



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
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December 23, 2014

VIA EMAIL  
(robertom@rwmfiber.com)

Mr. Roberto Munoz  
Associate Director/Compliance  
RWM Fiber Optics, Inc.  
16627 South Avalon Blvd., Suite A  
Carson, CA 90746

***Re: Reaccreditation Deferred;  
Institutional Show Cause Issued;  
Interim Report Required  
ACCET ID #1256***

Dear Mr. Munoz:

At its December 2014 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) considered the application for reaccreditation of RWM Fiber Optics in Carson, California, the on-site visit team report (visit conducted September 30 – October 1, 2014), and the institution's response to that report, dated November 18, 2014). As a result of its review, the Commission voted to defer further consideration, and to continue the institution's accredited status pending further review at its April 2015 meeting. In addition, the Commission voted to issue an Institutional Show Cause directive, requiring the institution to show cause why its accredited status should not be withdrawn, based on the numerous weaknesses that remain unresolved following the on-site visit and response, as well as the institution's 2011 federal student loan default rate of 44%. While the institution's response adequately addressed a few of the weaknesses raised in the on-site team report, the following issues are in need of further clarification and/or resolution relative to ACCET standards, policies, and procedures:

1. Standard II-A, Governance

The team report indicated that an instructor filed a lawsuit against the institution concerning employment status (part-time versus independent contractor), and the institution was advised to inform ACCET of any developments in the lawsuit. Further, the report stated that the clock hours for the Communications Technician 103 program did not agree among approvals from ACCET, BPPE, or DOE.

*The institution corrected the issue related to program hours in separate correspondence with ACCET staff. Regarding the lawsuit, the response indicated that the institution "vigorously disagrees with the allegations" and has engaged legal counsel. The response noted that the institution will keep ACCET informed of the status of the case.*

**Therefore, as no change to the status of the case has occurred, the institution is directed to provide a narrative update on this issue with appropriate supporting documentation upon any change in or resolution of the case.**

2. Standard II-B, Operational Management

The team report indicated that the institution's job descriptions were not clearly defined, and that the Placement and Student Services and Financial Aid/Instructor positions did not include written job descriptions. The report stated that the organizational chart was unclear as to who had responsibility for Financial Aid, as the chart included a Financial Aid/School Compliance position, a Financial Aid position, and a F/A Disbursement Officer.

*The institution indicated in its response that it is a small business and, as such, "many of its daily functions are performed by the available personnel which are trained to perform certain duties but are the ultimate responsibility of applicable management personnel." The response stated that job descriptions are intended for a position but are "not intended to detail each specific daily duty" and that, as a small school, the institution cross-trains its staff. A general description of the duties of the staff who work in financial aid was provided. However, the institution did not explain what it believes should be on a job description, if not the specific duties of that position, nor did it provide copies of job descriptions for the staff members referenced in the weakness as missing these.*

**Therefore, the institution must provide a narrative update on this issue, including copies of job descriptions for all current positions referenced to a copy of the most updated version the organizational chart, which must note clear lines of reporting for all positions.**

3. Standard II-C, Personnel Management; Standard II-D, Records

The team report indicated that, in some personnel evaluations, review ratings and narrative performance measurements were identical across individuals with different positions, and in one instance, a staff member performed the annual performance review on another who was not a direct report. The report noted that instructors Meeks and Collier were not on ACCET Document 21 - On-Site Personnel File/Qualifications Checklist, but were listed on the organization chart, and certain positions did not match between these two documents (i.e. A. Reid, Registrar/Administrative Assistant versus Registrar/Office Assistance/ F/A Disbursement Officer, and S. Cohen, Administrative Assistant versus Placement Assistant and Student Services Assistant). The team report stated that the institution was converting R. Munoz, K. Moran, J. McConnell, and A. Reid from independent contractor status to employees, and their files were incomplete, lacking offer letters and job descriptions.

The report further indicated that all employees were noted as full time on the On-Site Personnel File/Qualifications Checklist, but that almost all faculty were part-time. Similarly, R. Munoz was full time on the Document 21, but his ACCET Document 6 – Faculty/Administrative Personnel Form noted that he was part time. Lastly, the team found that personnel files for W.

Thomas, R. Munoz, J. Perez, S. Lewis, S. Cohen, A. Reid, K. Moran, and J. McConnell were incomplete, and indicated the missing information for each.

*The institution indicated in its response that it disclosed information accurately per the directions noted on ACCET Document 21 and also per the Preparation Checklist for ACCET On-Site Evaluation Visits. The response noted that the team reviewed all personnel files, even those for inactive instructors Meeks and Collier, and that this was not the “random sampling as is normally performed or even as described in the email leading up to the On-Site evaluation,” It asserted that the files were also accurately disclosed. As for the missing job descriptions, the response noted that this was addressed in its response to Standard II-B, Operational Management, and reiterated that it is a small organization and that daily functions are performed by many personnel who are trained in these areas and report to appropriate managers. It further indicated that R. Munoz is part-time but was working full-time from September – December 2014 to support the Owner. It noted that job descriptions do not indicate full- or part-time, and that the differences in the names of job titles “are actually only semantic in terminology of the position.” The response addressed some of the items noted by the team as missing on the Document 21, including copies of the certificates for the March 28 in-service and copies of corrected I-9’s.*

*However, the response did not address the issue noted relative to performance evaluations and the management staff designated to perform them. As to the different job titles being “semantic in terminology”, the Commission finds this issue to be demonstrative of the overall disorganization of the institution’s records and not merely a case of “semantics”. Further, it remains unclear as to which staff/faculty are part-time and which are full-time, and the response did not address each missing item cited by the team on the Document 21, as enumerated below.*

**Therefore, the institution must provide a narrative update on these issues, including an update on the employment status of the staff members noted above who are being transitioned from contractors to employees. The institution must provide an updated ACCET Document 21 - On-Site Personnel File/Qualifications Checklist, with full/part time status marked and in which the job titles clearly match those on the revised organizational chart. It must submit a copy of its policy and procedures for conducting annual evaluations, with a narrative explanation as to why staff were evaluating fellow employees. Finally, the institution is directed to submit the following documents and information: 1) date of employment for W. Thomas; 2) a copy of the most recent classroom observation and formal evaluation conducted by the appropriate supervisor for J. Perez, along with her ACCET Document 6; and 3) a completed Document 6 for S. Cohen.**

4. Standard II-D, Records

The team report indicated that copies of student records with personal information (social security numbers and financial information) were left on the copier/printer in a central room and that students passed the copier going to class.

*The institution stated in its response that it takes the confidentiality of student information serious and that a meeting was held to address the importance of security of information. The response also indicated that the institution is expanding its current space and that, following the expansion, the printer / copier will be located in administrative areas. However, the institution did not provide minutes from the meeting or any update to its FERPA policy to ensure that student information is kept safe.*

**Therefore, the institution must provide a narrative update on this issue, including a copy of the minutes from the aforementioned meeting on student data security, or in lieu of that, an email/memo sent to staff and faculty reiterating the topics of the meeting. The response should also include the institution's written policies and procedures covering FERPA and student data security.**

5. Standard III-B, Financial Procedures

The team report indicated that no formal training was provided to A. Reid, the Registrar/Office Assistant, who was also performing financial aid duties.

*The institution indicated in its response that A. Reid was given training by the institution's financial aid processor, but no certificate was provided. No other information on her training was provided in the response, although the institution provided a description of the duties of the staff who are responsible for financial aid processing at the institution.*

**Therefore, the institution must provide documentation of formal training in financial aid processing for A. Reid.**

6. Standard III-C, Financial Aid

The team report indicated that the federal student loan default rate for 2011 is 43.3%, noting that the institution indicated that a default management plan had been implemented with assistance from the financial aid processor. The 2012 default rate had not been released at the time of the on-site visit.

*The institution included a copy of its default management plan in its response, and indicated that it has had default management team meetings. The institution stated that it contracted a third party servicer to assist with compliance in this area, and that it has increased its advising and counseling efforts, providing outreach and directly contacting graduates. The response indicated that the financial aid processor projected that the 2012 three-year default rate will be under 18%. However, no documentation of meetings, increased counseling and advising efforts, or the third-party servicer's projections was provided. More crucially, according to CFR 668.206, a 2011 cohort default rate above 40% is cause to terminate an institution's participation in Title IV, HEA programs, except under certain cases of appeal or adjustment, and no information regarding adjustments or plans for an appeal was included in the institution's response. It is noted that ACCET staff contacted the institution on December 3,*

*2014 and confirmed through a follow-up email from the institution, received December 3, 2014, that it had already submitted its “Economically Disadvantaged Appeal” of the default rate.*

**Therefore, the institution must provide a narrative update on this issue, including documentation to evidence the systematic and effective implementation of its default management plan. In addition, the institution is advised that, as indicated in ACCET Document 48 – Policy on adverse Actions and Other Negative Actions by Federal, State, and Other Accrediting Agencies, the institution must submit any notifications or actions from the U.S. Department of Education relative to this issue within 10 days of receipt. The institution must provide the three-year cohort default rate for 2012 as soon as part of this interim report, or as soon as it is released if not available by the report due date. It is further noted by ACCET staff that the institution provided documentation from the U.S. Department of Education, dated December 16, 2014, indicating that the institution’s appeal was successful. As this information was submitted after the Commission meeting, the institution is directed to provide this information as part of its interim report for review at the April 2015 Commotions meeting.**

7. Standard V-D, Facilities

The team report indicated that the County of Los Angeles fire department had not issued a new certification report to the institution since the old report expired in 2012.

*The institution indicated in its response that, despite several requests, the county has not provided the documentation of the inspection conducted in March 2014, and that the institution would update ACCET as soon as it obtains the documentation.*

**Therefore, the institution must submit a copy of the fire inspection documentation from the county. If the report includes any citations, the institution must also provide evidence of corrective actions taken to address them.**

8. Standard VI-C, Instructor Orientation and Training

The team report indicated that outside professional development activities often had no documentation of employee participation.

*The institution indicated in its response that it acknowledged the lack of documentation of outside professional development for its faculty and promised to “make a greater effort to detail the documentation” of these activities. However, no evidence of recent professional development activities was provided in the response.*

**Therefore, the institution must provide a narrative update on this issue, including documentation in the form of registration forms/conformations or certificates, for all**

**outside professional development activities for the period October 1, 2014, through February 15, 2015.**

9. Standard VIII-D, Sponsor/Employer Satisfaction

The team report indicated that employer feedback was difficult to verify because certain information is not included on the survey document template, including the name of the graduate, date of the evaluation, and name of the employer.

*The institution indicated in its response that the employer survey forms “are intended to be generic” and may be submitted anonymously, which is by design rather than an error as cited by the team. The different style samples resulted from the varying means of submittal: by fax, by email, by hand, through the website. The response stated that the feedback can be clearly read, and that the supporting documentation in the team report supports the institution’s argument. In addition, the response indicated that surveys are solicited for each student, and all surveys are reviewed internally quarterly and externally twice a year with the Program Advisory Committee. However, the Commission found the information on the surveys difficult to interpret, and the institution’s brief narrative did not provide sufficient clarification of the 0’s and 1’s on the survey form compared against the survey template questions, all of which had four possible responses. The only clear data were the comments at the bottom of the form.*

**Therefore, the institution must provide a clear and comprehensive narrative update on this issue, including copies of all surveys sent and received since the submission of the response to the on-site team report, correlated to the appropriate accompanying ACCET 28.1’s. The response should include the institution’s analysis of the survey data, along with an explanation of its interpretation of the 0’s and 1’s. Further, the institution must submit meeting minutes or other notes demonstrating any action taken as a result of the analysis.**

10. Standard VIII-E, Completion and Placement

The team report indicated that the Communications Technician 103 program has a placement rate of 54.17% (24 eligible/13 placed) for calendar year 2014(January-May). It also indicated that the institution’s placement verification form does not include dates and signatures of those adding information. Finally, the team report stated that three placements were discounted, although these did not bring the overall year-to-date placement rates below the 70% ACCET placement benchmark.

*The institution provided updated placement data for the Communications Technician 103 program showing a 70.83% placement rate (24 eligible/17 placed). The institution indicated that many staff use the placement verification form to update information, and that “completed by” names would be confusing. In addition, the institution provided information for two of the three discounted placements. While the Commission accepted the institution’s response for these cited items, it noted that information for the third discounted placement, R. Sanchez, was not provided.*

**Therefore, the institution must provide an update on the status of R. Sanchez, a graduate of the Communications Technician 101 program, including a copy of his placement verification form evidencing 30 days of training-related employment. If such information is not available by the interim report submission date, the institution is instructed to remove R. Sanchez from its placement totals and submit a revised ACCET Document 28.1 for the program.**

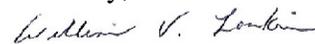
A copy of this report, including the attached interim report cover sheet, must be emailed to [interimreports@accet.org](mailto:interimreports@accet.org) no later than **February 27, 2015**.

As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at [www.accet.org](http://www.accet.org).

Deferral of reaccreditation is not an adverse action and is explained in ACCET Document 11 - Policies and Practices of the Accrediting Commission, which is available on our website at [www.accet.org](http://www.accet.org). The deferral of a final decision is intended to allow for an opportunity to clarify and resolve the areas of concern cited above, specifically focused on the demonstration of systematic and effective implementation of policies and procedures in practice, over time. In accordance with Commission policy, no substantive changes including, but not limited to, new programs or major program revisions, new branch campuses or other new sites, and/or relocation out of the general market area, will be permitted during the term of the deferral period.

Your demonstrated capabilities and commitment in support of the institution's accredited status are essential to a favorable outcome in this process. Should you have any questions or need further assistance regarding this letter, please contact the ACCET office at your earliest opportunity.

Sincerely,



William V. Larkin, Ed.D.

Executive Director

WVL/sef

Enclosures: Interim Report Cover Sheet

CC: Mr. Herman Bounds, Chief, Accreditation Division, USDE ([aslrecordsmanager@ed.gov](mailto:aslrecordsmanager@ed.gov))  
Ms. Martina Fernandez-Rosario, ACD - San Francisco/Seattle, USDE ([martina.fernandez-rosario@ed.gov](mailto:martina.fernandez-rosario@ed.gov))  
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