and refund policies are written, fair, and equitable; are consistently administered; and comply with statutory, regulatory, and accreditation requirements. The institution also failed to demonstrate that it ensures that any student financial assistance programs, including federal and state financial aid programs, institutional scholarships, and externally funded scholarships, are responsibly administered, governed by written policies and procedures, and in full compliance with relevant statutes and regulations.

The August 2018 Commission Action Letter required the institution to update its cancellation and refund policy and enrollment agreement to demonstrate compliance with ACCET Document 31 – Cancellation and Refund Policy and demonstrate that refund calculations are consistent with that policy, including alignment of the period of financial obligation across all documentation and a comparison with the state policy. The institution was also required to revise the enrollment agreement to itemize non-refundable charges and ensure that fees applied to the portion of the program attended by the student. Additionally, the institution was directed to provide evidence of corrected records and documentation for two students, and evidence of implementation of the aforementioned revised cancellation and refund policy through files for ten students withdrawn since the July 2018 submission.

The institution's submission failed to resolve these issues. The revised cancellation and refund policy states that the California BPPE policy is calculated using the "daily charge for the program

in the current payment period,” based on the number of days in the payment period, applied to the “number of days scheduled to attend,” and the revised enrollment agreement includes a table of payment periods for four programs, indicating that “all credit hour programs have more than one payment period.” The eight recently withdrawn student files provided by the institution included multiple refund calculation worksheets, all of which indicated that the institution used the total charge for the entire program as the basis for its calculations under the state policy. Of the three different worksheets provided, one indicated that the state withdrawal adjustment was “the amount of unearned charges for the period of enrollment;” another indicated that the percentage was based on “possible credit units;” and the third presentation indicates “Policy applies to entire course” and stated that the calculation was based on “elapsed time.” The Commission found that these worksheets reflected different results of monies earned by the institution, and in the case of the first worksheet, the result did not tie to the costs and percentages listed on the worksheet. The institution’s submission for each student included multiple refund calculation worksheets with different calculations, and none of these calculations indicate a daily calculation based on payment period, as required by the policy in the institution’s enrollment agreement.

In its interim report, the institution provided student ledgers for each student that reflected the second calculation listed above, even in cases where one of the other calculations was more favorable to the student, as in the case of ██████████, who had one worksheet resulting in \$4,858.50 unpaid tuition upon withdrawal, and a second worksheet listing \$4,064.24. The ledger for this student reflected a balance of \$4,858.50, the larger amount. The Commission noted for the record that neither of these calculations was consistent with the institution’s written policy.

Further, only one of the institution’s three different refund calculation worksheets indicated a calculation based on the ACCET policy, as directed in the August 2018 Commission Action Letter, and the calculations do not demonstrate understanding or compliance with the ACCET policy. For example, the calculation for ██████████ indicates “Refund Adjustment (ACCET)” is \$0. However, the student completed 50% of the payment period, which results in unearned tuition for that payment period based on ACCET policy. The Commission noted that all eight student files indicated “\$0.00” for the ACCET Refund Adjustment, even though four students had attended 50% or less of the payment period. This worksheet also contained blank or inaccurate Dates of Determination, a field required by ACCET Document 31 – Cancellation and Refund Policy and necessary to determine timeliness of refunds. Further, the institution did not demonstrate an accurate comparison of the ACCET and state policy to ensure that it processed the refund most beneficial to the student, as required.

The institution’s interim report included ledgers for ██████████ and ██████████, which indicated a significant credit, as the funding was paid in full, even though the ledger was updated over three months after the student was withdrawn. A hand-written note in the institution’s submission for these students indicated “no refund made,” yet based on the record it appears that a credit or refund was required.

Additionally, the institution did not demonstrate that it applies charges fairly and consistently. The institution provided documentation indicating that supply fees are charged for each payment

period; however, student ledgers consistently indicated that the institution charged students supply fees upon withdrawal for future payment periods. Additionally, in one case the institution charged a student more than the total supply fee for the program. The documentation provided for ■■■■■ indicated total program charges for supplies of \$525, divided equally across two payment periods. ■■■■■ withdrew in the first payment period; however, the ledger provided indicated that not only was he charged for the supplies for the second payment period, he was charged an additional \$262.50, for a total supply charge of \$787.50. These inconsistencies do not demonstrate the application of fair and consistent charges.

The institution's interim report provided a narrative and supporting documentation for ■■■■■ in response to a directive in Standard II-D: Records regarding the student's eligibility for Title IV funds. The narrative indicated that the documentation provided by the student, a foreign undergraduate transcript, was insufficient to demonstrate Title IV eligibility. The institution's narrative stated that, "RWM has removed the charges remaining on the student ledger as RWM was unable to provide documentation pursuant to admissions requirements." While the ledger did not reflect any previously-disbursed Title IV funds for this student, the supporting documentation included an R2T4 form dated 11/12/2018 indicating \$2,171 of Pell Grants that could have been disbursed for ■■■■■. As the narrative indicated that Title IV eligibility was not demonstrated for this student, it is not clear why there would be funds that could have been disbursed. Therefore, the institution did not demonstrate its capability to administer Title IV funds.

The institution's interim report provided financial statements demonstrating the institution's financial condition. The institution continues to be on Heightened Cash Monitoring 2 with the US Department of Education, and the financials provided indicated serious concern regarding cash flow and the ability of the institution to fund its operations.

Therefore, the institution failed to demonstrate responsible financial management, fair and consistent application of charges, systematic and effective implementation of an ACCET-compliant refund policy, and proper tracking and maintenance of student accounts as required. Further, the institution failed to demonstrate that it ensures that federal and state financial aid programs are responsibly administered and in full compliance with relevant statutes and regulations.

### 3. Standard VII-B: Admissions/Enrollment

The institution failed to demonstrate that the enrollment process is preplanned, effective, and regularly monitored by the institution to ensure its integrity.

The August 2018 Commission Action Letter required the institution to provide a narrative update and revised enrollment agreement that accurately provides start and end dates for the program of study, publishes clock hours representative of lecture, lab, and externship instructional hours, and length in credit hours.

The institution's interim report included a blank revised enrollment agreement with a single entry for a scheduled end date, removing the previous ambiguity of multiple end dates. However, the student documents provided demonstrated continued inconsistencies in recording the scheduled end dates for students. In its response to issues under Standard III-B: Financial Procedures, the institution provided an "enrollment addendum" for student [REDACTED], signed November 17, 2018, to retroactively change the student's program from full-time to part-time starting June 26, 2018. In addition to the issues inherent in retroactively changing a student's enrollment, the original enrollment agreement for the full-time program lists the expected end date as November 14, 2018. The "enrollment addendum" lists the "revised contract end date" as April 13, 2018, and the two refund calculation worksheets list the end date as February 21, 2019 and March 7, 2019, respectively.

Additionally, the institution's interim report included documentation indicating multiple enrollment agreements for a given student. The institution's interim report provided documentation for student [REDACTED] in its response to a request for a narrative updated and corrections to the record under Standard III-B: Financial Procedures. Upon review of this documentation, the Commission found that the enrollment agreement for [REDACTED] was different than the one provided by the institution previously. While the previous enrollment agreement reflected an enrollment in the Communications Technician 100 program, signed on January 29, 2018, the new enrollment agreement reflected enrollment in the Communications Technician 103 program, signed on December 18, 2017. The institution's narrative makes no mention of the previously-submitted enrollment agreement and does not provide a rationale for why there would be two separate enrollment agreements signed six weeks apart for the same student.

Therefore, the institution failed to demonstrate that its enrollment process is preplanned and monitored to ensure the integrity of the enrollment process.

4. Standard VIII-B: Attendance

The institution failed to demonstrate that it establishes and implements written policies and procedures for monitoring and documenting attendance; and that the attendance policy ensures that student attendance and participation are consistent with statutory, regulatory, and accreditation requirements, including at a minimum the required student attendance rate established by the Accrediting Commission.

The August 2018 Commission Action Letter directed the institution to: a) provide revised policies, procedures and supporting documentation to demonstrate the effective implementation of monitoring, tracking, and recording attendance data, and ensure that clock hours for out-of-class work are not counted for the purpose of attendance; b) provide a narrative and supporting documentation for four students with discrepant attendance records; and c) provide attendance documentation for five active students for the period August 1 – September 30, 2018.

The institution's interim report did not provide complete policies and procedures for monitoring, tracking, and recording attendance data. The institution provided student-facing policies for attendance, but included only a single paragraph entitled "Documentation of Classroom Attendance." The paragraph included a single sentence relative to monitoring and tracking attendance: "This manual attendance supported by the electronic file in the student information system ensures that each student file is reviewed for compliance with the policies." The institution did not demonstrate which staff are responsible for reviewing attendance information, how often this review occurs, nor what processes are followed if there is an issue. The documentation provided by the institution in its interim report relative to attendance only included paper and electronic attendance records, as well as "Notice of Refund" forms that included total clock hours and days attended, for which discrepancies are detailed below. No supporting documentation was provided to evidence the institution's process for monitoring or tracking attendance data to demonstrate compliance with ACCET's 80% minimum attendance requirement.

The institution's interim report continued to reflect inaccurate attendance records. Paper attendance records did not match electronic records, and in some cases, electronic records were inconsistent and contradictory. For example, the documentation submitted for ██████ in response to Standard III-B included two copies of electronic attendance printed one day apart, over three months after the student was withdrawn. The record as of 11/16/18 indicated that ██████ received full attendance on July 3, 5, and 6, 2018; however, the record as of 11/17/18 indicated that the student was absent for those three days, consistent with the paper record.

The institution's interim report indicates "total scheduled hours" on the "Notice of Refund," the only documentation provided that includes this information. The Commission found that these total scheduled hours were not consistently correct and could not be used to determine attendance percentages in compliance with ACCET attendance requirements. For example, the documentation for ██████ indicates that the student began as a full-time student and transitioned to a part-time program. However, the 258 "total scheduled hours" listed on the "Notice of Refund" reflect the total possible hours if the student had been consistently enrolled in a part-time program, or 14.33 hours over 19 weeks, instead of representing six weeks of 29 hours and 13 weeks of 14.33 hours.

The institution failed to demonstrate that it accurately and consistently follows its maximum consecutive absence policy. For example, the institution's interim report contains attendance records for ██████ in its response to Standard III-B: Financial Procedures, which document three consecutive weeks of absence, from June 29 - July 21, 2018, with no corresponding Leave of Absence documentation. The student attended an additional week after these three weeks of absence, with a Last Date of Attendance of July 30, 2018.

The institution failed to demonstrate that it accurately and consistently follows an attendance policy compliant with ACCET standards and ACCET Document 35 – Policy on Attendance Requirements. The institution's interim report states in reference to ██████ and ██████, "the student did attend >80% of the 'clock' hours converted into credit hours during their attendance," which does not comply with ACCET policy. The institution was previously directed

to ensure that its attendance policy reflects instructional hours; however, the institution continues to indicate that it considers credit hours, not instructional clock hours, when determining attendance percentages. This is also reflected on the institution's refund calculation worksheet, which as indicated above, is the only document that provided total scheduled clock hours. The document continues to indicate that the "total possible clock hours" for enrollment is a total that includes homework hours, not the instructional hours approved by ACCET. The institution did not demonstrate that its attendance record is sufficient to ensure that student attendance is consistent with the required student attendance rate established by ACCET.

Further, the institution indicates in its narrative response submitted for ██████████ that "being absent on a date in which the campus had a late start is not relevant to the fact that the student was absent on that date." However, the August 2018 Commission Action Letter specifically states in reference to ██████████, "the Commission was unable to determine the number of clock hours missed, or the hours needed to be made up for that date." The institution has not resolved this concern, as the number of hours missed for that absence is directly relevant to the amount of hours required to be made up. The assertion of the institution that this information is not relevant indicates serious misunderstandings about the importance of recording hours present and missed for attendance purposes.

The institution's interim report dismissed the Commission's concern regarding the inability of its attendance-tracking software to distinguish between absences and days classes were not offered, stating that "it was obvious that suitable Friday make up hours and time on academics were offered and the student took full advantage of them." The Commission notes that this system holds the student accountable for making up hours that the institution has not provided. It is the institution's responsibility to ensure it schedules the full instructional hours of the program and follows the class schedule provided in the enrollment agreement and catalog, and ensures that appropriate substitute instructors are procured in the event of an instructor absence. The Commission further notes that recent attendance records for ██████████ reflected a two-week period from September 17-26 of seven classes dedicated to make-up classes for specific dates labeled "no class" in August and September: August 6-9, August 13, September 3, and September 12. The electronic record for this student reflects both an absence for the original date as well as hours and/or absences for the make-up dates, inflating the amount of scheduled class hours recorded as well as doubling the amount of hours missed when the student was absent for the make-up class.

Therefore, the institution failed to demonstrate a sound policy and systematic and effective implementation of an accurate attendance recordkeeping system.

Since denial of reaccreditation is an adverse action by the Accrediting Commission, the institution may appeal the decision. The full procedures and guidelines for appealing the decision are outlined in Document 11, Policies and Practices of the Accrediting Commission, which is available on our website at [www.accet.org](http://www.accet.org).

If the institution wishes to appeal the decision, the Commission must receive written notification

no later than fifteen (15) calendar days from receipt of this letter, in addition to a certified or cashier's check in the amount of \$8,500.00, payable to ACCET, for an appeals hearing. This notification must be accompanied by an affidavit signed by an authorized representative of the institution indicating that a Notice of Status of Accreditation notifying interested parties of the Commission's adverse action has been disseminated to new enrollees and posted in conspicuous places at the institution to include, at minimum, the admissions office and student lounge or comparable location. In addition, the institution must submit a written teach-out plan that is in accordance with ACCET Document 32 – Closing/Teach-Out Policy.

In the case of an appeal, a written statement, plus six (6) additional copies regarding the grounds for the appeal, saved as **PDF documents and copied to individual flash drives**, must be submitted to the ACCET office within sixty (60) calendar days from receipt of this letter. The appeal process allows for the institution to provide clarification of and/or new information regarding the conditions at the institution at the time the Accrediting Commission made its decision to deny or withdraw accreditation. The appeal process does not allow for consideration of changes that have been made by or at the institution or new information created or obtained after the Commission's action to deny or withdraw accreditation, except under such circumstances when the Commission's adverse action included a finding of non-compliance with Standard III-A, Financial Stability, whereupon the Appeals Panel may consider, on a one-time basis only, such financial information provided all of the following conditions are met:

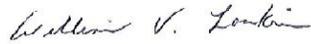
- The only remaining deficiency cited by the Commission in support of a final adverse action decision is the institution's failure to meet ACCET Standard III-A, Financial Stability, with the institution's non-compliance with Standard III-A the sole deficiency warranting a final adverse action.
- The financial information was unavailable to the institution until after the Commission's decision was made and is included in the written statement of the grounds for appeal submitted in accordance with the ACCET appeals process; and
- The financial information provided is significant and bears materially on the specified financial deficiencies identified by the Commission.

The Appeals Panel shall apply such criteria of significance and materiality as established by the Commission. Further, any determination made by the Appeals Panel relative to this new financial information shall not constitute a basis for further appeal.

It remains our hope that the accreditation evaluation process has served to strengthen your institution's commitment to and development of administrative and academic policies, procedures, and practices that inspire a high quality of education and training for your students.

RWM Fiber Optics, Inc.  
December 13, 2018  
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Sincerely,



William V. Larkin, Ed.D.  
Executive Director

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