



ACCREDITING COUNCIL FOR CONTINUING EDUCATION & TRAINING  
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May 1, 2018

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;  
Interim Report Reviewed;  
Institutional Show Cause Continued;  
Final Program Approval Deferred;  
Interim Report Required  
ACCET ID #1256***

Dear Mr. Munoz,

At its April 2018 meeting, the Accrediting Commission of the Accrediting Council for Continuing Education & Training (ACCET) reviewed the institution's interim report submitted in response to the December 13, 2017 Commission Action letter, as a result of its review of the application for reaccreditation (visit conducted on October 4 – 5, 2017). The Commission's December 2017 action extended the institution's accredited status, and directed the institution to submit an interim report regarding issues relative to Standard III-B: Financial Procedures and III-C: Financial Assistance/Scholarships; Standard VI-B: Supervision of Instruction; Standard VI-C: Instructor Orientation and Training; Standard VIII-B: Attendance; and Standard IX-D: Completion and Job Placement.

Upon its review of the institution's interim report received March 7, 2018, the Commission voted to extend the institution's accredited status until August 2018, continue the Show Cause directive, defer final program approval for the Private Security Guard program, and defer further action pending receipt of additional information. The institution is advised that the Commission has serious concerns regarding the institution's processes for student finances and financial aid, attendance, and job placement. Significant effort is needed to demonstrate compliance with these ACCET standards and policies.

Toward that end, the Commission directed the institution to submit an interim report to include the following specific items:

1. Although the institution's refund calculation worksheets indicate that multiple policies may be used when calculating the refund, they do not demonstrate a comparison between the ACCET policy and the state policy, as required. The worksheet lists the policy used, but does not demonstrate that the policy used results in the most beneficial refund to the student. Additionally, many of the worksheets indicate that the BPPE policy is used, but also include a \$100 withdrawal fee. It is the Commission's understanding that BPPE policy does not include the allowance of a withdrawal fee.

The refund calculation worksheets did not appear to reflect ACCET policy for students who cancel. The worksheet for D. Flowers, a cancellation during the institution's trial period, indicated that the institution charged the student for books, supplies, and certification fees. However, ACCET policy clearly indicates that for cancellations after the start of class, in an optional student trial period, the student "must have all charges refunded and all payments returned to the individual or the applicable funding source less the maximum allowable application/registration fee of \$200," and the policy does not allow for retention of further fees.

Additionally, refund worksheets did not consistently include accurate information. For example, the refund calculation worksheet for L. Arguello did not demonstrate accurate calculations, as the worksheet indicated that the student had 212.80% of the program completed. The refund worksheet for A. Hayward indicated that the refund was calculated based on a 1,050-clock hour program; however, the enrollment agreement indicates that the student was enrolled in an 840-clock hour program.

**Therefore, the institution must provide a narrative update on this issue, to include:**

- a. **Internal policies and procedures for financial reconciliation for cancelled and withdrawn students, to include internal policies and procedures for refund calculations, R2T4 calculations, ledger reconciliations, and refund processing.**
- b. **A comprehensive review of the fifteen students provided in the institution's interim report to ensure that refund calculations have correct enrollment and attendance information, along with any revised refund calculations.**
- c. **An updated refund calculation worksheet that clearly documents how the determination as to which policy to use for processing the refund to ensure that it is the most beneficial refund for the student. Additionally, the institution must clarify the inclusion of a withdrawal fee in its refund calculation to ensure that it meets the requirements of BPPE refund requirements.**
- d. **Documented evidence of refunds accurately calculated, appropriately documented, and processed on or behalf of at least five withdrawn, dropped, or cancelled students since April 2018. For each of the five students, the institution must submit all supporting documentation, including: a) the enrollment agreement; b) documented**

**proof of high school graduation or its equivalency; c) student ledger; d) attendance records; e) R2T4 worksheet and proof of any return; f) refund calculation worksheet and proof of any refund; and g) any other documentation necessary to validate the refund, such as program change documentation or leave of absence forms.**

2. The institution provided Return to Title IV documentation for fifteen students in its interim report. The Commission found that T. Staples appeared to have incorrect R2T4 documentation. The student's last date of attendance on the R2T4 form, listed as May 26, 2017, did not align with the electronic attendance record, which indicates the student's final day of attendance was May 15, 2017. Additionally, there were two R2T4 worksheets for T. Staples, for Payment Period 1 and Payment Period 2. The Commission questions the calculations in these worksheets, which indicate that Payment Period 1 was only 91.2% complete, but that the student had also completed 63.8% of Payment Period 2. The Commission also notes that the start and end dates for these Payment Periods overlap, indicating that the student was simultaneously in two Payment Periods.

Additionally, the Commission found that the documentation for A. Hayward and D. Smith demonstrated identical attendance and scheduled clock hours for the same program. However, the Return to Title IV documentation indicated that A. Hayward was in Payment Period 2 while D. Smith was still in Payment Period 1.

**Therefore, the institution must provide a narrative update on this issue, to include:**

- a. **A narrative explanation and supporting documentation for T. Staples, A. Hayward, and D. Smith to demonstrate review and correction of any errors concerning the return of federal funds for these students.**
  - b. **Policies and procedures demonstrating how payment periods are determined and how the institution determines completion of a payment period to align with federal regulations.**
3. The institution provided partial enrollment agreements for fifteen students in its interim report, which demonstrated a number of serious issues with representation of funding and administration of institutional scholarships. Almost all the enrollment agreements indicated that students had paid a portion of the tuition, either through Pell grants, WIA, or other funding, leaving a balance significantly less than the program cost. However, the representation of these funds as "paid" does not accurately reflect the payments on the student ledger. These funds are not paid upfront, but earned as the student completes the program, such that a student who withdraws may end up owing more money than the actual "balance due" indicated on the enrollment agreement. For example, J. Vazquez's enrollment agreement indicates that the "total charges the student is obligated to pay upon enrollment" is \$15,550, but "less amount paid" \$5,920, for a balance due of \$9,630. However, the refund worksheet for J. Vazquez indicates a total unpaid tuition of \$10,037.26, which does not reflect those payments.

Additionally, many of the institution's enrollment agreements included loan information, which appeared to be a partial representation of federal loans, but did not add up correctly and did not easily explain a student's actual financial obligation. For example, the chart for D. Flowers indicates that the student has financed \$9,500, plus a finance charge of \$2,233.60, for total payments ("amount you will have paid after all payments") of \$11,833.60. However, the last box then states "total sales price – the total cost, including down payment" of \$15,550. It is not clear what the purpose of this price is, as it is identical to the estimated total for the program listed earlier in the enrollment agreement and does not appear to include the finance charges nor the difference between the balance due and amount financed.

The Commission also noted that many enrollment agreements included the phrase "institutional credit to cover balance." It is not clear what kind of credit is being provided to students, how much credit is being provided, what balance is being referred to, or how this "credit" is administered to comply with ACCET requirements. The Commission draws the institution's attention to ACCET Document 31, item #7, which does not allow students to be treated differently with respect to charges based on their source of funding. The Commission also noted that none of the fifteen student files submitted by the institution reflected any "institutional credit" on their accounts.

**Therefore, the institution must provide a narrative update on this issue, to include:**

- a. Revised enrollment procedures and an enrollment agreement that accurately reflects program costs and clearly communicate the nature of federal and third-party funding;**
  - b. Policies and procedures for admissions that include processes for completing the financial portion of the enrollment agreement;**
  - c. Policies and procedures governing the "institutional credit" provided to students, demonstrating that students are not treated differently based on their source of funding. The policies and procedures must clearly identify the terms and conditions of awards; the source of funding; the application procedures and deadlines; the criteria used to select award recipients; the parties responsible for selecting the recipients; the number of awards granted in 2017 and 2018; and the minimum and maximum number of awards granted each year. The procedures must also clearly indicate when students are awarded the credit, and the conditions for the award.**
  - d. The institution must provide a list of the students provided with this scholarship in 2017 and 2018, along with the amount provided to each student.**
4. As part of the interim report requirements, the institution was directed to provide enrollment agreements for both recently withdrawn or cancelled students as well as ten specific students who were listed in the team report. However, the institution provided only a single page of the enrollment agreement for these students, each of which clearly indicates "Page 1 of 3." The Commission notes that the refund policy was not included on this page, so the refund calculation done for each student could not be aligned with the policy.

**Therefore, the institution is directed to provide a narrative update on this issue, including complete enrollment agreements, to include all pages for all student records submitted in the previous interim report. Student records provided in this report must have complete enrollment agreements submitted in the appropriate portion of the response.**

5. The institution's ledgers did not align with other documentation. Student ledgers consistently indicated that full tuition was not charged upfront, but was charged in at least two periods. However, all other documentation provided by the institution indicated that the student is obligated for complete tuition charges upon enrollment, subject to the refund policy, which does not align with the multiple periods demonstrated by the ledger. The Commission found that this difference meant that when students withdrew, monies were actually charged to the ledger instead of credited.

Further, the Commission found discrepancies in the ledgers provided by the institution. For example, the ledger for L. Arguello indicates that the student was charged weeks before the enrollment agreement was even signed, and the fees listed on the student's enrollment agreement do not match the fees on the ledger. The institution's narrative indicates that the institution had lost documentation for M. Withers and that "RWM paid off the entire loan debt on December 29, 2016." However, the ledger for M. Withers indicates that the student's account still has a balance of \$10,250.72, and the loan repayment to the Department of Education appears to have been added back into the account as an outstanding balance for the student.

**Therefore, the institution is directed to provide a narrative update on this issue, to include:**

- a. **A narrative and supporting documentation to align the charges on student ledgers with the charges on the enrollment agreement;**
  - b. **A narrative explanation regarding the ledgers for L. Arguello and M. Withers.**
6. The program schedule in the institution's enrollment agreement, electronic attendance record, and daily attendance record did not align for any student files provided in the interim report. For example, the enrollment agreement for D. Smith indicates a Monday-through-Thursday schedule from 8:30am to 4:30pm, which would be eight hours per day if there is no break. The paper attendance records for D. Smith reflect a Monday-through-Thursday schedule, with the heading indicating "8:00am – 4:30pm," which would be 8.5 hours per day if there is no break. The Commission notes that the paper attendance records list AM and PM hours, indicating a possible lunch break resulting in even fewer instructional hours. However, the electronic attendance records list the daily hours as 8 hours and 33 minutes, or 8.55 hours, which are more daily hours than are scheduled on the paper record or outlined on the enrollment agreement.

As another example, D. Donahue's enrollment agreement indicates a part-time program with a schedule of 6pm-10pm, Monday through Thursday, but for whom the attendance record

lists a schedule of 8.55 hours, Monday through Friday. The actual record of attendance does not reflect either of these options, as it demonstrates 5.83 hours during the first two weeks with spotty attendance, then 8.55 hours afterward, with no documentation to support this change in program. Further, if the student attended on a part-time basis for at least a portion of the program, as the enrollment agreement and the attendance record indicates, albeit for different clock hours per day, then the calculation of scheduled clock hours done for that student is incorrect. The worksheets provided by the institution indicate a total of 487.35 possible scheduled clock hours, which would only be possible had the student been enrolled in a full-time program from the start date, a schedule that does not align with the agreement signed by the student. The Commission notes that if the student had been enrolled in a part-time program for at least a portion of enrollment, then it is likely that the student would be owed a refund.

The accuracy of scheduling is of serious concern, as the calculations made upon withdrawal of the amount of the program completed appear to be automatically calculated from the schedule listed in the electronic attendance record. As the schedules listed in the electronic attendance records reflect a more intensive schedule than the enrollment agreements and paper attendance records, the calculations of the possible scheduled clock hours appears to be more than were actually attended by the student.

**Therefore, the institution is directed to provide a narrative update on this issue, to include:**

- a. A narrative explanation of how a student's program schedule is consistently and accurately documented on the enrollment agreement and attendance record, as well as how changes to a student's schedule are documented to ensure that any subsequent calculation of scheduled hours is done correctly.**
- b. A narrative explanation and supporting documentation of the daily clock hours for the full-time program, as they are inconsistent on every document provided. The institution's enrollment agreements consistently list the daily schedule as 8:30am to 4:30pm. The institution's paper attendance records list the schedule as 8:00am to 4:30pm. Finally, the electronic records list the daily hours as 8.55 hours (8 hours, 33 minutes). The Commission notes that the paper attendance records list AM and PM hours, suggesting a lunch break, which results in even fewer instructional hours. The institution must also provide documentation of correction in these documents.**
- c. An explanation and supporting documentation for the fifteen students submitted in the previous interim report, whose attendance schedules did not align with the enrollment agreement, leading to concerns that the subsequent refund calculations were incorrect. Published course schedules for the institution's programs must also be provided. If discrepancies are found in the attendance schedules, the institution must provide revised refund calculation worksheets demonstrating the corrected information. If the enrollment agreements are incorrect, the institution must**

**provide evidence of training to ensure that enrollment agreements are completed correctly.**

**d. Documentation for five students who started their enrollment in 2018, to include the enrollment agreement, student ledger, and daily attendance record.**

7. The institution's documentation demonstrated significant discrepancies in attendance records. Electronic attendance records did not align with the paper attendance records provided, and demonstrated significant anomalies. For example, the paper attendance records for W. Mohamed indicated an early departure on December 18<sup>th</sup> at 3pm, but the electronic attendance records indicated full credit for that day. On December 26<sup>th</sup>, W. Mohamed was marked for an absence on the electronic records, but the paper records indicated a holiday on that day. The following day, December 27<sup>th</sup>, W. Mohamed was marked absent in the morning on the paper records, yet received full credit for that day on the electronic records.

Additionally, five students had "overrides" listed on their electronic attendance records, which add significant numbers of hours to the student's attendance. For example, A Hayward's electronic attendance record reflects three separate attendance overrides, which combined add an additional 184 hours and 21 minutes of completed hours that do not correspond to any scheduled classes. The Commission notes that these overrides had an impact on the refund for some students.

Student attendance records did not consistently align with enrollment agreements. For example, J. Weathersby's enrollment agreement indicates a program start date of August 22, 2016, but the attendance record does not start until over a year later, on September 5, 2017.

For four students, the attendance hours and/or last date of attendance listed on the electronic attendance record did not align with the information on the refund calculation worksheet.

- T. Staples - the electronic attendance record indicates a total of 684 scheduled clock hours (if the Monday-Friday, 8.55-hour/day schedule on the electronic record is correct) plus an "override" of 22.5 hours. However, the refund calculation worksheet indicates that the student had 760.95 total possible clock hours. The refund calculation worksheet also lists the Last Date of Attendance as May 26, 2017, while the electronic record indicates that the student's last attendance was on May 15, 2017. The electronic attendance record continues tracking attendance through January 2018, and the student status is listed as "on leave."
- W. Mohamed - the refund worksheet lists hours completed as 319.2, but the electronic attendance record indicates 264.63 hours completed without the "overrides", or 406.12 hours completed with the overrides.
- J. Vazquez - the electronic attendance record indicates that the student had no attendance during the first five weeks of class. It is not clear how the student maintained enrollment.

- J. Weathersby – the electronic attendance record indicated that the student had no attendance at all in the program. However, the refund calculation worksheet indicated the student had completed 42.75 clock hours and 205.20 scheduled clock hours.

The institution indicated in its response that it was purchasing a biometric scanner to facilitate its daily attendance tracking. The Commission advises the institution that if this scanner is at the entrance of the institution, it does not provide accurate attendance documentation, as students must be present in the classroom. Additionally, the institution must ensure that this new method of attendance tracking accurately reflects the instructional hours of the curriculum.

**Therefore, the institution is directed to provide a narrative update on this issue, to include:**

- a. A comprehensive review of paper and electronic attendance records to ensure alignment;**
  - b. A comprehensive explanation and supporting documentation of the “overrides” on the electronic records in five student files to demonstrate compliance with ACCET Document 35 – Attendance Policy: W. Mohamed, D. Smith, A. Hayward, J. Vazquez, and T. Staples, as well as corrected refund calculation worksheets and evidence of any corrected refunds, as applicable;**
  - c. Policies and procedures for attendance tracking and monitoring to demonstrate accurate and consistent records that reflect instructional hours, to include any new methods of evaluation as well as training relative to the revised policy;**
  - d. Documentation of electronic and paper records for five students for the period April 1 through June 29, 2018, to demonstrate consistently accurate attendance documentation.**
8. The institution was directed to provide documentation of high school graduation or the equivalent for fifteen students included in the interim report. This documentation was requested to demonstrate that the students met admissions requirements and federal financial aid requirements, if applicable. However, sufficient documentation was not provided for four students:
- W. Mohamed – the institution provided a certificate from “Humber College” in Canada. There was no accompanying documentation to demonstrate that this foreign institution met the requirements for Title IV eligibility.
  - L. Arguello – the institution provided a page that was illegible, and could not be verified as evidence of high school graduation.



- J. Weathersby – the institution provided only a transcript request form, but no documentation of high school graduation or the equivalent.
- J. Childs – the institution did not provide documentation of high school graduation or the equivalent.

**Therefore, the institution is directed to provide a narrative update on this issue, to include documentation for the four students listed above, including an evaluation of the foreign documentation by a party experienced in evaluating academic transcripts outside the United States.**

9. The institution indicated it had not yet received any updates from the Department of Education regarding its Program Review or HCM2 status.

**Therefore, the institution is directed to provide a narrative update on this issue, to include:**

- a. Any further communication from the Department of Education regarding the institution's Program Review or HCM2 status.**
  - b. Internally-generated financial statements (balance sheet, income statement, and statement of cash flows) for the period January 1, 2018 – June 30, 2018, along with a signed statement from the CEO or CFO attesting to the truth and accuracy of the statements.**
10. The institution was directed to provide updated completion and placement statistics and supporting documentation. The institution was also directed to provide updated placement documentation for D. Cardendas, and attestation forms for three additional graduates to demonstrate compliance with ACCET Document 28 regarding attestation requirements. Upon review, the Commission found that the institution's completion and placement rates could not be verified based on the documentation provided. The institution did not provide consistent attendance data, as some Document 28.2s contained attendance rates, while others did not. Given the previously-cited issues with attendance tracking and documentation, this is of serious concern. Further, the supporting documentation for placement did not provide accurate or complete information regarding the graduate's placement type, status, and timeframe. For example, the verification forms submitted for D. Cardenas only indicate that the graduate's employer is a "sub-contractor to US Army," the 28.2 lists "US ARMY" as the employer, and no actual employer details are included on any documentation. The continuing employment attestation for J. Desiderio is signed on the graduation date, not at least 30 days after graduation as ACCET policy requires. The verification forms for J. Nino and S. Nichols were signed, but neither student was placed. The institution is advised that serious action, including third-party verification, may be taken by the Commission if completion and placement statistics cannot be validated by the documentation provided by the institution.

**Therefore, the institution is directed to provide a narrative update on this issue, to include:**

- a. Updated Document 28.1s for all programs in calendar year 2017 and year-to-date 2018 (January 1 – February 28, 2018) along with a completed Document 28.2 – On-Site Sampling Verification Form (OSVF) for each monthly cohort for each program as well as all supporting waivers and placement documentation to support the completion and placement statistics. The institution is advised that the Document 28.2s must be filled out completely, including an accurate attendance percentage for each student.**
- b. The institution is directed to update its job placement procedures to:**
  - i. Ensure that staff signatures to verify job placement are signed at the time of verification, not pre-signed as was the case for S. Nichols and J. Nino.**
  - ii. Ensure that verification occurs no sooner than 30 days of employment in a training-related position, in addition to “no sooner than 30 days after graduation,” as indicated by the employment verification form.**
- c. Additionally, the institution is directed to either remove the following placements from the corresponding 28.1s or provide supporting documentation consistent with ACCET placement requirements to address the following placements, which were discounted by the Commission due to incomplete information:**
  - i. Cardenas, D. (Jan 2017, Broadband Cable and Satellite Tech) – missing name of employer**
  - ii. Desiderio, J. (April 2017, Fiber Optics Broadband Tech) – continuing employment attestation signed less than 30 days after graduation**
  - iii. Oshmago, M. (June 2017, Fiber Optics Broadband Tech) – missing placement waiver form with student signature and date and/or documentation that the duration of incarceration resulted in the graduate’s unavailability for placement.**
  - iv. Green, B. (June 2017, Fiber Optics Broadband Tech) – missing placement waiver form with student signature and date and/or documentation that the duration of the incarceration resulted in the graduate’s unavailability for placement.**
  - v. Grimajo, I. (June 2017, Fiber Optics Broadband Tech) – missing placement waiver form with student signature and date**
  - vi. Jones, M. (June 2017, Fiber Optics Broadband Tech) – missing job title**
  - vii. Nimock, D. (June 2017, Fiber Optics Broadband Tech) – employment verification forms indicated both full-time and part-time employment. Additionally, the Commission could not confirm that this placement was training-related.**
  - viii. Snook, P. (June 2017, Fiber Optics Broadband Tech) – verification form does not indicate what type of employment (full-time, part-time, temporary, etc.)**

- ix. **Kang, M. (June 2017, Communications Technician 102)- verification form does not indicate what type of employment (full-time, part-time, temporary, etc.)**
- x. **Davis, R. (September 2017, Communications Technician 102) - continuing employment attestation signed less than 30 days after graduation**

**The institution is directed to provide its interim report in a format that can be easily reviewed by the Commission. Separate PDFs must be provided for each numbered item above, with a table of contents correlated to the narrative and to the requirements of this letter. For #10a, the institution must provide one PDF file for each program to include the revised 28.1, followed by the 28.2, if applicable, and the supporting documentation for placements and waivers. Failure to provide a complete and thorough report that demonstrates compliance with the ACCET standards may result in denial of accreditation.**

A copy of this report, **including the attached interim report cover sheet**, must be emailed to [interimreports@accet.org](mailto:interimreports@accet.org) for receipt at the ACCET office no later than **July 15, 2018**, to provide the institution with sufficient time to prepare its financial statements.

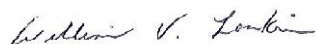
As a reminder, please be advised that late submission and receipt of documents and reports are subject to significant late fees in accordance with Commission policy. These fees are outlined in ACCET Document 10, which can be found at [www.accet.org](http://www.accet.org).

Further, while under a Show Cause directive, the institution is restricted from making any substantive changes including, but not limited to, new programs, major program revisions, new branch campuses or other new sites, or relocations out of the general market area.

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/or resolve the issues of concern cited herein, specifically focused on the demonstration of systematic and effective implementation of revised policies and procedures in practice over time.

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/meay

RWM Fiber Optics, Inc.

May 1, 2018

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Enclosures: Interim Report Cover Sheet  
On-Site Sampling Verification Form

CC: Mr. Herman Bounds, Chief, Accreditation Division, US ED (aslrecordsmanager@ed.gov)  
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