

STATE BOARD OF COMMUNITY COLLEGES
Refusal to Recommend Initial Proprietary School Licensure
for One or More Programs

The North Carolina State Board of Proprietary Schools submits this Refusal to Recommend Initial Proprietary Licensure For One Or More Programs to the North Carolina State Board of Community Colleges, pursuant to Article III, Chapter 150B of the North Carolina General Statutes, and 2B SBCCC Subchapter 100.

Proprietary School: Palmetto School of Career Development
620 Lillington Highway, Suite A & B
Spring Lake, NC 28269

Mailing address: Darwyn Faulds, Owner
Palmetto School of Career Development
7301 Rivers Ave., Suite 260
North Charleston, SC 29406
School Administrator: Wayne Bogue

A copy of this document as compiled has been presented to the following:

1. Chair of the North Carolina State Board of Proprietary Schools
2. NCCCS Executive Vice President
3. NCCCS General Counsel
4. NCCCS Director of Marketing and Public Affairs

A copy of this document as compiled has been presented to the Chief Administrator of the proprietary school at issue within five (5) business days of the initial license recommendation of the State Board of Proprietary Schools. Service was made via email and certified mail to Darwyn Faulds, owner of Palmetto School of Career Development.

Submitted this 11th day of February, 2016



Scott Corl, Executive Director
Office of Proprietary Schools

**NOTICE OF REFUSAL TO RECOMMEND INITIAL
PROPRIETARY LICENSURE FOR ONE OR MORE PROGRAMS**

The North Carolina State Board of Proprietary Schools submits this Refusal to Recommend Initial Proprietary Licensure For One Or More Programs to the North Carolina State Board of Community Colleges, pursuant to Article III, Chapter 150B of the North Carolina General Statutes, and 2B SBCCC Subchapter 100.

I. Statutory Authority

Under Article 8, Chapter 115D of the North Carolina General Statutes, the State Board of Community Colleges (“SBCC”) licenses proprietary schools upon the recommendation of the State Board of Proprietary Schools (“SBPS”).

In accordance with N.C.G.S. §115D-93, a refusal to issue, refusal to renew, suspension of, or revocation of a proprietary license shall be made in accordance with Chapter 150B of the General Statutes. The State Board of Community Colleges Code provides due process through 2B SBCCC Subchapter 100.

II. Refusal to Recommend Initial License for One or More Programs

Palmetto School of Career Development (“Palmetto”) is a proprietary school licensed in South Carolina (5 campuses), Georgia (5 campuses) and Alabama. Palmetto submitted an application for initial proprietary school licensing in North Carolina in or about July, 2015. Palmetto’s initial application requested approval and licensing to offer seven programs:

1. Dental Assisting Chairside (84 clock hours)
2. Dental Front Office Administration (36 clock hours)
3. Pharmacy Technician (36 clock hours)
4. Medical Administrative Assisting (48 clock hours)
5. Bookkeeping (48 clock hours)
6. Legal Administrative Assisting (48 clock hours)
7. Administrative Assisting (48 clock hours)

On November 6, 2015, the State Board of Proprietary Schools (“SBPS”) met to consider Palmetto’s initial application for licensing. After lengthy discussion, the Board tabled consideration of Palmetto’s application until its next regularly scheduled meeting, holding that it was unable to make a final determination regarding whether the proposed programs met the statutory requirement in §115D-90(c)(1): *“The courses, curriculum and instruction are consistent in quality, content and length with similar courses in public schools and other private schools in the State, with recognized accepted standards.”* The Board directed the Office of Proprietary Schools (“OPS”) to request a program comparison analysis from Palmetto, which the school submitted on November 17, 2015, (See attached *“Comparison of North Carolina Community College Adult Education Courses (and Curriculum) to the Same or Similar Palmetto School of Career Development Courses”*). The SBPS also requested that Palmetto immediately

cease all advertising related to the proposed North Carolina campus until properly licensed, but this issue was not fully resolved until a follow up conversation between OPS and Palmetto on December 7, 2015.

On February 6, 2016, the SBPS met to reconsider Palmetto's initial application. After lengthy discussion, the Board recommended initial proprietary school licensing for Palmetto School of Career Development to offer the Dental Assisting Chairside program at 84 clock hours, contingent upon: 1) the school submitting documentation of an appropriate instructor approved by the NC Dental Board (the curriculum for the radiology portion of the program was approved by the Dental Board in or about November, 2015); and 2) third-party contracts for the lab portion of the program. The SBPS did not recommend approval and licensing for all remaining programs submitted in Palmetto's initial application, finding that the courses, curriculum and instruction were not "*consistent in quality, content and length with similar courses in public schools and other private schools in the State, with recognized accepted standards,*" as required by §115D-90(c)(1). The Board rejected Palmetto's analysis and found that similar or identical programs at North Carolina Community Colleges and licensed proprietary schools offered more instruction and training:

Pharmacy Technician (36 clock hours) – The attached Palmetto analysis states that this program is comparable because: 1) The Sandhills CC Pharmacy Technician course offers 24 hours to completion for a certificate, and 2) Palmetto offers 12 more hours of instruction for the same or similar course. The SBPS rejected this comparison for reasons outlined below.

- The 24-hour program identified by Palmetto appears to be a single continuing education course offered through ed2go. This course offers no certification and includes the disclaimer: "*This course is designed to give you an introduction to the profession of pharmacy technician. It will not supply enough information to sit for the national exam.*" See reference: <http://www.ed2go.com/sandhills/online-courses/pharmacy-technician-explore-career?tab=detail>
- This program is also not comparable to other Pharmacy Technician programs at Sandhills CC. Aside from the ed2go offering, Sandhills CC offers a single continuing education course (#1317 or #1318) that provides 105 hours of total instruction. See reference: <http://www.sandhills.edu/coned/professional-development/classes.php#health>.
- This program was also not found to be comparable to similar offerings at licensed proprietary schools. Twelve (12) proprietary schools offer a program similar to Palmetto's program. While there is a range of such offerings depending on the school, the shortest proprietary school clock hour program (120 clock hours) provides triple the instruction. For comparison:
 - Mount Eagle College - *Pharmacy Technician*, measured at 120 clock hours;
 - Chosen Healthcare Institute – *Pharmacy Technician*, measured at 240 clock hours;

- Southern College of Health Sciences – *Pharmacy Technician*, measured at 340 clock hours.

Medical Administrative Assisting (48 clock hours) - The attached Palmetto analysis failed to provide a comparison to licensed programs in North Carolina. The SBPS found this program incompatible because:

- The program was not comparable to certificate programs offered at community colleges. For example, Wake Technical CC offers a Medical Office Administration-Medical Office Specialist Certificate program requiring completion of 18 credit hours for graduation. This program consists of 6 total classes and the 5 main courses (“core”) provide approximately 208 hours of instruction. See reference: http://www.waketech.edu/sites/default/files/computer_technologies/Medical_Office_Administration.pdf
- This program was also not found to be comparable to similar offerings at licensed proprietary schools. Fourteen (14) proprietary schools offer a program similar to Palmetto’s program. While there is a range of such offerings depending on the school, the shortest proprietary school clock hour program (140 clock hours) provides nearly triple the instruction. For comparison:
 - Caring For Life - *Administrative Medical Assistant*, measured at 140 clock hours;
 - New Horizons Computer Learning Center-Charlotte- *Medical Front Office Assistant and Administration*, measured at 280 clock hours;
 - Southern College of Health Sciences - *Medical Administrative Assistant*, 340 clock hours.

Bookkeeping (48 clock hours) - The attached Palmetto analysis compares this program to various community college offerings, some as low as three hours. The SBPS rejected this comparison for reasons outlined below.

- The SBPS found the most appropriate comparison to be a 51-hour course at Davidson CC. The Davidson CC offering is a single continuing education course that provides no certification, yet offers more instruction than the Palmetto program. See reference: <https://www.davidsonccc.edu/course/acc/180>
- This program is also not comparable to certificate programs offered at community colleges, including a certificate program Davidson CC offers in accounting with an emphasis in bookkeeping. See reference: <https://www.davidsonccc.edu/academics/accounting%E2%80%A8-certificate-program-emphasis-bookkeeping>
- This program was also not found to be comparable to similar offerings at licensed proprietary schools. Three licensed proprietary schools offer accounting programs. All are measured in credit hours and provide far more instruction and training than the Palmetto offering:

- King's College – *Accounting*, measured at 31 credit hours;
- Miller-Motte College-Jacksonville - *Accounting Clerk*, measured at 20 credit hours;
- Miller-Motte College-Wilmington - *Accounting Clerk*, measured at 20 credit hours.

Administrative Assisting (48 clock hours) - The attached Palmetto analysis compares this program to various community college certificate offerings ranging from 12-18 hours. The SBPS rejected this comparison for reasons outlined below.

- This program was not found to be comparable to the identified certificate programs offered at community colleges. For example, Wake Tech CC offers an Office Administration-Office Specialist Certificate program requiring 18 credit hours to graduate. Completion of this program would provide students with approximately 208 hours of total instruction. See reference: [http://www.waketech.edu/sites/default/files/computer_technologies/Office Administration.pdf](http://www.waketech.edu/sites/default/files/computer_technologies/Office_Administration.pdf)
- This program was also not found to be comparable to similar offerings at licensed proprietary schools. Three proprietary schools have programs similar to this offering. All provide more instruction and training than the Palmetto program:
 - New Horizons Computer Learning Center-Charlotte – *Office Administrative Assistant*, measured at 88 clock hours;
 - Center For Employment Training – *Business Office Administration*, measured at 900 clock hours;
 - King's College – *Administrative Assistant*, measured at 29 credit hours.

Legal Administrative Assisting (48 clock hours) - The attached Palmetto analysis compares this program to various community college offerings, including a Paralegal Technology Certificate program at South Piedmont Community College (18 hours). The SBPS rejected this comparison for reasons outlined below.

- This program was not found to be comparable to the identified certificate program offered at South Piedmont CC. This 7-course program measured at 18 **CREDIT** hours provides graduates with approximately 256 hours of total instruction and training. See reference: <http://www.spcc.edu/uploads/curriculum-maps/2015/Paralegal%20Certificate%20Curriculum%20Map%202015-2016.pdf>
- This program was also not found to be comparable to similar offerings at licensed proprietary schools. Two proprietary schools currently offer programs similar to Palmetto's program. Both offer significantly more instruction and training:
 - King's College - *Legal Administrative Assisting*, measured at 37 credit hours;
 - ProTrain - *Paralegal Career Prep Master*, measured at 945 clock hours.

Dental Front Office (36 clock hours) - The attached Palmetto analysis attempts to compare this program to Medical Office Administration Certificate programs at various NC community colleges. The SBPS rejected this comparison for reasons outlined below.

- This program was not found to be comparable to the identified certificate programs, including the Medical Office Administration Certificate (17 hours) offered at South Piedmont CC. This 6-course program contains 4 “core” lecture courses (measured at 3 CREDIT hours each) that provide students with approximately 192 hours of classroom instruction. See reference:
<http://www.spcc.edu/uploads/curriculum-maps/2015/MOA%20Certificate%20Curriculum%20Map%202015-2016.pdf>
- This program was also not found to be comparable to similar offerings at licensed proprietary schools. Six schools offer similar programs. For comparison:
 - NC Dental U – Wake Forest – *Administrative Dental Professional*, measured at 40 clock hours;
 - Sunrise School of Dental Assisting – Raleigh - *Dental Administrative Assistant*, measured at 50 clock hours;
 - North Carolina Dental Assistant Training School – Charlotte – *Dental Front Office Administration*, measured at 80 clock hours.

III. Notice of Right to Provide Written Response:

You have the right to provide a written response within ten (10) business days of receiving this Notice. The response must be signed and directed to the Executive Director of the Office of Proprietary Schools on behalf of the State Board of Proprietary Schools:

Scott Corl, Office of Proprietary Schools
North Carolina Community College System Office
5001 Mail Service Center
Raleigh, NC 27699-5001