



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING
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August 21, 2013

VIA EMAIL & FEDERAL EXPRESS
(petra.rios@franklincareercollege.com)

Ms. Petra Arredondo – Rios, Director
Franklin Career College
1274 Slater Circle
Ontario, CA 91761

***Re: Accreditation Withdrawn
(Appealable, Not a Final Action)
ACCET ID #1148***

Dear Ms. Arredondo – Rios;

This letter is to inform you that, at its August 2013 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) voted to withdraw accreditation from Franklin Career College, located in Ontario, California, with a branch campus in Norwalk, California. The decision was based upon a careful review and evaluation of the record during an extended period under Institutional Show Cause status, initiated at the December 2011 Commission meeting, during which the institution failed to demonstrate why its accreditation should not be withdrawn. Included in this determination, the Commission reviewed the Change of Ownership report (visit conducted May 10, 2011), the response to that report, dated June 15, 2011, the Quality Assurance Unannounced Visit (QAV) report (visit conducted February 10, 2012); the institution's response to that report, dated February 28, 2012; along with a series of interim reports directed in Commission action letters, beginning with the August 2011 Commission meeting, through the institution's latest interim report, received on July 1, 2013, submitted in response to the April 2013 Commission action letter, dated April 26, 2013. Throughout this period of time the Commission provided a clearly focused direction and opportunity for the institution to come into compliance, for which it provided minimal progress and consistently unsatisfactory responses to the Commission's serious concerns related to the institution's failure to systematically and effectively implement policies and procedures in practice over time to demonstrate the essential achievement required of a vocational institution to competently select, train, and assist students whose preparations lead to successful job placement consistent with ACCET benchmarks.

Upon its review, the Commission determined that one of the findings cited in the April 26, 2013 Commission action letter was adequately addressed in the response; however, the institution has not demonstrated compliance with respect to ACCET standards, policies, and procedures, relative to Standard VIII-E: Completion and Placement as follows:

The institution did not provide an effective means to regularly assess and document the quality of the education and training services provided relative to completion and placement rates in a systematic and effective manner in practice over time. The institution cannot

validate the quality of the education and training services provided due to significantly below – benchmark placement rates as established by the Accrediting Commission.

The Commission action letter, dated April 26, 2013, required the institution to provide a comprehensive narrative update related to revised policy and procedures, and supporting documentation, demonstrating the systematic and effective implementation of tracking and monitoring of completion and placement statistics, including the accurate use of ACCET reporting documentation, in practice over time. The narrative update was to include a plan of action that immediately and substantively remedied the monitoring and tracking errors that continue to be an inherent characteristic of the institution's operations, as evidenced in the April 2013 review of the institution's completion and placement statistics.

In its response to the interim report, the institution hired a new School Director who has developed a corrective action plan agenda related to the institution's operations; however, the institution failed to demonstrate systematic and effective implementation of any of the initiatives described in the response. The institution's response does not include evidence of implementation, expected timelines, or method for evaluation. Further, the response does not address with any detail or substance the central issue facing the institution, which is the lack of systematic and effective implementation of policy and procedures related to the tracking and monitoring of completion and placement outcomes in practice over time. By way of example, a review of the institution's completion and placement statistics and supporting documentation, including the On – Site Sampling Verification: Completion, Placement, and Academic Data form (OSV), submitted in its response to the Commission action letter, dated April 26, 2013, noted the following errors for all programs and both campus sites for calendar year 2012: four placements claimed by the institution were discounted by the Commission for failure to meet the ACCET definition of full time employment, with the term of employment being less than the required 30 day period and/or the verification of employment occurring prior to the 30 day period of employment, which are out of compliance with the requirements of ACCET Document 28. In four cases, the institution's data, as presented on the respective OSV, did not correlate with the data presented on the corresponding ACCET Document 28.1 – Completion and Placement Statistics. In three cases, the placement was discounted due to incomplete verification documentation, with placements claimed by the institution missing crucial verification documentation such as a self – employed attestation, part – time attestation or a continuing employment attestation. These results directly undermine the statement of confidence made by the new School Director in reference to the institution's reporting abilities and competencies and reinforces the Commission's lack of confidence in the institution's ability to effectively and accurately track and monitor placement outcomes. It is noted for the record that this is but the latest error-ridden completion and placement data set submitted by the institution, beginning with the Commission's review in August 2011, which included five placements that were discounted due to non-training related placement; the December 2011 meeting, which had seven placements that were discounted due to non – training related employment and/or failure to fulfill 30 days of continuous full – time employment; the December 2012 meeting had 49 placements which were claimed by the institution discounted by the Commission, and the April 2013 meeting where seven cohorts

of OSV data went unreported by the institution, and an additional six discrepancies were noted between the OSV data and the correlating Document 28.1.

Additionally, the April 2013 Commission action letter required the institution to provide updated Document 28.1s – Completion and Placement Statistics, for calendar year 2012, for all programs at both campuses, together with full supporting documentation for all placements and waivers referenced to completed copies of the attached OSV for each Scheduled to Graduate (column 3) cohort on the respective 28.1s to be submitted with the response.

In its response to the Interim Report, the institution provided updated Document 28.1s – Completion and Placement Statistics, for calendar year 2012, for all programs at both campuses, together with full supporting documentation for most placements and waivers referenced to the attached OSV for each Scheduled to Graduate (column 3) cohort; however, as previously noted, the data and supporting documentation provided by the institution were, in some cases, incomplete and, in other cases, incorrect. Further, the statistics and documentation provided resulted in the following significantly below benchmark rates for placement for calendar year 2012:

Medical Billing and Coding:

Ontario Campus: Placement = 42.86% (7 eligible/3 placed)

Norwalk Campus: Placement = 14.29% (14 eligible/2 placed)

Clinical Back Office Medical Assistant:

Ontario Campus: Placement = 42.86% (7 eligible/3 placed)

Norwalk Campus: Placement = 27.78% (18 eligible/5 placed)

Licensed Vocational Nurse:

Ontario Campus: Placement = 34.21% (38 eligible/13 placed)

Therefore, the Commission has determined that the institution has continuously failed to demonstrate effective implementation and observable results related to this mission critical standard.

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.

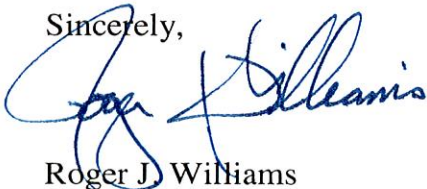
If the institution wishes to appeal the decision, the Commission must receive written notification no later than fifteen (15) calendar days from receipt of this letter, in addition to a certified or cashier's check in the amount of \$7,500.00, payable to ACCET, for an appeals hearing. This notification 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.

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.

Sincerely,



Roger J. Williams
Executive Director

RJW/eyl

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