

Iowa College Student Aid Commission

Postsecondary Approval and Registration Administrator
200 10th Street, Fourth Floor
Des Moines, IA 50309
(515) 725-3470

Application for Approval and Registration of Postsecondary School Iowa Code Chapter 261B

Pursuant to Iowa Code Chapter 261B, the undersigned school applies for registration to conduct or maintain one or more courses of instruction, including courses of instruction by correspondence, where the courses are offered in Iowa or the school has a presence in Iowa and desires to offer courses in other states or foreign countries.

Submit a paper document and a complete duplicate in pdf format on a CD.
Applications may be submitted electronically by contacting the Postsecondary Approval Administrator at the Iowa College Student Aid Commission.

Applications for an initial approval and registration must include a *non-refundable* check for \$4,000 payable to the State of Iowa.

Applications fees are to be sent to:

Postsecondary Approval and Registration Administrator
200 10th Street, Fourth Floor
Des Moines, IA 50309

All items must be completed before the application will be considered as received by the Commission. Attach additional pages as needed to provide the requested information. Responses are required to have a minimum of a summary paragraph on this form. Responses that include only statements similar to "please see attached", will be considered incomplete. Other documents or materials may also be attached to support the application. Attachments must be tabbed and clearly marked on both the paper and pdf documents.

(Registrations must be renewed every four years or upon any substantive change in program offerings, location, or accreditation.)

Name of school and address of the principal office as defined in Iowa Code Section 490.140 or 510.141:
[(261B 4(2))] and [(261B.4(1))]

Name of School: Tulsa Welding School
Suite: _____
Street: 2545 E. 11th Street
City: Tulsa
State: Oklahoma
Zip: 74104
Country: USA
Telephone Number (including country or area code): (918) 587-6789

Type of corporation:

- For-profit
 Non-profit

Address of this school in all in other states, and in foreign countries:

Suite	Street	City	State	Zip	Country	Telephone
	3500 Southside Blvd	Jacksonville	Florida	32216	USA	(904) 646-9353

Address of all locations in Iowa where instruction is to be provided

Suite	Street	City	State	Zip	Country	Telephone
	N/A					

Tuition charges, fees and other costs payable to the school by a student. [(261B.4(3))]

Program to be Offered in Iowa	Tuition	Fees	Books and Supplies	Other	Total
Structural Welder	\$7,707	\$725	\$710	\$252	\$9,394
Professional Welder	\$13,940	\$1,462	\$782	\$252	\$16,436
AOS- Welding Technology	\$27,880	\$2,393	\$2,095	\$504	\$32,872

Refund policy of the school for the return of refundable portions of tuition, fees, or other charges [(261B.4(4))] If the refund policy is attached, please summarize the policy below.

Refund Summary attached- see Tab 1

Degrees granted by the school [(261B.4(5))]

Offered in Iowa [(261B.4(11))]

Offered outside of Iowa

Associate of Occupational Studies in Welding Technology- available at campus located in Tulsa, OK only

Name, business address and telephone number of the chief executive officer of the school: [(261B.4(7))]

Name: Mary Kelly
 Suite: _____

Street: 2915 Orchardpark Dr.
City: Cincinnati
State: Ohio
Zip: 45239
Country: USA
Telephone Number (including country or area code): (513) 545-1054

Provide a copy or description of the means by which the school intends to comply with 261B.9 [(261B.4(8))].
Code section 261B.9 is as follows: **AD= Catalog Addendum #2**

261B.9 DISCLOSURE TO STUDENTS.

Prior to the commencement of a course of instruction and prior to the receipt of a tuition charge or fee for a course of instruction, a school shall provide written disclosure to students of the following information accompanied by a statement that the information is being provided in compliance with this section:

1. The name or title of the course. See Tab 2; Catalog page 2 & 3
2. A brief description of the subject matter of the course. See Tab 2; Catalog page 2 & 3
3. The tuition charge or other fees charged for the course. If a student is enrolled in more than one course at the school, the tuition charge or fee for all courses may be stated in one sum. See Tab 2; AD page 1 & 4
4. The refund policy of the school for the return of the refundable portion of tuition, fees, or other charges. If refunds are not to be paid, the information shall state that fact. See Tab 2; Catalog page 18-20
5. Whether the credential or certificate issued, awarded, or credited to a student upon completion of the course or the fact of completion of the course is applicable toward a degree granted by the school and, if so, under what circumstances the application will be made. See Tab 2; Catalog page 7
6. The name of the accrediting agency recognized by the United States department of education or its successor agency which has accredited the school. See Tab 2; Catalog page 3 & 4

Response:

Please refer to Tab 2; pages 2-4, 7, 18-20, and Catalog Addendum #2; page 1 & 4

Name, address, and telephone number of a contact person in Iowa. [(261B.4(10))]

Name: Mark E. Neiters, Berger Law Firm, P.C.
Suite: 1040
Street: 7109 Hickman Road
City: Des Moines
State: Iowa
Zip: 50322
Country: USA

Telephone Number (including country or area code): (515) 288-1040

Name, address, and title of the other officers and members of the legal governing body of the school:
[(261B.4(6))]

Officer Number 1

Name: Mary Keily
Suite: _____
Street: 2915 Orchardpark Dr.
City: Cincinnati
State: Ohio
Zip: 45236
Country: USA
Telephone No. (including country or area code): (513) 545-1054

For officers 2 or more, add pages as needed:

Owner Number 2

Names and addresses of persons owning more than 10% of the school: [(261B.4(6))]

Name: Summer Street Capital II, LP.; Michael McQueeney
Suite: _____
Street: 42 Chapin Parkway
City: Buffalo
State: New York
Zip: 14209
Country: USA
Telephone Number (including country or area code): (716) 570-8717

For owners 2 or more, add pages as needed

Name all agencies accrediting the institution. For each agency, include name, address, telephone number, and whether the agency is recognized by the U.S. Department of Education. [(261B.4(9))] Attach copies of accreditation certificates of status for each agency. If the Iowa location is not accredited, provide accrediting agency certification that the Iowa location will be granted accreditation upon approval by the College Student Aid Commission. Provide documentation that every location of applicant school is approved by the accrediting agency and in good standing, for all locations throughout the world.

Accrediting agency 1

Name: Accrediting Commission of Career School and Colleges of Technology (ACCSC)
Suite: 302
Street: 2101 Wilson Boulevard
City: Arlington
State: Virginia
Zip: 22201
Country: USA
Telephone Number (including country or area code): (703) 247-4533
Contact Person: Ronald S. Blumenthal or Michael S. McComis

Please refer to Tab 4 for Accreditation documentation.

Is this agency recognized by the U. S. Department of Education? Yes No

Accrediting Agency 2

Name: _____
Suite: _____
Street: _____
City: _____
State: _____
Zip: _____
Country: _____
Telephone Number (including country or area code): _____
Contact Person: _____

Is this agency recognized by the U. S. Department of Education? [] Yes [] No

Accrediting Agency 3

Name: _____
Suite: _____
Street: _____
City: _____
State: _____
Zip: _____
Country: _____
Telephone No. (including country or area code): _____
Contact Person: _____

Is this agency recognized by the U. S. Department of Education? [] Yes [] No

Accrediting Agency 4+

Respond on a separate page:

Describe the procedures followed by the school for permanent preservation of student records. [(261B.4(12))]

All physical records of a currently enrolled student are maintained in the student's file and stored in fire proof filing cabinets kept in the Financial Aid Department and locked. The electronic records such as attendance and grades are entered into Tulsa Welding School CampusVue computer system and backed up daily. The storage media is kept in a fire proof filing cabinet in the Vice President, School Director's office and kept locked.

Provide the contact information to be used by students and graduates who seek to obtain transcript information.

Name: Please Refer to Tab 4 for contact information at each campus.
Suite: _____
Street: _____
City: _____
State: _____
Zip: _____
Country: _____
Telephone Number. (including country or area code): _____

List the states and approval or registration agencies for all states in which the school operates or maintains a presence.

Please refer to Tab 5 for a list of all states and approval/registration agencies.

State	Agency Name	Address	Contact Person	Telephone Number

Describe the academic and instructional methodologies and delivery systems to be used by the school and the extent to which the school anticipates each methodology and delivery system will be used, including, but not limited to, classroom instruction, correspondence, internet, electronic telecommunications, independent study, and portfolio experience evaluation. [[261B.4(13)]]
Tulsa Welding School instruction is done in the classroom for each program. We do not offer any other method for instruction at any of our campuses.

Provide the name of every other State of Iowa agency required to approve the applicant school in Iowa, the school's contact person at the agency and the current status of that approval. Attach documentation in the form of a letter or certificate for each agency.

Agency Name	Contact Person	Telephone Number	Approval Status
N/A			

Is the school subject to a limitation, suspension or termination (LST) order issued by the U.S. Department of Education?
 Yes No
 If yes, explain below.

N/A

Provide the name and contact information for a U. S. Department of Education official who can verify the LST statement.

N/A

Do you:

Enroll students in Iowa? Yes No Note: we have been registered in Iowa since 1/08

Employ Iowa faculty? Yes No

Do you intend to:

Enroll students in Iowa? Yes No

No Employ Iowa faculty? Yes No

Describe current operations or plans to enroll students in Iowa or employ Iowa faculty.

Tu/isa Welding School would like to advertise and recruit from high school located in the State of Iowa.

Name, address, and telephone number of full-time employees in Iowa.

Name: Please refer to Tab 6 for full-time employees.
Suite: _____
Street: _____
City: _____
State: _____
Zip: _____
Country: _____
Telephone Number (including country or area code): _____

Will your school comply with Iowa Code section 261B.7 limiting the use of references to the Secretary of State, State of Iowa, or College Student Aid Commission in promotional material (See the Iowa Code for details)

Yes No

Will your school comply with the requirements of Iowa Code section 261.9(1)"e" to "g"? [

(See the Iowa Code for details.) Yes No

Does the school agree to file annual reports that the Commission requires from all Iowa colleges and universities?

Yes No

Attached a copy of the applicant school's most recent audit prepared by a certified public accounting firm no more than 12 months prior to the application and state below where, in the audit report, there is evidence that the auditor is providing an unqualified opinion.

Please refer to Tab 8 for Audit and page 1- exhibit A for unqualified opinion.

Describe how students will be provided with access to learning resources, including appropriate library and other support services requisite for the schools' degree programs.

Please refer to Tab 2; Catalog Addendum #2; page 2 & 3; Tulsa Campus Facilities- A; Jacksonville Campus Facilities- B

Provide evidence that faculty within an appropriate discipline are involved in developing and evaluating curriculum for the program(s) to be registered in Iowa.

Please refer to Tab 9.

Provide evidence that the school has adequate physical facilities appropriate for the program(s) to be offered and are located in the state. Include a copy of a signed agreement for a facility purchase or lease or option to purchase or lease. Please include a photograph of the location.

Please refer to Tab 10 for floorplans of each campus.

Include a statement, signed by the chief executive officer of the applicant school, on school letterhead, demonstrating the school's commitment to the delivery of programs located in Iowa, and agreeing to provide alternatives for students to complete programs at other institutions if the applicant school closes the program before students have completed their courses of study.

Statement may be in an attached document. Please see Tab 11 for statement.

Provide an organizational plan that shows the location and physical address, telephone number, fax number and contact information for all internet-based and site-based educational locations, administrative, and service centers operated by the applicant and any parent organization.

Please refer to Tab 2- Catalog and Catalog Addendum.

Provide documentation showing the school's policy for the resolution of student and graduate comments and complaints. Provide complete contact information to which complainants may be referred.

Please refer to Tab 12; Also found in Catalog in Tab 2, page 7 & 16.

Provide a copy of a current Certificate of Authority provided by the applicant's home state and the Iowa Secretary of State.

Please refer to Tab 13.

Provide the U.S. Department of Education cohort default rate for each associated organizational entity for which the U.S. Department of Education reports a cohort default rate.

Please refer to Tab 14 for cohort default rate.

Provide the average debt upon graduation of individuals completing programs at each branch location and the entire organization,

Please refer to Tab 15 for average debt upon graduation.

Provide the U. S. Department of Education cohort graduation rate for each branch location and the total organization, showing rates for graduates of diploma, two-year, and four-year, programs if those rates are reported to the U. S. Department of Education National Center for Education Statistics.

Please refer to Tab 16 for cohort graduation rate provided to IPEDs

SIGNATURE

Applicant School Chief Executive Officer

Mary Kelly
Name

President
Title

Signature

Date

If any information in this application changes between the time of application Commission action, the school must inform the Commission by filing an Amended Application clearly indicating the information which is being amended. Amendments must be received before the Commission takes action.

Iowa College Student Aid Commission

Postsecondary Registration Administrator
200 10th Street, Fourth Floor
Des Moines, IA 50309

Exemption Claim Under Iowa Code Chapter 714

Submit a paper document and a complete duplicate in electronic .pdf format.

All items must be completed before the application will be considered as received by the Commission. Attach additional pages as needed to provide the requested information. Responses are required to have a minimum of a summary paragraph on this form. Responses that include only statements similar to "please see attached", will be considered incomplete. Other documents or materials may also be attached to support the application. Attachments must be tabbed and clearly marked on both the paper and pdf documents.

Iowa Code §714.19 provides nine exemptions from the instructional school filing requirements of Chapter 714. A special exemption is provided for certain trade and vocational schools. Filing an official claim of an exemption is optional – it simply places the school on record as asserting an exemption from registration. A school which falsely or erroneously claims an exemption remains subject to the enforcement authority of Chapter 714.

DO NOT COMPLETE BOTH THE EXEMPTION AND THE FILING STATEMENT

PART A – IDENTIFICATION

1. This claim of exemption is filed on behalf of:
Tulsa Welding School

Name or title of school: Tulsa Welding School

Address(es) of principal
office(s): 2545 E. 11th Street
Tulsa, OK 74104

Telephone Number (including country or area code): (918) 587-6789

Email Address

2. State the name, business address, business telephone number, and home address of the chief executive officer of the school:

Mary Kelly- Business Address: 3500 Southside Blvd., Jacksonville, FL 32216
Home Address: 2915 Orchardpark Dr., Cincinnati, OH 45239
Business Phone: (904) 646-9353
Personal Phone: (513) 545-1054

PART B – EXEMPTION

3. The school is exempt from filing a statement of financial responsibility pursuant to the following exception in Iowa Code §714.19: (check one) (if claiming trade/vocational school exemption, skip Items 3 and 4 and go to Item 5)
- 1. Colleges or universities authorized by the laws of Iowa or any other state or foreign country to grant degrees.
 - 2. Schools of nursing accredited by the board of nurse examiners or an equivalent public board of another state or foreign country.
 - 3. Public schools.
 - 4. Private and nonprofit schools recognized by the department of education or a local school board for the purpose of complying with chapter 299 and employing certified teachers. (See instructions.)
 - 5. Nonprofit schools exclusively engaged in training persons with physical disabilities in the state of IA.
 - 6. Schools and educational programs conducted by firms, corporations, or persons for the training of their own employees, for which no fee is charged.
 - 7. Seminars, refresher courses and schools of instruction sponsored by professional, business, or farming organizations or associations for the members and employees of members of such organizations or associations.
 - 8. Private business schools accredited by the accrediting commission for business schools or an acknowledged accrediting agency.
 - 9. Private college preparatory schools accredited or probationally accredited under section 256.11, subsection 13. (See instructions.)
4. Describe the course of instruction offered and set forth the facts establishing the appropriateness of the exemption.
-
-
-

The school is a trade or vocational school which has met the conditions for exemption

All items must be completed before the application will be considered as received by the Commission. Attach additional pages as needed to provide the requested information. Responses are required to have a minimum of a summary paragraph on this form. Responses that include only statements similar to "please see attached", will be considered incomplete. Other documents or materials may also be attached to support the application. Attachments must be tabbed and clearly marked on both the paper and pdf documents.

5. Each one of the following: (do not complete Item 5 if the school has completed Items 3 and 4)
- Option A** - A copy of a continuous corporate security bond payable to the state of Iowa in the sum of \$50,000 conditioned upon the faithful performance of all contracts and agreements with students. (See instructions for sample bond language). Please refer to Tab 7.
 - Option B** - A copy of an annual sworn C.P.A.'s financial statement showing a net worth of at least \$250,000 which is not filed on the school's behalf by a parent corporation, and which does not include a parent corporation's net worth in the financial statement. (See instructions).
 - Option C** - A copy of an annual sworn C.P.A.'s financial statement showing a net worth of at least \$250,000 which is filed on the school's behalf by a parent corporation, or which does include a parent corporation's net worth in the financial statement. (See instructions). The parent corporation hereby designates the following person as the corporation's registered agent under §714.18(2) (indicate name, address, and telephone number):

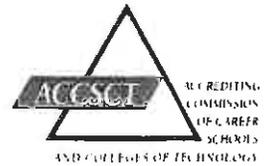
Refund Policy Summary

Refund Policy Summary

A student may cancel his/her enrollment at any time by submitting written notice of cancellation to Tulsa Welding School (TWS). The student's money shall be fully refunded, if requested within three (3) business days after signing an Enrollment Agreement and paying a registration fee or larger amount. Students who have not visited the campus before enrollment have the right to withdraw or cancel without penalty and receive a full refund of all monies paid, within three (3) business days following either attendance at a regularly scheduled orientation or following a tour of the TWS campus and inspection of equipment. If TWS rejects an applicant's enrollment, all monies received by TWS shall be refunded. If a student cancels his/her enrollment and more than three (3) business days have elapsed since the student signed their Enrollment Agreement, attended orientation, or have taken a tour of the TWS campus and inspected equipment, but have not yet begun training classes, then the student shall receive a refund of all monies paid except the registration fee(s), not to exceed \$150. If the student should find it necessary to discontinue or withdraw from his/her program before graduation, the student should notify the Director of Training or Student Advisor to officially withdraw. The termination date, once a student begins their training, will be the last date of attendance. If the student is absent fourteen (14) consecutive days without notice, he/she will be withdrawn from the program and is subject to the applicable refund policy for their state or campus. Please refer to the Catalog (Tab #2, pages 18-20) for additional details.

School Catalog
&
Catalog Addendum

Accreditation



September 11, 2009

PRIORITY MAIL
CONFIDENTIAL

Ms. Debbie Burke
Director
Tulsa Welding School
2545 East 11th Street
Tulsa, Oklahoma 74104-3909

School #M000285

Dear Ms. Burke:

At its August 2009 meeting, the Accrediting Commission of Career Schools and Colleges of Technology ("ACCSCCT" or the "Commission") considered the Application for a Change of Ownership submitted by Tulsa Welding School located in Tulsa Oklahoma. Upon review of the April 1, 2009 on-site evaluation report and the school's response to that report, the Commission determined that the institution has met the requirements for a change of ownership as required by accrediting standards.

In approving this substantive change, the Commission has expressed confidence in Tulsa Welding School's commitment to compliance with accrediting standards and to providing educational programs of high quality to its students.

For further assistance or additional information, please contact Thomas J. Cornacchia at 703.247.4057 or via email at tcornacchia@accsct.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Michale S. McComis", is written over a faint, larger version of the same signature.

Michale S. McComis, Ed.D.
Executive Director

c: Jack Forrest
Chair of the Commission

2101 Wilson Boulevard, Suite 302
Arlington, VA 22201
(703) 247-4212
Fax (703) 247-4533
www.accsct.org

ACCSCT APPROVED PROGRAM ENCLOSURE

TULSA WELDING SCHOOL (SCHOOL #M000285)
TULSA, OKLAHOMA

SEPTEMBER 7, 2007

Accreditation by ACCSCT is institutional in nature. The following programs are included in the school's record of accreditation as approved. This information should be maintained in the school's file and used when appropriate.

NON-DEGREE PROGRAMS	CLOCK HOURS/ CREDIT HOURS	AWARD
Master Welder	750/30	Diploma
Structural Welding	405/16	Diploma

DEGREE PROGRAMS	CLOCK HOURS/ CREDIT HOURS	AWARD
Welding Technology	1365/64	AOS

This information is current as of the date of this letter. Please be advised that a school may not describe in its catalog, advertise, enroll students in, or award credentials for new programs, substantive changes or degree programs prior to Commission approval (*Section IV (D)(10), Substantive Standards, Standards of Accreditation, formerly Accreditation Reviews, Standards of Accreditation*). A summary of the procedures for adding programs or making modifications to the school's approved programs is described below. Schools should refer to *Section IV, Rules of Process and Procedure of the Standards of Accreditation (formerly Accreditation Reviews, Introduction to the Standards of Accreditation)* for a more detailed explanation of all processes and procedures required for the addition or modification of programs.

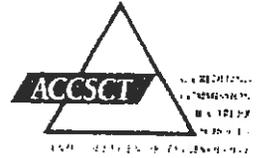
New Non-Degree Programs:

Related Programs

New programs that do not constitute substantive changes as described below must be reported to the Commission through the filing of an Application for a New Program-Related Program. An on-site evaluation to the school may be required at the discretion of the Commission. The new program will be recognized as within the school's institutional accreditation as of the date that the Commission approves the new program.

Unrelated Programs

Substantive changes to the programs offered by a school must be reviewed and approved by the Commission before they may be included within the scope of the school's accreditation. The addition of program which are unrelated to the approved programs offered by a school or the alteration of programs or courses that represent a significant departure in the objectives or content from the approved programs or courses offered by a school requires approval through the filling of an Application for a New Unrelated Program.



September 7, 2007

PRIORITY MAIL
CONFIDENTIAL

Mr. Roger Hess
President
Tulsa Welding School
2545 East 11th Street
Tulsa, Oklahoma 74101-3909

School #M000285

Dear Mr. Hess:

At its August 2007 meeting, the Accrediting Commission of Career Schools and Colleges of Technology ("ACCSCCT" or "the Commission") considered the Application for Renewal Accreditation submitted by Tulsa Welding School ("TWS") located in Tulsa, Oklahoma. Upon review of the March 12, 2007 Team Summary Report, and the school's response to that report, the Commission voted to grant the institution renewal of accreditation for a period of five (5) years going forward from April 1, 2007.¹

An *ACCSCCT Approved Program Enclosure* has been included with this letter as documentation of the school's approved programs. Although ACCSCCT accreditation is institutional in nature, all programs offered by the school must be approved by the Commission. You will find the Commission's requirements for the addition of new programs and modifications to existing programs in the *Standards of Accreditation*.

The mark of an accredited school is its commitment to continuous improvement. Accordingly, the Commission has included an *ACCSCCT Institutional Enhancement Enclosure* that lists suggestions deserving of your immediate attention and action.

In addition, the Commission monitors the continuous compliance of its accredited institutions through annual reports and the submission of other data including financial statements. Please be advised that the 2007 Annual Report will be due in the ACCSCCT office by **January 17, 2008**. Please also note that ACCSCCT accredited institutions are required to prepare and submit the 2007 Annual Report electronically. Instructions regarding the preparation of the electronic version of the annual report will be sent to your institution prior to the submission due date. Further, each school is required to submit its financial statements prepared in accordance with the *ACCSCCT Instructions for the Submission of Financial Statements and Financial Reporting* on an annual basis. Please ensure that each year the school submits its financial statements for the fiscal year-ended June 30 by December 31 of the same calendar year as required.

¹ According to the Commission's records, Tulsa Welding School was previously granted renewal of accreditation for five (5) years effective April 1, 2002. Therefore, Tulsa Welding School's accreditation is effective for a period of five (5) years going forward from April 1, 2007.

Tulsa Welding School – Tulsa, Oklahoma
School # M000285
September 7, 2007
Page 2 of 2

By renewing its accreditation, Tulsa Welding School has continued its partnership with other vocational educators who are committed to providing programs of quality and to conducting their affairs with integrity. The Commission is confident that you will take this responsibility seriously with consideration for the many other ACCSCT-accredited institutions that have embraced accreditation as a means to enhance student learning and achieve educational goals.

A Certificate of Accreditation will be forwarded under separate cover. You are reminded to adhere to the *Standards of Accreditation* as revisions to the Standards are approved and disseminated by the Commission. Please consult the ACCSCT website at www.accsct.org for updates on the Commission's initiatives and activities, and to review approved updates to the *Standards of Accreditation*.

If you need further assistance or information, please contact Joanna Boeri at (703) 247-4502 or via email at jboeri@accsct.org

Sincerely,



Elise Scanlon
Executive Director

cc: Gery Hochanadel, Ph.D.
Chair of the Commission

Encls: ACCSCT Approved Program Enclosure
ACCSCT Institutional Enhancement Enclosure

JJB

ACCSCT APPROVED PROGRAM ENCLOSURE
TULSA WELDING SCHOOL (SCHOOL #M000285)
TULSA, OKLAHOMA

SEPTEMBER 7, 2007

Accreditation by ACCSCT is institutional in nature. The following programs are included in the school's record of accreditation as approved. This information should be maintained in the school's file and used when appropriate.

NON-DEGREE PROGRAMS	CLOCK HOURS/ CREDIT HOURS	AWARD
Master Welder	750/30	Diploma
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DEGREE PROGRAMS	CLOCK HOURS/ CREDIT HOURS	AWARD
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New Non-Degree Programs:

Related Programs

New programs that do not constitute substantive changes as described below must be reported to the Commission through the filing of an Application for a New Program-Related Program. An on-site evaluation to the school may be required at the discretion of the Commission. The new program will be recognized as within the school's institutional accreditation as of the date that the Commission approves the new program.

Unrelated Programs

Substantive changes to the programs offered by a school must be reviewed and approved by the Commission before they may be included within the scope of the school's accreditation. The addition of program which are unrelated to the approved programs offered by a school or the alteration of programs or courses that represent a significant departure in the objectives or content from the approved programs or courses offered by a school requires approval through the filling of an Application for a New Unrelated Program.

Degree Programs:

Schools must have each degree program reviewed and approved by the Commission before the program is offered by filing an Application for Approval of a Degree Program.

Program Modifications:

Non-Substantive - Less Than 25 Percent

Non-substantive program modifications are those which result in less than a 25 percent change in the program's clock hours or credit hours or changes to the name of an approved program. The Commission does not require prior approval of non-substantive program modifications; however, schools must notify the Commission, in writing, of these types of modifications.

Schools must complete the Program Modification Report for Non-Substantive Changes with all attachments prior to the modification taking effect. In the event that it is determined that the program modification is in fact a substantive change, a school will be required to submit the appropriate substantive change report.

Substantive - 25 Percent or More

A substantial increase or decrease (a cumulative modification of 25 percent or more from the original date of program approval or the most recent accreditation review) in the clock hours or credit hours of an existing program requires approval in accordance with the substantive change provisions including the filing of an Application for a Substantive Program Modification.

ACCSCT INSTITUTIONAL ENHANCEMENT ENCLOSURE

TULSA WELDING SCHOOL (SCHOOL #M000285)
TULSA, OKLAHOMA

SEPTEMBER 7, 2007

The Commission directs the school's continued attention to the language used to advertise and promote Tulsa Welding School ("TWS") and its programs (*Section IV (D)(1), Substantive Standards, Standards of Accreditation, formerly Section IV (D)(1), Standards of Accreditation*). The Commission reviewed and accepted TWS' rationale for its use of the phrase "world class" to describe its training programs and the use of the phrase within the school's mission statement. As TWS continues to use this language within advertising materials to promote the school, it should also include a reference to the sources and documents contained within the response to the Team Summary Report that justify the description of the TWS as "world class" among welding schools and programs.



September 11, 2009

PRIORITY MAIL
CONFIDENTIAL

Ms. Debbie Burke
Director
Tulsa Welding School
2545 East 11th Street
Tulsa, Oklahoma 74104-3909

School #M000285

Dear Ms. Burke:

At its August 2009 meeting, the Accrediting Commission of Career Schools and Colleges of Technology ("ACCSCC" or the "Commission") considered the Application for a Change of Ownership submitted by Tulsa Welding School located in Tulsa Oklahoma. Upon review of the April 1, 2009 on-site evaluation report and the school's response to that report, the Commission determined that the institution has met the requirements for a change of ownership as required by accrediting standards.

In approving this substantive change, the Commission has expressed confidence in Tulsa Welding School's commitment to compliance with accrediting standards and to providing educational programs of high quality to its students.

For further assistance or additional information, please contact Thomas J. Cornacchia at 703.247.4057 or via email at tcornacchia@accsct.org.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michale S. McComis', is written over a horizontal line.

Michale S. McComis, Ed.D.
Executive Director

c: Jack Forrest
Chair of the Commission

2101 Wilson Boulevard, Suite 302
Arlington, VA 22201
(703) 247-4212
Fax (703) 247-4533
www.accsct.org

ACCST APPROVED PROGRAM ENCLOSURE
TULSA WELDING SCHOOL (SCHOOL #M000285)
TULSA, OKLAHOMA

SEPTEMBER 7, 2007

Accreditation by ACCST is institutional in nature. The following programs are included in the school's record of accreditation as approved. This information should be maintained in the school's file and used when appropriate.

NON-DEGREE PROGRAMS	CLOCK HOURS/ CREDIT HOURS	AWARD
Master Welder	750/30	Diploma
Structural Welding	405/16	Diploma

DEGREE PROGRAMS	CLOCK HOURS/ CREDIT HOURS	AWARD
Welding Technology	1365/64	AOS

This information is current as of the date of this letter. Please be advised that a school may not describe in its catalog, advertise, enroll students in, or award credentials for new programs, substantive changes or degree programs prior to Commission approval (*Section IV (D)(10), Substantive Standards, Standards of Accreditation, formerly Accreditation Reviews, Standards of Accreditation*). A summary of the procedures for adding programs or making modifications to the school's approved programs is described below. Schools should refer to *Section IV, Rules of Process and Procedure of the Standards of Accreditation (formerly Accreditation Reviews, Introduction to the Standards of Accreditation)* for a more detailed explanation of all processes and procedures required for the addition or modification of programs.

New Non-Degree Programs:

Related Programs

New programs that do not constitute substantive changes as described below must be reported to the Commission through the filing of an Application for a New Program-Related Program. An on-site evaluation to the school may be required at the discretion of the Commission. The new program will be recognized as within the school's institutional accreditation as of the date that the Commission approves the new program.

Unrelated Programs

Substantive changes to the programs offered by a school must be reviewed and approved by the Commission before they may be included within the scope of the school's accreditation. The addition of program which are unrelated to the approved programs offered by a school or the alteration of programs or courses that represent a significant departure in the objectives or content from the approved programs or courses offered by a school requires approval through the filing of an Application for a New Unrelated Program.



June 5, 2009

PRIORITY MAIL
CONFIDENTIAL

Wayne Gordin
Director
Tulsa Welding School
3500 Southside Boulevard
Jacksonville, Florida 32216-4634

School #B070499

Dear Mr. Gordin:

At its May 2009 meeting, the Accrediting Commission of Career Schools and Colleges of Technology ("ACCSCCT" or "the Commission") considered the Application for Renewal of Accreditation and the Application for a Change of Ownership-Part I and Part II submitted by Tulsa Welding School ("TWS-Jacksonville") located in Jacksonville, Florida.¹ Upon review of the February 2, 2009 Team Summary Report and the school's response to that report, the Commission voted to grant the institution renewal of accreditation for a period of five (5) years going forward from November 2008.² In addition, the Commission determined that TWS-Jacksonville has met the requirements for the change of ownership required by the *Standards of Accreditation*. The Commission's decision to confer accreditation will become effective upon a demonstration that the stipulation stated below has been satisfied. Once the stipulation has been satisfied, TWS-Jacksonville will receive a final letter of accreditation.

The Commission directs TWS to submit documentation of advising sessions provided to students (*Section VI (A)(3), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team's finding in this regard, TWS-Jacksonville provided its current and future plans for monitoring and advising student population. As part of its response, TWS-Jacksonville submitted an electronic data sheet entitled "Ability-to-Benefit Log and Procedure" and a copy of its Ability to Benefit Student Tracking and Counseling Procedure. The Commission noted that while the data sheet includes the test results for ability-to-benefit students admitted to the school, TWS-Jacksonville did not submit documentation of advising sessions provided to its students. Therefore, the Commission directs TWS-Jacksonville to submit documentation to demonstrate the implementation of advising services provided to its students as referenced in the response.

In addition, since TWS-Jacksonville stated in the Ability to Benefit Student Tracking and Counseling Procedure that the school's student advisor schedules one-on-one counseling sessions which are documented for content and attendance, the Commission directs TWS-Jacksonville to submit documentation to demonstrate that it has a qualified individual on staff who provides individual counseling to ability-to-benefit students. Alternatively, the school may submit documentation to demonstrate that it has contracted with or referred students to an individual or service that is able to provide such counseling services (*Section VI (A)(2), Substantive Standards, Standards of Accreditation*).

¹ A branch of Tulsa Welding School (*School #A000285*) located in Tulsa, Oklahoma.

² According to the Commission's records, the Commission previously granted TWS renewal of accreditation for five (5) years effective November 2003. Therefore, TWS's accreditation is effective for a period of five (5) years going forward from November 2008.

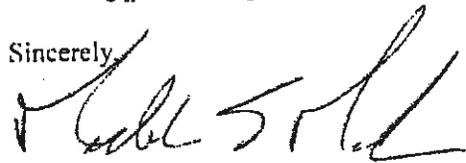
2101 Wilson Boulevard, Suite 302
Arlington, VA 22201
(703) 247-4212
Fax (703) 247-4531
www.accscct.org

An ACCSCT Approved Program Enclosure has been included with this letter as documentation of the school's approved programs. Although ACCSCT accreditation is institutional in nature, all programs offered by the school must be approved by the Commission. TWS-Jacksonville will find the Commission's requirements for the addition of new programs and modifications to existing programs in the *Standards of Accreditation*.

TWS-Jacksonville must provide a response to the above listed stipulation with documentation of compliance with accrediting standards. If the school's institutional response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information. TWS must submit its response in an electronic format, prepared in accordance with ACCSCT's Instructions for Electronic Submissions which are available online at www.accsct.org. The school's response must include a signed certification attesting to the accuracy of the information. The response must be received in the Commission office on or before July 23, 2009. If a response to this stipulation is not received in the Commission office on or before July 23, 2009, or if the response does not satisfy the stipulation, the matter will be forwarded to the Commission for further consideration.

If you need further assistance or information, please contact Mandy Wong at (703) 247-4515 or via email at mwong@accsct.org.

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c: Jack Forrest
Chair of the Commission

Encls.: ACCSCT Approved Program Enclosure
ACCSCT Stipulation Response Cover Sheet

MW

ACCSCCT APPROVED PROGRAM ENCLOSURE
TULSA WELDING SCHOOL (SCHOOL #B070499)
JACKSONVILLE, FLORIDA

JUNE 5, 2009

Accreditation by ACCSCT is institutional in nature. The following programs are included in the school's record of accreditation as approved. This information should be maintained in the school's file and used when appropriate.

NON-DEGREE PROGRAMS	CLOCK HOURS	SEMESTER CREDIT HOURS	AWARD
Master Welder	750	30	Diploma
Structural Welder	405	16	Diploma

This information is current as of the date of this letter. Please be advised that a school may not describe in its catalog, advertise, enroll students in, or award credentials for new programs, substantive changes or degree programs prior to Commission approval (*Section IV (D)(10), Substantive Standards, Standards of Accreditation*). A summary of the procedures for adding programs or making modifications to the school's approved programs is described below. Schools should refer to *Section IV, Rules of Process and Procedure of the Standards of Accreditation* for a more detailed explanation of all processes and procedures required for the addition or modification of programs.

New Non-Degree Programs:

Related Programs

New programs that do not constitute substantive changes as described below must be reported to the Commission through the filing of an Application for a New Program-Related Program. An on-site evaluation to the school may be required at the discretion of the Commission. The new program will be recognized as within the school's institutional accreditation as of the date that the Commission approves the new program.

Unrelated Programs

Substantive changes to the programs offered by a school must be reviewed and approved by the Commission before they may be included within the scope of the school's accreditation. The addition of programs which are unrelated to the approved programs offered by a school or the alteration of programs or courses that represent a significant departure in the objectives or content from the approved programs or courses offered by a school requires approval through the filing of an Application for a New Unrelated Program.

Degree Programs:

Schools must have each degree program reviewed and approved by the Commission before the program is offered by filing an Application for Approval of a Degree Program.

September 11, 2009

PRIORITY MAIL
CONFIDENTIAL



Mr. Wayne Gordm
Director
Tulsa Welding School
3500 Southside Boulevard
Jacksonville, Florida 32216-4634

School #B070499

Dear Mr. Gordm

The Accrediting Commission of Career Schools and Colleges of Technology ("ACCSCCT" or "the Commission") has received the response to its June 5, 2009 letter requesting that Tulsa Welding School ("TWS-Jacksonville") located in Jacksonville, Florida submit additional information in conjunction with its Application for Renewal of Accreditation and the Application for a Change of Ownership-Part I and Part II. This is to inform you that the school has satisfied the requirements of the stipulations through documentation provided in response to the Commission's letter and demonstrated compliance with the applicable accrediting requirements. Accordingly, the Commission's decision to grant the institution renewal of accreditation is hereby effective for a period of five (5) years going forward from November 2008. In addition, the Commission determined that TWS-Jacksonville has met the requirements for the change of ownership required by the *Standards of Accreditation*.

Through the renewal of its accreditation, TWS-Jacksonville has continued its partnership with other educators who are committed to providing programs of quality and to conducting their affairs with integrity. The Commission is confident that TWS-Jacksonville will take this responsibility seriously with consideration for the many other ACCSCCT-accredited institutions that have embraced accreditation as a means to enhance student learning and achieve educational goals.

In accordance with this action, the Commission will forward a Certificate of Accreditation to TWS-Jacksonville under separate cover. The Commission expects that TWS-Jacksonville will adhere to the *Standards of Accreditation* on an on-going basis and as revisions are approved and disseminated. Please consult the ACCSCCT website at www.aceset.org regularly for updates, important due dates, initiatives, and special events that are planned for the benefit of the Commission's accredited institutions.

Please note that ACCSCCT-accredited institutions are required to prepare and submit the 2009 Annual Report electronically. Instructions regarding the preparation of the electronic version of the Annual Report are available at www.aceset.org. Further, ACCSCCT-accredited institutions are required to submit annual financial statements in accordance with the ACCSCCT Instructions for the Submission of Financial Statements and Related Information and the due dates established therein.

If you need further assistance or information, please contact Karen Marcinski at (703)247-4531 or via email at kmarenska@aceset.org.

Sincerely,

Michale S. McConns, Ed.D.
Executive Director

Jack Forrest
Chair of the Commission

Ms. Debbie Burke
Director
Tulsa Welding School - School #M000285
2545 E. 11th St.
Tulsa, Oklahoma 74104-3909

According to the Commission's records, the Commission previously granted TWS Jacksonville renewal of accreditation for five (5) years effective November 2003. Therefore, the school's accreditation is effective for a period of five (5) years going forward from November 2008.

Contact Information
for
Student Transcript
Information

Student Transcript Contact Information

Tulsa, OK

Brittney Heyman
2545 E. 11th Street
Tulsa, OK 74104
(918) 587-6789 Ext. 271

Jacksonville, FL

Patti Baker
3500 Southside Blvd.
Jacksonville, FL 32216
(904) 646-9353 Ext. 244

List of States
&
Approval/Registration
Agencies

List of States and Approval Agencies for Tulsa Welding School in Tulsa, OK and Jacksonville Florida

State	Agency Name	Address	Address 2	City	State	Zip	Contact Person	Phone Number
OK	Oklahoma Board of Private Vocational Schools	3700 N. Classen Blvd.	Suite 250	Oklahoma City	OK	73118-2864	Dennis Rea	(405) 528-3370
AR	Arkansas State Board of Private Career Education	501 Woodlane	Suite 312 South	Little Rock	AR	72201-	Sara Hill	(501) 683-8000
KS	Kansas Board of Regents	1000 SW Jackson	Suite 520	Topeka	KS	66612-	Jacqueline Johnson	(785) 296-4917
MO	Missouri Department of Higher Education	3515 Amazonas Drive		Jefferson City	MO	65109-	Leslie Winters	(573) 751-2361
NM	New Mexico Higher Education Department	2048 Galisteo Street		Santa Fe	NM	87505-2100	Stephanie Ellis	(505) 476-8430
NE	Nebraska Department of Education	301 Centennial Mall South	PO Box 94987	Lincoln	NE	68509-	Carol Grell	(402) 471-4825
TX	Texas Workforce Commission #S2125; Career Schools and Colleges	101 E. 15th Street		Austin	TX	78778-0001	Vangie Sandoval	(512) 463-2222
LA	Louisiana Board of Regents	1201 N. Third St.	Suite 6-200	Baton Rouge	LA	70802-	Kristy Kron	(225) 342-4253
AL	Alabama Department of Postsecondary Education	P.O. Box 302130		Montgomery	AL	36130-2130	Annette McGrady	(334) 242-2959
FL	Florida Commission for Independent Education #2331	325 W. Gaines Street	Suite 1414	Tallahassee	FL	32399-0400	Jack Montfort	(850) 245-3200
GA	Georgia Nonpublic Postsecondary Education Commission	2082 E. Exchange Place	Suite 220	Tucker	GA	30084-5305	Dr. Ben Sealy	(770) 414-3300
KY	Kentucky State Board for Proprietary Education # N-0064	P.O. Box 1360		Frankfort	KY	40602-	Lindsey Lane (237)	(502) 564-3296
TN	Tennessee Higher Education Commission #358	404 James Robertson Pkwy.	Pkwy. Twrs, Ste 1900	Nashville	TN	37243-	Teresa Warren	(615) 741-5293
UT	State of Utah (Department of Commerce; Division of Consumer)	160 East 300 South	2nd Floor Box 146704	Salt Lake City	UT	84114-6704	Marla	(801) 530-6340

Bond

HARTFORD FIRE

INSURANCE COMPANY

INSTRUCTIONAL SCHOOL BOND

Bond No. 38BSBEX6237

KNOW ALL PERSONS BY THESE PRESENTS, That we, Tulsa Welding School, Inc.,
as Principal, and Hartford Fire Insurance Company as Surety, are held and firmly bound unto the State of
Iowa in the sum of \$50,000.00 lawful money of the United States, for which payment we bind ourselves,
our successors and assigns, jointly and severally, firmly by these presents.

WHEREAS the Principal proposes to maintain, advertise, or conduct in Iowa a course of instruction for profit, or
for tuition charge, by classroom instruction or by correspondence and to enter into contracts and agreements with students
for such courses of instruction; this Bond is conditioned on the faithful performance of all contracts and agreements made
by it or its salespersons with students. If the Principal shall faithfully perform all such contracts and agreements, then this
obligation is to be void and of no effect.

PROVIDED, The liability of the Surety upon this Bond shall be continuous, except that the Surety shall have the
right to terminate its liability under this Bond by serving notice of its election to do so upon the State of Iowa. The Surety's
liability under the Bond shall be terminated and canceled effective thirty (30) days after receipt by the State of a written
notice signed by the Surety or its authorized agent, stating that the liability of the Surety is thereby terminated and can-
celed. Thereafter the Surety shall be discharged from any liability under this Bond for any default or violation of the terms
of any contract or agreement made by the Principal or violation of the laws of the State of Iowa affecting such contract or
agreement occurring after the effective date of the cancellation of this Bond.

Signed and dated this 1st day of February, 2008

Tulsa Welding School, Inc.
Tulsa Welding School, Inc., Principal

By: Roger Hess, President

Hartford Fire Insurance Company

Hartford Fire

Ins. Co., Surety

By: Roy Thomason, Jr.
Roy Thomason, Jr., Attorney-in-Fact

POWER OF ATTORNEY

Direct Inquiries/Claims to:

THE HARTFORD

BOND, T-4

P.O. BOX 2103, 690 ASYLUM AVENUE

HARTFORD, CONNECTICUT 06115

call: 888-266-3488 or fax: 860-757-5835)

Agency Code: 38 381715

KNOW ALL PERSONS BY THESE PRESENTS THAT:

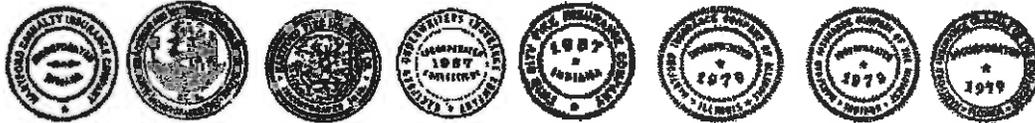
- Hartford Fire Insurance Company, a corporation duly organized under the laws of the State of Connecticut
- Hartford Casualty Insurance Company, a corporation duly organized under the laws of the State of Indiana
- Hartford Accident and Indemnity Company, a corporation duly organized under the laws of the State of Connecticut
- Hartford Underwriters Insurance Company, a corporation duly organized under the laws of the State of Connecticut
- Twin City Fire Insurance Company, a corporation duly organized under the laws of the State of Indiana
- Hartford Insurance Company of Illinois, a corporation duly organized under the laws of the State of Illinois
- Hartford Insurance Company of the Midwest, a corporation duly organized under the laws of the State of Indiana
- Hartford Insurance Company of the Southeast, a corporation duly organized under the laws of the State of Florida

having their home office in Hartford, Connecticut (hereinafter collectively referred to as the "Companies") do hereby make, constitute and appoint, **up to the amount of UNLIMITED**

ROY THOMASON, SR., ROY THOMASON, JR., MORRISENE HARMON, JOHN R. HOGAN OF TULSA, OKLAHOMA OF TULSA, OKLAHOMA

their true and lawful Attorney(s)-In-Fact, each in their separate capacity if more than one is named above, to sign its name as surety(ies) only as delineated above by , and to execute, seal and acknowledge any and all bonds, undertakings, contracts and other written instruments in the nature thereof, on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

In Witness Whereof, and as authorized by a Resolution of the Board of Directors of the Companies on January 22, 2004, the Companies have caused these presents to be signed by its Assistant Vice President and its corporate seals to be hereto affixed, duly attested by its Assistant Secretary. Further, pursuant to Resolution of the Board of Directors of the Companies, the Companies hereby unambiguously affirm that they are and will be bound by any mechanically applied signatures applied to this Power of Attorney.



Paul A. Bergenholz

Paul A. Bergenholz, Assistant Secretary

M. Ross Fisher

M. Ross Fisher, Assistant Vice President

STATE OF CONNECTICUT }
COUNTY OF HARTFORD } ss. Hartford

On this 1st day of February, 2004, before me personally came M. Ross Fisher, to me known, who being by me duly sworn, did depose and say: that he resides in the County of Hartford, State of Connecticut; that he is the Assistant Vice President of the Companies, the corporations described in and which executed the above instrument; that he knows the seals of the said corporations; that the seals affixed to the said instrument are such corporate seals; that they were so affixed by authority of the Boards of Directors of said corporations and that he signed his name thereto by like authority.



CERTIFICATE

Scott E. Paszka

Scott E. Paszka
Notary Public

My Commission Expires October 31, 2012

I, the undersigned, Assistant Vice President of the Companies, DO HEREBY CERTIFY that the above and foregoing is a true and correct copy of the Power of Attorney executed by said Companies, which is still in full force effective as of February 1, 2008
Signed and sealed at the City of Hartford.



Gary W. Stumper

Gary W. Stumper, Assistant Vice President



RIDER

Attached to and forming part of Bond # 83BSBEX6237
on behalf of Tulsa Welding School, Inc.
of 2545 E. 11th Street, Tulsa, OK 74104
in favor of State of Iowa, Secretary of State
and in the amount of Fifty Thousand (\$50,000.00) Dollars.

It is understood and agreed that effective February 1, 2010

The Bond number shall be changed

from 38BSBEX6237

to 83BSBEX6237

All other conditions and terms remain as originally written.

Signed, Sealed, and Dated October, 9th, 2009

Hartford Fire Insurance Company

By:

Marcia K. Cesafsky, Attorney-in-Fact

The above rider is hereby agreed to and accepted:

By:

Jessica E. Pres Pres

POWER OF ATTORNEY

Direct Inquiries/Claims to:

THE HARTFORD

BOND, T-4

P.O. BOX 2103, 690 ASYLUM AVENUE
HARTFORD, CONNECTICUT 06115

call: 888-266-3488 or fax: 860-767-5835

Agency Code: 83 511334

KNOW ALL PERSONS BY THESE PRESENTS THAT:

- Hartford Fire Insurance Company, a corporation duly organized under the laws of the State of Connecticut
- Hartford Casualty Insurance Company, a corporation duly organized under the laws of the State of Indiana
- Hartford Accident and Indemnity Company, a corporation duly organized under the laws of the State of Connecticut
- Hartford Underwriters Insurance Company, a corporation duly organized under the laws of the State of Connecticut
- Twin City Fire Insurance Company, a corporation duly organized under the laws of the State of Indiana
- Hartford Insurance Company of Illinois, a corporation duly organized under the laws of the State of Illinois
- Hartford Insurance Company of the Midwest, a corporation duly organized under the laws of the State of Indiana
- Hartford Insurance Company of the Southeast, a corporation duly organized under the laws of the State of Florida

having their home office in Hartford, Connecticut (hereinafter collectively referred to as the "Companies") do hereby make, constitute and appoint, **up to the amount of UNLIMITED**

MARCIA K. CESAFSKY, THOMAS J. JOSLIN, PATRICIA M. DOYLE, JENNIFER L. JAKAITIS,
SANDRA M. NOWAK, CHRISTOPHER P. TROHA OF CHICAGO, ILLINOIS

their true and lawful Attorney(s)-In-Fact, each in their separate capacity if more than one is named above, to sign its name as surety(ies) only as delineated above by , and to execute, seal and acknowledge any and all bonds, undertakings, contracts and other written instruments in the nature thereof, on behalf of the Companies in their business of guaranteeing the fidelity of persons, guaranteeing the performance of contracts and executing or guaranteeing bonds and undertakings required or permitted in any actions or proceedings allowed by law.

In Witness Whereof, and as authorized by a Resolution of the Board of Directors of the Companies on January 22, 2004, the Companies have caused these presents to be signed by its Assistant Vice President and its corporate seals to be hereto affixed, duly attested by its Assistant Secretary. Further, pursuant to Resolution of the Board of Directors of the Companies, the Companies hereby unambiguously affirm that they are and will be bound by any mechanically applied signatures applied to this Power of Attorney.



Scott Sadowsky

Scott Sadowsky, Assistant Secretary

M. Ross Fisher

M. Ross Fisher, Assistant Vice President

STATE OF CONNECTICUT

COUNTY OF HARTFORD

ss. Hartford

On this 3rd day of March, 2008, before me personally came M. Ross Fisher, to me known, who being by me duly sworn, did depose and say: that he resides in the County of Hartford, State of Connecticut; that he is the Assistant Vice President of the Companies, the corporations described in and which executed the above instrument; that he knows the seals of the said corporations; that the seals affixed to the said instrument are such corporate seals; that they were so affixed by authority of the Boards of Directors of said corporations and that he signed his name thereto by like authority.



CERTIFICATE

Scott E. Pasela

Scott E. Pasela
Notary Public

My Commission Expires October 31, 2012

I, the undersigned, Assistant Vice President of the Companies, DO HEREBY CERTIFY that the above and foregoing is a true and correct copy of the Power of Attorney executed by said Companies, which is still in full force effective as of October 9, 2009
Signed and sealed at the City of Hartford.



Gary W. Stumper

Gary W. Stumper, Assistant Vice President

Audit



Grant Thornton

Consolidated Financial Statements and Report of
Independent Certified Public Accountants

**TULSA WELDING SCHOOL, INC. AND
SUBSIDIARY**

September 30, 2009

Contents

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Consolidated Financial Statements:	
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Report of Independent Certified Public Accountants on Internal Control over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with <i>Government Auditing Standards</i>	15 - 16



Grant Thornton

Audit • Tax • Advisory

Grant Thornton LLP
2431 E. 61st Street
Suite 500
Tulsa, OK 74136-1208
T 918.877.0800
F 918.877.0805
www.GrantThornton.com

Report of Independent Certified Public Accountants

To the Shareholder
Tulsa Welding School, Inc. and Subsidiary

We have audited the accompanying consolidated balance sheet of Tulsa Welding School, Inc. (an Oklahoma corporation and wholly-owned subsidiary of T.H.E., Inc.) and Subsidiary as of September 30, 2009, and the related statements of income and retained earnings (accumulated deficit) and cash flows for the year ended September 30, 2009. These consolidated financial statements are the responsibility of the Company's management. Our responsibility is to express an opinion on these consolidated financial statements based on our audit.

We conducted our audit in accordance with auditing standards generally accepted in the United States of America as established by the American Institute of Certified Public Accountants and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement. An audit includes consideration of internal control over financial reporting as a basis for designing audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we express no such opinion. An audit also includes examining, on a test basis, evidence supporting the amounts and disclosures in the financial statements, assessing the accounting principles used and significant estimates made by management, as well as evaluating the overall financial statement presentation. We believe that our audit provides a reasonable basis for our opinion.

In our opinion, the 2009 consolidated financial statements referred to above presents fairly, in all material respects, the financial position of Tulsa Welding School, Inc. and Subsidiary as of September 30, 2009 and the results of their operations and their cash flows for the year ended September 30, 2009, in conformity with accounting principles generally accepted in the United States of America.

Exhibit
A

Our audit was conducted for the purpose of forming an opinion on the basic consolidated financial statements taken as a whole. The accompanying supplemental schedules are presented for purposes of additional analysis and are not a required part of the basic consolidated financial statements. Such information has been subjected to the auditing procedures applied in the audit of the basic consolidated financial statements and, in our opinion, is fairly stated in all material respects in relation to the basic consolidated financial statements taken as a whole.

In accordance with *Government Auditing Standards*, we have also issued our report dated November 2, 2009 on our consideration of Tulsa Welding School, Inc. and Subsidiary's internal control over financial reporting and on our tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements and other matters. The purpose of that report is to describe the scope of our testing of internal control over financial reporting and compliance and the results of testing, and not to provide an opinion on the effectiveness of Tulsa Welding School, Inc.'s internal control over financial reporting or on compliance. That report is an integral part of an audit performed in accordance with *Government Auditing Standards* and should be considered in assessing the results of our audit.

GRANT THORNTON LLP

Tulsa, Oklahoma
November 2, 2009

Tulsa Welding School, Inc. and Subsidiary

Consolidated balance sheet

As of September 30, 2009

ASSETS

CURRENT ASSETS:

Cash and cash equivalents	\$ 950,116
Accounts receivable, net of allowance for doubtful accounts of \$2,619,401	1,639,449
Inventory	58,825
Prepaid expenses	265,677
Current deferred income taxes	2,154,944
Total current assets	5,069,011

FURNITURE, EQUIPMENT AND IMPROVEMENTS:

Machinery and equipment	2,703,686
Furniture and fixtures	484,632
Automobiles	42,990
Leasehold improvements	2,440,893
	5,672,201
Less accumulated depreciation and amortization	(4,399,572)
	1,272,629

DEFERRED INCOME TAXES	46,476
-----------------------	--------

DEPOSITS	16,615
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Total assets	\$ 6,404,731
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LIABILITIES AND SHAREHOLDER'S EQUITY

CURRENT LIABILITIES:

Accounts payable	\$ 884,708
Accrued expenses	579,784
Prepaid tuition and fees	2,808,261
Total current liabilities	4,272,753

DEFERRED RENT	17,000
---------------	--------

SHAREHOLDER'S EQUITY:

Common stock, \$1 par value, 1,000 shares authorized, 100 shares issued and outstanding	100
Additional paid-in capital	2,274,900
Accumulated deficit	(160,022)
Total shareholder's equity	2,114,978
Total liabilities and shareholder's equity	\$ 6,404,731

The accompanying notes are an integral part of this consolidated financial statement.

Tulsa Welding School, Inc. and Subsidiary

Consolidated statement of income and retained earnings (accumulated deficit)

For the year ended September 30, 2009

REVENUE	
Tuition and fees	\$ 25,380,995
Other income	11,707
	<u>25,392,702</u>
EXPENSES	
Education	3,921,339
Marketing	2,122,496
Occupancy	1,099,301
General and administrative	11,353,994
Depreciation and amortization	435,010
	<u>18,932,140</u>
INCOME BEFORE INCOME TAXES	6,460,562
PROVISION FOR INCOME TAXES	<u>(2,469,947)</u>
NET INCOME	3,990,615
DISTRIBUTIONS TO PARENT	<u>(5,050,131)</u>
RETAINED EARNINGS, at beginning of period	899,494
ACCUMULATED DEFICIT, at end of period	<u><u>\$ (160,022)</u></u>

The accompanying notes are an integral part of this consolidated financial statement.

Tulsa Welding School, Inc. and Subsidiary

Consolidated statement of cash flows

For the year ended September 30, 2009

CASH FLOWS FROM OPERATING ACTIVITIES:

Net income	\$ 3,990,616
Adjustments to reconcile net income to net cash provided by operating activities:	
Depreciation and amortization	435,010
Increase in allowance for doubtful accounts	1,731,401
Deferred income taxes	(1,076,140)
Deferred rent	(39,104)
Decrease (increase) in:	
Accounts receivable	(1,354,697)
Inventory	47,628
Prepaid expenses	(62,722)
Deposits	(1,600)
Increase (decrease) in:	
Accounts payable and accrued expenses	464,331
Prepaid tuition and fees	1,826,116
Total net operating adjustments	1,970,223
Net cash provided by operating activities	5,960,839

CASH FLOWS FROM INVESTING ACTIVITIES:

Acquisition of furniture, equipment and improvements	(635,222)
--	-----------

CASH FLOWS FROM FINANCING ACTIVITIES:

Increase in due from parent company	(926,549)
Distributions to parent company	(5,050,131)
Net cash used in financing activities	(5,976,680)

NET DECREASE IN CASH AND CASH EQUIVALENTS	(651,063)
---	-----------

CASH AND CASH EQUIVALENTS, beginning of year	1,601,179
--	-----------

CASH AND CASH EQUIVALENTS, end of year	\$ 950,116
--	------------

SUPPLEMENTAL DISCLOSURE OF CASH FLOW INFORMATION:

Cash paid during the year for income taxes	\$ 26,000
--	-----------

The accompanying notes are an integral part of this consolidated financial statement.

Tulsa Welding School, Inc. and Subsidiary

Notes to consolidated financial statements

September 30, 2009

A - NATURE OF OPERATIONS

The Tulsa Welding School, Inc. is incorporated in the State of Oklahoma as a taxable Corporation and owns 100% of Tulsa Welding School/Jacksonville Campus, Inc. ("Subsidiary", collectively the "Company"). The Company is a wholly-owned subsidiary of T.H.E., Inc. ("Parent").

The Company has locations in Tulsa, Oklahoma and Jacksonville, Florida that provide proprietary, post-secondary education with instruction in structural, pipe, pipeline and aircraft welding and nondestructive weld testing through structured instructional programs.

In September 2008, all of the outstanding shares of the Parent were acquired by TWS Acquisition Corporation ("TWS"). Management elected not to apply push-down accounting to the transaction. Accordingly, the Company's consolidated financial statements reflect carryover basis of the Company's assets and liabilities. Additionally all acquisition related debt and corresponding interest costs have not been reflected in the Company's consolidated financial statements.

B - SUMMARY OF SIGNIFICANT ACCOUNTING POLICIES

1. Principles of Consolidation

The financial statements have been prepared on the accrual basis of accounting and include the accounts of the Company and its wholly-owned Subsidiary. All intercompany transactions and balances between the Company and its Subsidiary have been eliminated.

2. Cash and Cash Equivalents

Cash and cash equivalents consist of cash in the bank and all short-term investments with an original maturity of ninety days or less.

3. Accounts Receivable and Allowance for Doubtful Accounts

The Company occasionally grants credit to its students for the tuition and fees related to the instruction provided. The majority of accounts receivable recorded by the Company relate to credit provided to the students through federally guaranteed grants and loan programs utilized by students to finance education costs. An allowance for doubtful accounts is recorded based on Management's assessment of the realizability of customer accounts. Management assessment is based on the overall creditworthiness of the Company's customers and any specific disputes. Amounts are written-off when management deems them uncollectible.

4. Inventory

Inventory consists of various welding supplies and materials, which are carried at the lower of cost, determined by the first-in, first-out (FIFO) method of accounting, or market.

Tulsa Welding School, Inc. and Subsidiary

Notes to consolidated financial statement - continued

September 30, 2009

5. Furniture, Equipment and Improvements

Furniture, equipment and leasehold improvements are recorded on the basis of cost. Expenditures for renewals and betterments which extend the life of the assets are capitalized. Repairs and maintenance items are charged to expense as incurred.

6. Depreciation and Amortization

Depreciation of furniture and equipment and amortization of leasehold improvements is computed using the straight-line method based on the estimated useful lives of 3 to 7 years and the length of the leases.

7. Prepaid Tuition and Fees and Revenue Recognition

Revenues from student tuition and related fees are deferred at the time of registration and recognized ratably over the term of the enrollment. Amounts remitted by students, or on behalf of students, in excess of tuition are recorded as prepaid tuition which may be refunded or utilized by the student to pay future tuition. Tuition adjustments for students who withdraw are calculated in accordance with federal, state and accrediting agency standards. Accounts receivable result when the Company has earned more tuition revenue income than the student has paid. Unearned tuition revenue results when the Company has earned less tuition revenue income than the students have paid. The major components of accounts receivable and unearned tuition revenue are shown below:

Accounts receivable	
Uncollected tuition charges	\$ 9,715,079
Uncollected tuition charges not yet earned	<u>(5,456,229)</u>
Accounts receivable, uncollected tuition revenue earned but not collected	4,258,850
Allowance for doubtful accounts	<u>(2,619,401)</u>
Accounts receivable, net of allowance for doubtful accounts	<u>\$ 1,639,449</u>
Unearned tuition revenue	
Tuition charges not yet earned	8,264,490
Uncollected tuition charges not yet earned	<u>(5,456,229)</u>
Unearned tuition revenue	<u>\$ 2,808,261</u>

8. Deferred Rent

The Company recognizes rent expense on the straight-line method over the life of the lease. The cumulative excess of the amounts expensed over the payments required under the leases is recorded as deferred rent.

Tulsa Welding School, Inc. and Subsidiary

Notes to consolidated financial statement - continued

September 30, 2009

9. Advertising Costs

Advertising costs are expenses as incurred, and are reported in the accompanying statement of income. Total advertising expense for the year ended September 30, 2009 was \$2,122,496.

10. Use of Estimates in the Preparation of Financial Statements

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America requires management to make estimates and assumptions that affect the reported amount of assets and liabilities at the date of the financial statements and the reported amounts of assets and liabilities at the date of the financial statements, and the reported amounts of revenue and expenses during the reporting period. Significant estimates include, but are not limited to the allowance for bad debts, revenue recognition and estimated useful lives of long-lived assets. Actual results could differ from those estimates.

C - CONCENTRATION OF CREDIT RISK

The Company at times has cash deposits which exceed \$100,000 in various accounts at certain banks. The Federal Deposit Insurance Corporation ("FDIC") insures only the first \$100,000 of funds at member banks. The Emergency Economic Stabilization Act of 2008 that was enacted October 3, 2008, temporarily raised the FDIC insurance coverage to the first \$250,000 of funds at member banks. The temporary increase is scheduled to expire January 1, 2010. At September 30, 2009, the Company had \$842,785 in banks in excess of the FDIC coverage.

The accounts receivable are amounts receivable from students for tuition. Many of the Company's students are eligible for federal government loan and grant programs which are administered by the Company. These receivables are unsecured.

D - INCOME TAXES

The Company files a consolidated Federal income tax return with Parent and separate state tax returns. The Company provides for deferred income taxes under the asset and liability method of accounting. This method requires the recognition of deferred income taxes based upon the tax consequences of "temporary differences" by applying enacted statutory tax rates applicable to future years to differences between the tax and financial statement basis of assets and liabilities arising due to the use of revenue recognition and expense deduction methods for the tax purposes that differ from what is used for financial statement purposes. The deferred taxes represent the future tax return consequences of the difference between the basis of certain assets and liabilities for financial and tax reporting.

The components of income tax expense (benefit) are as follows:

Current income tax expense	\$ 3,546,087
Deferred tax benefit	<u>(1,076,140)</u>
Income tax expense	<u>\$ 2,469,947</u>

Tulsa Welding School, Inc. and Subsidiary

Notes to consolidated financial statement - continued

September 30, 2009

The effective tax rate for the year ended September 30, 2009 differs from the federal statutory rate of 34% principally because of the effects of state taxes and permanent differences.

Significant components of the Company's deferred tax assets of September 30, 2009 are as follows:

DEFERRED TAX ASSETS:	
Fixed assets	\$ 46,476
Accruals	112,921
Allowance for doubtful accounts	990,487
Deferred revenue	<u>1,051,536</u>
Total	<u>\$ 2,201,420</u>

E - SHAREHOLDER'S EQUITY

On September 10, 2008, the shareholders of TWS, parent company of T.H.E., Inc., entered into a subscription and shareholder agreement (the "Agreement"). Under the Agreement management shareholders purchased shares of TWS common stock with shareholder notes to TWS. Additional shares were purchased by another management owner in 2009. The outstanding balance of the notes is reflected as a reduction of equity.

Additionally, TWS has granted shares of TWS restricted stock to certain members of management of the Company during 2009. No amounts of compensation expense have been recorded in the financial statements as management determined the amounts were not material.

F - LEASE COMMITMENTS

The Company currently leases classrooms, equipment and office space under the terms of operating leases with escalating lease payments, which continue through August 2013. The Company has an option to extend some of the leases for additional five year terms. Future minimum rental payments under these agreements as of September 30 are as follows:

2010	\$ 312,305
2011	117,000
2012	117,000
2013	<u>97,500</u>
Total	<u>\$ 643,805</u>

The amount charged to rent expense for all operating leases for the year ended September 30, 2009 was \$370,799.

Tulsa Welding School, Inc. and Subsidiary

Notes to consolidated financial statement - continued

September 30, 2009

G - RELATED PARTY TRANSACTIONS

Tulsa Welding School, Inc. and Subsidiary, participates in Student Financial Aid ("SFA") under the Title IV programs administered by the U.S. Department of Education ("DOE") pursuant to the Higher Education Act of 1965, as amended ("HEA"). Tulsa Welding School, Inc. and Subsidiary must comply with the regulations promulgated under the HEA. Those regulations require that all related party transactions be disclosed, regardless of their materiality to the financial statements.

The Company and its Parent have guaranteed loans totaling approximately \$12,000,000 on behalf of the shareholder of the Parent. The loans will be repaid over a period of five years. The common stock of the Company and Parent are collateral on these loans.

TWS has separate management consulting agreements with two of its shareholders for services provided to the Company relating to business, administration and policies of the Company. Under terms of the agreements, the Company is required to pay a total of \$50,000 per quarter to these two shareholders. These agreements remain in effect as long as the shareholders own at least 10% of the outstanding shares of TWS.

H - RETIREMENT PLAN

The Company has a 401(k) Retirement Savings Plan for all eligible employees as defined by the Plan. The employees may contribute a percentage of their salary not to exceed the limits of the Internal Revenue Code. The Company may also make a discretionary contribution to the Plan. For the year ended September 30, 2009, the Company contributed approximately \$40,000.

I - 90/10 CALCULATION

Tulsa Welding School, Inc. derives a substantial portion of its revenues from SFA received by its students under the Title IV programs administered by the DOE pursuant to HEA. To continue to participate in the SFA programs, the Company must comply with the regulations promulgated under the HEA. The regulations restrict the proportion of cash receipts for tuition and fees from eligible programs to not more than 90 percent from the Title IV programs. The failure of the Company to meet the 90 percent limitation will result in the loss of the Company's ability to participate in SFA programs. Management has determined that the percentage of Title IV funding for the year ended September 30, 2009 was as follows:

Total Title IV funds	\$ 18,696,385
Total Eligible Cash Receipts	\$ 25,954,134
Title IV fund percentage	72.0%

J - REGULATORY

To participate in the Title IV programs, an institution is subject to extensive regulation and periodic reviews by the federal and state governmental agencies, and accrediting bodies involved. An institution must be authorized to offer its programs of instruction by the relevant agencies of the state in which it is located, accredited by and accrediting agency recognized by the DOE and certified as eligible by the DOE. On a periodic basis, an institution must be re-approved by these agencies to continue to receive Title IV funds. An institution must also demonstrate its compliance with HEA and the regulations promulgated thereunder to

Tulsa Welding School, Inc. and Subsidiary

Notes to consolidated financial statement - continued

September 30, 2009

the DOE on an ongoing basis. Political and budgetary concerns can significantly affect the Title IV Programs, and Congress must reauthorize the HEA approximately every six years. As of September 30, 2009, the Institution was properly authorized by the regulatory agencies involved and no regulatory reviews were being conducted by these respective agencies, except as noted below.

Regulations have been established which impose limitations on institutions whose former students default on the repayment of their federally guaranteed or funded student loans above specific rates (cohort default rate). An institution whose cohort default rate equals or exceeds 25% for three consecutive years will no longer be eligible to participate in the Federal Family Educational Loan program, Federal Direct Loan Program or the Pell program. An institution whose cohort default rate exceeds 40% may have its eligibility to participate in the Title IV Programs limited, suspended or terminated by the DOE.

Under the federal regulations mentioned above, the DOE calculates the institution's composite score based on a three factor financial responsibility ratio. An institution which does not meet the DOE's minimum composite score of 1.5 can demonstrate financial responsibility by meeting the "zone alternative" or posting a letter of credit in favor of the DOE. The "zone alternative" includes a delayed method of cash funding for Title IV aid, and the providing of additional information to the DOE, upon request. Management determined that the Company's cohort default rate and composite score at September 30, 2009 was as follows:

Company cohort default rate	4.7%
Composite score	1.9

The DOE conducted a program review with the focus of review on the ability to benefit requirements for a period of time prior to the change of ownership. The review report claimed the Company owed the DOE \$266,267. The amount was paid in October 2009.

K- SUBSEQUENT EVENTS

The Company has evaluated events or transactions that occurred subsequent to September 30, 2009 through November 2, 2009, the date these financial statements were available to be issued for potential recognition or disclosure in the financial statements.

SUPPLEMENTAL SCHEDULES

Tulsa Welding School, Inc. and Subsidiary

Consolidating Balance Sheet

September 30, 2009

	<u>Tulsa Welding School, Inc.</u>	<u>Tulsa Welding School / Jacksonvillle Campus, Inc.</u>	<u>Eliminations/ Reclassifications</u>	<u>Consolidated Total</u>
CURRENT ASSETS				
Cash and cash equivalents	\$ 922,636	\$ 27,480	-	\$ 950,116
Accounts receivable	2,704,726	1,554,124	-	4,258,850
Less allowance for doubtful accounts	(1,706,365)	(913,036)	-	(2,619,401)
Inventory	33,467	25,358	-	58,825
Due from affiliates	-	1,671,602	(1,671,602)	-
Prepaid expenses	127,839	137,838	-	265,677
Current deferred income taxes	1,223,367	931,577	-	2,154,944
Investment in subsidiary	2,429,078	-	(2,429,078)	-
Total current assets	<u>5,734,748</u>	<u>3,434,943</u>	<u>(4,100,680)</u>	<u>5,069,011</u>
FURNITURE, EQUIPMENT AND IMPROVEMENTS				
Machinery and equipment	1,897,868	805,818	-	2,703,686
Furniture and fixtures	325,279	159,353	-	484,632
Automobiles	42,990	-	-	42,990
Leasehold improvements	738,644	1,702,249	-	2,440,893
Accumulated depreciation and amortization	<u>3,004,781</u>	<u>2,667,420</u>	<u>-</u>	<u>5,672,201</u>
	(2,425,310)	(1,974,262)	-	(4,399,572)
	579,471	693,158	-	1,272,629
	53,158	-	(6,682)	46,476
	2,525	14,090	-	16,615
DEFERRED INCOME TAXES				
DEPOSITS				
Total assets	<u>\$ 6,369,902</u>	<u>\$ 4,142,191</u>	<u>\$ (4,107,362)</u>	<u>\$ 6,404,731</u>

Tulsa Welding School, Inc. and Subsidiary

Consolidating Statement of Income

Year ended September 30, 2009

	Tulsa Welding School, Inc.	Tulsa Welding School / Jacksonville Campus, Inc.	Eliminations	Consolidated Total
REVENUE				
Tuition and fees	\$ 14,363,715	\$ 11,017,280	-	\$ 25,380,995
Other income	11,707	-	-	11,707
	<u>14,375,422</u>	<u>11,017,280</u>		<u>25,392,702</u>
EXPENSES				
Education	2,155,058	1,766,281	-	3,921,339
Marketing	775,345	1,347,151	-	2,122,496
Occupancy	656,975	442,326	-	1,099,301
General and administrative	6,267,812	5,086,182	-	11,353,994
Depreciation and amortization	120,362	314,648	-	435,010
	<u>9,975,552</u>	<u>8,956,588</u>		<u>18,932,140</u>
INCOME BEFORE INCOME TAXES	4,399,870	2,060,692	-	6,460,562
PROVISION FOR INCOME TAXES	(1,690,332)	(779,615)	-	(2,469,947)
NET INCOME	\$ 2,709,538	\$ 1,281,077	-	\$ 3,990,615



Audit • Tax • Advisory

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Report on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance With *Government Auditing Standards*

To the Shareholder
Tulsa Welding School, Inc. and Subsidiary

We have audited the consolidated financial statements of Tulsa Welding School, Inc. and Subsidiary (collectively, the "Company") as of and for the year ended September 30, 2009, and have issued our report thereon dated November 2, 2009. We conducted our audit in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States.

Internal Control over Financial Reporting

In planning and performing our audit, we considered the Company's internal control over financial reporting as a basis for designing our auditing procedures for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the Company's internal control over financial reporting. Accordingly, we do not express an opinion on the effectiveness of the Company's internal control over financial reporting.

Our consideration of internal control over financial reporting was for the limited purpose described in the preceding paragraph and would not necessarily identify all deficiencies in internal control over financial reporting that might be significant deficiencies or material weaknesses. However, as discussed below, we identified certain deficiencies in internal control over financial reporting that we consider to be significant deficiencies.

A *control deficiency* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent or detect misstatements on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control over financial reporting that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.

We noted certain control deficiencies that we consider to be significant deficiencies that we reported to management of the company in a separate letter dated November 2, 2009.

A *material weakness* is a deficiency, or combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the Company's financial statements will not be prevented, or detected and corrected on a timely basis.

Our consideration of the internal control over financial reporting was for the limited purpose described in the first paragraph of this section and would not necessarily identify all deficiencies in the internal control that might be significant deficiencies and, accordingly, would not necessarily disclose all significant deficiencies that are also considered to be material weaknesses. However, we believe that none of the significant deficiencies described in our separate letter dated November 2, 2009 referenced above are a material weakness.

Compliance and Other Matters

As part of obtaining reasonable assurance about whether the Company's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts, and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

This report is intended solely for the information and use of management, the Board of Directors, others within the Company, and by the U.S. Department of Education and is not intended to be and should not be used by anyone other than these specified parties.

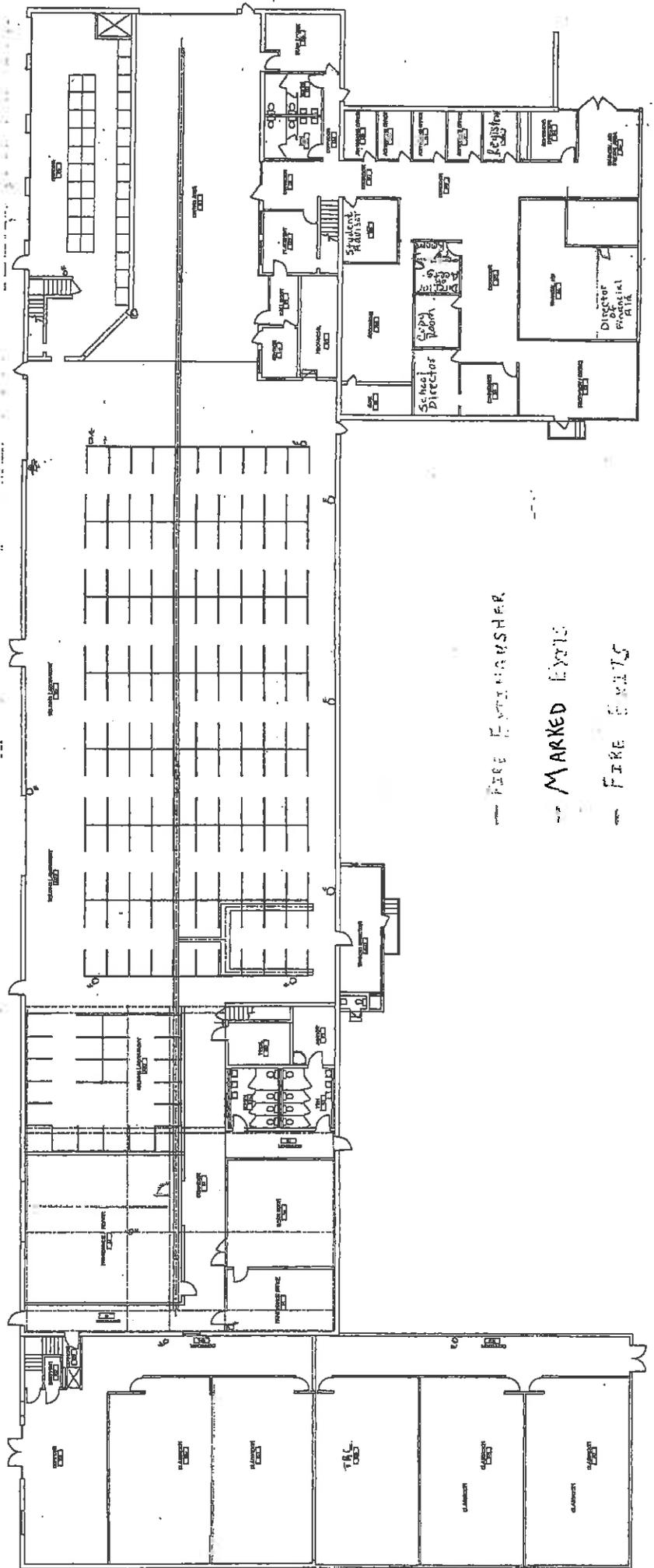
GRANT THORNTON LLP

Tulsa, Oklahoma
November 2, 2009

Evidence of Faculty Involvement in Curriculum

Floor Plans

Oxygen Argon Propane

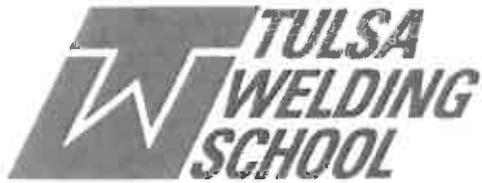


— FIRE EXTINGUISHER

— MARKED EXITS

— FIRE EXITS

Statement from CEO



"A Smart Investment"

September 2, 2010

To Whom it May Concern:

This statement is provided in accordance with Iowa Administrative Rules to demonstrate the commitment of Tulsa Welding School, Inc. to deliver, in their entirety, the Diploma program at campuses located in Tulsa, Oklahoma and Jacksonville, Florida and the Associate Degree program at the campus located in Tulsa, Oklahoma. Furthermore, Tulsa Welding School, Inc. is committed to finding alternatives for students to complete their program at the same or another institution should Tulsa Welding School, Inc. close any program prior to a student's completion of the program.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mary Kelly', is written over a horizontal line.

Mary Kelly, President

Tulsa Welding School

**Student
Complaint/Grievance
Procedure**

If termination appeal is denied, the student must remain out of school for a minimum of two phase terms before applying for reinstatement. If the appeal is successful, the student continues on Academic, Attendance, or Disciplinary Probation status and must complete the next two attended phases with a 'C' or higher in each phase to be deemed to be making satisfactory progress.

If a student previously terminated for unsatisfactory progress reapplies after two or more phase terms out of school and is reinstated, the student must make a passing grade of 'C' or higher for each of the next two attended phases. During these initial two phases after reinstatement, the student is not eligible for Federal financial aid. If the two phase performance is satisfied, a student becomes eligible for Federal financial aid within constraints of the satisfactory progress policy and eligibility for such funds according to Federal regulations. A student may be terminated if the two phase performance requirement is not satisfied. This procedure will not normally be granted more than once for the same student.

A student may repeat an individual phase course, such as Structural Welding I, only once. The higher earned grade will count in the CGPA calculation and the higher grade shall appear on the transcript. A student who does not pass a phase course within a welding or inspection program may rephase, which means to retake a phase course, only once at no charge for the entire program of training. The no charge aspect of this rephase only applies provided a student continues in the program of enrollment and graduates. Otherwise, a student is charged for each phase term attempted.

Additional rephases, if a student is eligible, beyond the one no charge rephase mentioned previously may be purchased at a fee of 300 dollars for the second rephase and, if eligible, additional rephases at a tuition and lab fee indicated in the student's Enrollment Agreement on a pro rata basis. Rephases exist to help students improve competencies in a phase course. Rephases from a student's point of view are not desirable because every rephase extends training time three more weeks and thus delays graduation and corresponding welding employment opportunities.

Students who are enrolled must have successfully completed a minimum of 70% of the first half of the program material within the required phases to the midpoint of a program to be considered as making satisfactory progress and therefore eligible for a financial aid disbursement under Title IV Federal Student Aid Programs. Academic progress sheets are available each instructional day and transcript records are permanently maintained by TWS.

GRADUATION DOCUMENT

Students who satisfactorily complete all specified phase courses within the program of enrollment, earn a CGPA of 2.00 or higher out of a possible 4.00, and complete all TWS graduate clearance requirements will be awarded a TWS diploma for a welder program or an Associate of Occupational Studies in Welding Technology degree, available at the Tulsa campus only.

DRUG FREE ENVIRONMENT

TWS has a Drug Free Workplace Policy and Statement. All applicants and students are encouraged to understand these requirements. Federal law mandates adherence to drug free workplace provisions for both students and staff. Please refer to TWS bulletin boards or ask for a copy of this policy to assure compliance. A copy is provided at new student orientation. All students and staff are subject to random drug testing at the school. Employers of graduates demand both weld test proficiency and clean drug tests.

CRIME AWARENESS AND CAMPUS SECURITY ACT

TWS makes available information on the above item to any applicant for enrollment requesting such information as well as current TWS students and staff. The report is produced by October 1 of each year for prior calendar years of possible crime activity on campus. Ask your Admissions Representative or the Student Advisor for a copy of this report.

STUDENT COMPLAINT/ GRIEVANCE PROCEDURE

Tulsa Campus

If a student becomes dissatisfied with some aspect of service or instruction provided by TWS, the student is requested to discuss the matter with the TWS department manager responsible for the service or instruction. If the matter is not resolved to the student's satisfaction, the student should review the matter with either Deborah Burke, Vice President, Executive Director, or Lawrence E. Brown, President, for resolution or understanding. Schools accredited by the Accrediting Commission of Career Schools and Colleges must have a procedure and operational plan for handling student complaints. If a student does not feel that the school has adequately addressed a complaint or concern, the student may consider contacting the Accrediting Commission. All complaints considered by the Accrediting Commission must be in written form, with permission from the complainant(s) for the Accrediting Commission to forward a copy of the complaint to the

school for a response. The complainant(s) will be kept informed as to the status of the complaint as well as the final resolution by the Accrediting Commission. Please direct all inquiries to:

Accrediting Commission of Career Schools and Colleges
2101 Wilson Blvd., Suite 302
Arlington, VA 22201
(703) 247-4212

The Accrediting Commission's Complaint Form is available from either Deborah Burke or Lawrence E. Brown.

Arbitration: Any dispute or civil claim between the student and TWS (other than those regarding non-payment, grades, other academic evaluation or return of school property) not otherwise resolved with TWS procedures or regulatory authorities, shall be submitted to binding arbitration in the City of Tulsa, Oklahoma pursuant to the rules of the American Arbitration Association. Such actions shall not be joined with the disputes of others, whether in a class action or any other action, regardless of whether they are similar in fact, law, or type. Any award entered shall be strictly confidential, final and binding.

TWS will not tolerate sexual harassment of a student by an employee, another student or a third party. Sexual harassment is deemed to be unwelcome conduct of a sexual nature. Any complaint in this area should be brought to the immediate attention of the TWS Vice President/Executive Director or President who will conduct an investigation in line with published procedures in the TWS Employee Guidebook.

Arkansas Students

Student may direct any complaints to the

Arkansas State Board of Private Career Education
501 Woodlane, Suite 312-S
Little Rock, Arkansas 72201
(501) 683-8000

Louisiana Students

Student complaints relative to actions of school officials shall be addressed to the

Board of Regents, Proprietary Schools Section, Post
Office Box 3677
Baton Rouge, Louisiana 70821
(225) 342-3543

only after the student has unsuccessfully attempted to resolve the matter with the school after having first filed a written and signed complaint with the school's officials.

STUDENT COMPLAINT/ GRIEVANCE PROCEDURE

JACKSONVILLE CAMPUS

If a student becomes dissatisfied with some aspect of service or instruction provided by TWS, the student is requested to discuss the matter with the TWS department manager responsible for the service or instruction. If the matter is not resolved to the student's satisfaction, the student should review the matter to Melissa Ryan, Executive Director, or Lawrence E. Brown, President, for final resolution or understanding.

Schools accredited by the Accrediting Commission of Career Schools and Colleges must have a procedure and operational plan for handling student complaint or concern. If a student does not feel that the school has adequately addressed a complaint or concern, the student may consider contacting the Accrediting Commission. All complaints considered by the Accrediting Commission must be in written form, with permission from the complainant(s) for the Accrediting Commission to forward a copy of the complaint to the school for a response. The complainant(s) will be kept informed as to the status of the complaint as well as the final resolution by the Accrediting Commission.

Please direct all inquiries to:

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2101 Wilson Blvd., Suite 302
Arlington, VA 22201
(703) 247-4212

The Accrediting Commission's Complaint Form is available from either Melissa Ryan, or Lawrence E. Brown.

Arbitration: Any dispute or civil claim between the student and TWS (other than those regarding non-payment, grades, other academic evaluation or return of school property) not otherwise resolved with TWS procedures or regulatory authorities, shall be submitted to binding arbitration in the City of Jacksonville, Florida pursuant to the rules of the American Arbitration Association. Such actions shall not be joined with the disputes of others whether in a class action or any other action, regardless of whether they are similar in fact, law, or type. Any award entered shall be strictly confidential, final and binding.

TWS will not tolerate sexual harassment of a student by an employee, another student or a third party. Sexual harassment is deemed to be unwelcome conduct of a sexual nature. Any complaint in this area should be brought to the immediate attention of the TWS President or Executive Director who will conduct an investigation in line with published procedure in the TWS Employee Guidebook.

A student may also file an unresolved complaint with the Florida Commission for Independent Education found on page 4.

- * Registered with Nebraska Department of Education
- * Registered with Iowa Secretary of State
- * Member of American Welding Society
- * Member of The American Society for Nondestructive Testing
- * Member of Tulsa Chamber of Commerce
- * Member of Oklahoma Private School Association
- * Member of Better Business Bureau
- * Member of Career College Association
- * Approved to participate in various federal job training programs.
- * Approved for eligible students to attend through sponsorship by Bureau of Indian Affairs or Vocational Rehabilitation Agencies
- * Approved for Veterans Educational Benefits

Jacksonville Campus:

- * Accredited by the Accrediting Commission of Career Schools and Colleges
- * Licensed by Florida Commission for Independent Education, License #2331
325 West Gaines St., Suite 1414,
Tallahassee, Florida 32399.
Toll-free phone number (888) 224-6684
- * Approved by Georgia Nonpublic Postsecondary Education Commission
- * Licensed by the Kentucky State Board of Proprietary Education
- * Authorized by Tennessee Higher Education Commission. This authorization must be renewed each year and is based on an evaluation by minimum standards concerning quality of education, ethical business practices, health and safety, and fiscal responsibility.
- * Approved to operate by the Missouri Department of Higher Education
- * Registered with New Mexico Commission on Higher Education
- * Registered with Iowa Secretary of State
- * Licensed by Alabama Department of Postsecondary Education
- * Approved by Kansas Board of Regents
- * Licensed by Louisiana Board of Regents
- * Registered with Virginia State Council of Higher Education
- * Member of American Welding Society
- * Member of Jacksonville Chamber of Commerce
- * Member of Better Business Bureau
- * Member of Florida Association of Postsecondary Schools and Colleges
- * Approved for Veterans Educational Benefits
- * Member of Career College Association

STUDENT SERVICES

TWS provides a multitude of student services from initial enrollment through graduation. Those services are listed as follows.

GRADUATE EMPLOYMENT

Graduates in good standing are provided assistance in resume writing, completing employment applications and job search preparation as well as ongoing access to employer job openings. The Employment Department maintains computer files on hundreds of welding employers nationwide and receives constant contacts from employers to hire TWS graduates. Please contact staff in the department at any time to obtain updates about recent graduate success and opportunities. Due to individual differences and personal attributes, neither TWS nor any other institution can guarantee graduate employment. Graduates remain in good standing provided they do not default on repayment of their student loan or school account balance obligation, if such applies.

STUDENT HOUSING

A TWS staff member works with new students to assist them in securing housing in both the Tulsa and Jacksonville area. A majority of the housing referral is with apartment complexes the school has previously inspected. Rooms in homes or home rental may be available to meet student needs. Please contact the housing advisor for current housing information at the Tulsa campus and the student employment/housing advisor at the Jacksonville campus.

PART-TIME EMPLOYMENT

Most students elect to work a part-time job while attending school to assist with living and school expenses. Also, students save a portion of their earnings to pay for relocation expenses in securing their first welder position after graduation. Students are encouraged to obtain a part-time job as soon as they begin school in order to build their financial resources while attending school. The Employment Department provides student assistance with part-time employment. TWS provides job opening leads for a student to pursue, and the individual student has the responsibility to interview and obtain a job.

ADVISING

Students may receive advisory services from an instructor, Director of Training, Student Advisor, or any other member of staff while attending TWS. Students are encouraged to seek out assistance when they need help.

FINANCIAL AID

Staff are available in the Financial Aid Department to assist students with application for financial assistances they may be eligible for under the Federal Pell Grant, Federal SEOG, and Federal Direct Loan programs. Services also apply toward other agency sponsorships and financing alternatives.

Certificate of Authority

IOWA

No. W00546683

Date: 10/22/2007

SECRETARY OF STATE

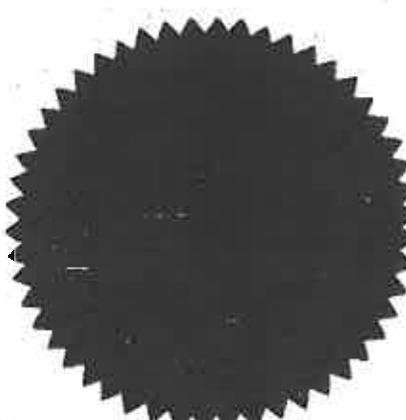
490 FP-000353253
TULSA WELDING SCHOOL, INC.

ACKNOWLEDGEMENT OF DOCUMENT FILED

The Secretary of State acknowledges receipt of the following document
Certificate of Authority

The document was filed on October 22, 2007, at 12:43 PM, to be
effective as of October 22, 2007, at 12:43 PM.

The amount of \$100.00 was received in full payment of the filing fee



Michael A. Mauro

MICHAEL A. MAURO SECRETARY OF STATE



Cohort Default Rate

Official Cohort Rate 2007 (2)
UNITED STATES DEPARTMENT OF EDUCATION
WASHINGTON, D.C. 20202
September 2009

Tulsa Welding School
2545 East 11th Street
Tulsa, OK 74104-3909
NL01

OPE ID: 009618
FY 2007 Cohort Default Rate: 4.7

RE: FY 2007 Official Cohort Default Rate Notification Letter

Dear President:

This letter officially notifies you of your school's fiscal year (FY) 2007 cohort default rate based on Federal Family Education Loan (FFEL) Program and/or William D. Ford Federal Direct Loan (Direct Loan) Program loans made to students for attendance at your school. Your school's FY 2007 cohort default rate is shown above. Please note that even if your school is no longer participating in the student loan program(s), federal law requires the U.S. Department of Education (Department) to notify your school of its cohort default rate.

Since the Department is no longer mailing hardcopies of the cohort default rate notification letters to any schools, please refer to the website <http://www.ed.gov/offices/OSFAP/defaultmanagement/ecdr.html> for a description of the other files that the Department transmitted to you along with this letter.

WHAT FORMULA DID THE DEPARTMENT USE TO CALCULATE MY SCHOOL'S RATE?

The Department uses one of three methods for calculation of cohort default rates:

1. Official non-average rate for schools with 30 or more borrowers entering repayment,
2. Official average rate for schools with 29 or fewer borrowers entering repayment, and
3. Unofficial rate for schools with 29 or fewer borrowers entering repayment with less than three years of data.

For complete explanation of the three types of rates, please see Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at <http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html>.

WHAT TYPES OF LOANS DID THE DEPARTMENT INCLUDE IN MY SCHOOL'S RATE CALCULATION?

The Department included three types of loans in your school's cohort default rate calculation:

- 1) Federal Stafford Subsidized and Federal Stafford Unsubsidized Loans
- 2) Federal Direct Subsidized and Federal Direct Unsubsidized Loans
- 3) Federal Supplemental Loans for Students (Federal SLS Loans). Although rare, it is possible for Federal SLS loans to be included in your school's cohort default rate calculation.

Official Cohort Rate 2007 (2)

WHAT LOAN RECORD DETAIL REPORT (LRDR) ACCOMPANIES THIS NOTIFICATION LETTER?

If your school's FY 2007 official cohort default rate is a non-averaged rate, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2007. If your school's FY 2007 official cohort default rate is an averaged rate, the LRDR that accompanies this letter reflects all loans that went into repayment during FY 2007, FY 2006 and FY 2005.

For more information on how to read the loan record detail report, please refer to Chapter 2.3 of the Cohort Default Rate Guide, Reviewing the Loan Record Detail Report, available at <http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html>.

WHAT SANCTIONS AND BENEFITS APPLY TO MY SCHOOL BASED ON THIS RATE?

According to the Higher Education Act of 1965 (HEA), as amended, the Higher Education Reconciliation Act of 2005 (HERA), Pub.L.109-71 and the Department's regulations, your school is not subject to any sanctions based on your school's FY 2007 cohort default rate. However, if your school's official FY 2007 cohort default rate is 25.0 percent or greater, the Department may provisionally certify your school when your school applies for recertification to participate in the Student Financial Assistance Programs. For more information about provisional certification, please refer to 34 C.F.R. Section 668.16(m)(1) and (2)(i) or contact the School Participation Management Division at 202-377-3173.

If your school's most recent official cohort default rate is less than 5.0 percent and your school is an eligible home institution that certifies/originates a loan to cover the cost of attendance in a study abroad program, your school is eligible for this benefit. Your school may disburse/deliver loan proceeds in a single installment and may choose to release loan proceeds to first-year, first-time borrowers prior to 30 calendar days after the first day of the borrower's program of study. Once your school receives notice from the Department that your school's official cohort default rate is 5.0 percent or greater, this benefit will end within 30 calendar days of the notification.

An institution with a cohort default rate of less than 10 percent for each of the three most recent fiscal years for which data are available, including eligible foreign institutions, may disburse, in a single installment, loans that are made for one semester, one trimester, one quarter, or a four-month period. Such an institution is also no longer required to delay the delivery or disbursement of the first disbursement of a loan for 30 days for first-time, first-year undergraduate borrowers. (Refer to DCL ID: GEN-06-02: FP-06-01 <http://www.ifap.ed.gov/dpcletters/GEN0602.html>).

For more information on the sanctions and the benefits associated with official cohort default rates, please refer to Chapter 2.4 of the Cohort Default Rate Guide, Cohort Default Rate Effects, available at <http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html>.

WHY DOES THIS LETTER SAY THAT MY SCHOOL IS NOT SUBJECT TO SANCTIONS BUT MY RATES EXCEED THE SANCTION THRESHOLD?

If your school has official FY 2007, FY 2006, and FY 2005 cohort default rates that are 25.0 percent or greater or your school has an official FY 2007 cohort default rate that is greater than 40.0 percent, your school is NOT subject to the loss of FFEL Program, Direct Loan Program, and/or Federal Pell Grant Program eligibility because your school met one or more of the following criteria:

Official Cohort Rate 2007 (2)

FY 2007, FY 2006, FY 2005 Cohort Default Rates >= 25.0%	FY 2007 Cohort Default Rate > 40.0%
At least two of your school's three most recent cohort default rates are official average cohort default rates and would be less than 25.0 percent if the Department had calculated the rate using the data for that cohort fiscal year alone.	Your school's FY 2007 cohort default rate is an official averaged cohort default rate.
Thirty or fewer borrowers entered into repayment during your school's three most recent official cohort default rates.	
Your school submitted a successful participation rate index challenge/appeal based on your school's draft FY 2007 cohort default rate, official FY 2006 cohort default rate, or official FY 2005 cohort default rate.	
Your school entered into a settlement agreement with the U.S. Department of Education that supersedes any sanctions the Department would apply based on cohort default rate calculations.	

WHAT RIGHTS DOES MY SCHOOL HAVE TO APPEAL THIS RATE INFORMATION?

Based on your school's FY 2007 cohort default rate, your school may be eligible to submit the following adjustments/appeals:

Uncorrected Data Adjustment

<http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html>

Loan Servicing Appeal

<http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html>

New Data Adjustment

<http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html>

Averaged Rates Appeal

<http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html>

Thirty-or-fewer Borrowers Appeal

<http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart4.html>

Your timeframe for submitting these adjustments and appeals begins on the sixth business day after the Department transmitted the cohort default rate notification package to the SAIG destination points. The Department announces the transmittal date for every cohort default rate distribution at <http://www.ifap.ed.gov>.

All schools must meet the established submission timeframes for cohort default rate adjustments and appeals. The Department will not review adjustments and appeals that any school submits outside of the established timeframes.

WHAT TOOLS AND INFORMATION ARE AVAILABLE TO HELP MONITOR AND MANAGE MY SCHOOL'S COHORT DEFAULT RATE?

Tools Information	Description	Contact Information
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Official Cohort Rate 2007 (2)

Cohort Default Rate Guide	<p>http://www.ifap.ed.gov/DefaultManagement/finalcdrg.html. Reference tool designed by U.S. Dept of Education to help schools understand cohort default rates and various challenge/appeal/adjustment processes. Original hardcopy mailed with FY 1999 notification letter. The electronic version was revised August 2006 and may be found online.</p>	May be printed from CDR Guide Link
Cohort Default Rate Guide Quick Reference	<p>The Cohort Default Rate Guide Quick reference at http://ifap.ed.gov/DefaultManagement/CDRQuickReference.html presents some of the key elements of the Guide in a more informal manner to give schools a summary of what they should do during the draft and official cohort default rate cycles.</p>	May be printed from CDR Quick Reference Link
Default Prevention and Mgmt Website	<p>http://ifap.ed.gov/DefaultManagement/DefaultManagement.html. Contains valuable information for schools, guaranty agencies and borrowers. Contains link for eCDR process, including enrollment procedures and downloading instructions.</p>	Default Prevention and Management 202-377-4259
NEW eAppeals	<p>Electronic Cohort Default Rate Appeals Process</p> <p>eCDR Appeals facilitates the exchange of information between parties for three of the challenge/adjustment processes: Incorrect Data Challenge (IDC), Uncorrected Data Adjustments (UDA), and New Data Adjustments (NDA). The application allows schools to electronically submit these challenges and adjustment requests during a cohort default rate cycle, and allows data managers (guaranty agency or Direct Loan Servicer) and Federal Student Aid (FSA) personnel to electronically view and respond to challenges and adjustment requests. The application tracks the entire life cycle of each challenge/adjustment request from the time the case is submitted until the time a decision is made and the case is closed.</p> <p>This electronic process will eventually replace the paper process of challenging and appealing CDRs for all Title IV schools, foreign and domestic. However, use of eCDR Appeals is optional for schools at this time. All users must complete the registration process to gain access to eCDR Appeals. The eCDR Appeals homepage contains a link to the Registration and User Account Guide, which gives step-by-step instructions for registration. Links to the User Guides for the three processes can also be found here, as well as a link to the Cohort Default Rate Guide.</p> <p>Schools should refer to IFAP (www.ifap.ed.gov), Schools Portal (fsa4schools.ed.gov) or the Default Prevention and Management website (http://www.ifap.ed.gov/DefaultManagement/DefaultManagement.html) for updated information</p>	Default Prevention and Management 202-377-4259

Official Cohort Rate 2007 (2)

	on the eCDR Appeals process.	
Late Stage Delinquency Assistance (LSDA)	Process whereby schools work in collaboration with servicers or guarantors to identify and provide counseling to borrowers more than 240 days late on loan repayment. For Direct Loan schools, the website http://www.dlservicer.ed.gov/ identifies borrowers whose impending default will impact the school's cohort default rate. FFEL schools can obtain assistance for their late stage delinquent borrowers by contacting their servicer or guarantor.	Direct Loan Servicer 888-877-7658 (can guide you through the process)
National Student Loan Data System (NLSDS)	https://www.nslsdsfap.ed.gov . Offers schools the opportunity to request reports in extract or preformatted formats that can be retrieved through the Students Aid Internet Gateway(SAIG) account associated with the NLSDS User Id that requested the report. Listed below are some reports NLSDS offers.	NLSDS Customer Service at (800) 999-8219
Report name	Brief Description of the NLSDS Reports	
DRC035	School CDR Rate History Report provides school with a copy of the Loan Record Detail Report that lists students in default/repayment during the cohort period indicated.	
SCHER1	Enrollment Reporting Summary Report provides school users with the chronology of enrollment reporting events.	
DER001	Date Entered Repayment Report provides school users with a list of student borrowers with loan history who are scheduled to go into repayment during a specified date range.	
DRC015	School Repayment Information Loan Detail provides school users with the current repayment status of certain borrowers in FFEL/DL loan programs who attended a school during a specific period.	
SCH01B	Exit Counseling Report provides school users with exit counseling information on students who attended the requesting school and whose anticipated completion dates fall within a specified date range.	

Additional tools and information may be found in Chapter 3.2 of the Cohort Default Rate Guide, Monitoring Loan Repayment Status Year-Round, available at <http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart3.html>

If you have any questions about this letter that are not answered in the Cohort Default Rate Guide, please contact Portfolio Performance Division, formerly Default Prevention and Management via email at FSA.Schools.Default.Management@ed.gov or via phone at (202) 377-4259. Please be sure to include your Office of Postsecondary Education Identification Number (OPE ID) on all correspondence, as shown on page one of this letter.

sincerely,

Official Cohort Rate 2007 (2)

Katrina Turner
Director
Portfolio Performance Division
Business Operations

Enclosures

OPEID: 009618
School Name: Tulsa Welding School
City and State: Tulsa, OK 74104-3909

The Department's records indicate the following with regard to your school's loan program participation:

CERTIFIED FFEL

CERTIFIED DIRECT LOAN

Based on borrower participation in the FFEL Program and/or Direct Loan Program at your school, here are the FY 2007, FY 2006 and FY 2005 official cohort default rates on record for your school:

Fiscal Year 2007

- (1) Number of borrowers entering repayment: 806
- (2) Number of borrowers who entered repayment and defaulted: 38
- (3) Official Cohort Default Rate: 4.7%
- (4) Rate Type: FL

Fiscal Year 2006

- (1) Number of borrowers entering repayment: 774
- (2) Number of borrowers who entered repayment and defaulted: 2
- (3) Official Cohort Default Rate: 0.2%
- (4) Rate Type: FL

Fiscal Year 2005

- (1) Number of borrowers entering repayment: 766
- (2) Number of borrowers who entered repayment and defaulted: 14
- (3) Official Cohort Default Rate: 1.8%
- (4) Rate Type: FL

The rate type indicates the category of loans that the Department included in your school's cohort default rate:

FL-FFEL Program loans only

DL-Direct Loan Program loans only

DU- both FFEL Program and Direct Loan Program loans

For additional information on the methodology that the Department uses to calculate cohort default rates, please refer to the Chapter 2.1 of the Cohort Default Rate Guide, How the Rates are Calculated, available at <http://ifap.ed.gov/DefaultManagement/guide/04CDRGuidePart2.html>.

Average Debt upon Graduation

FY 09

	Average of TotalDebt	Count of Students
TWS-Jacksonville Campus	\$9,875.74	666
TWS-Tulsa Campus	\$10,141.77	684
Grand Total	\$10,010.53	1350

Cohort Graduation Rate



COLLEGENavigator

Tulsa Welding School

2545 E. 11th Street, Tulsa, Oklahoma 74104-3909

General Information:	(918) 587-6789
Website:	www.weldingschool.com
Type:	2-year, Private for-profit
Awards offered:	Less than one year certificate One but less than two years certificate Associate's degree
Campus setting:	City: Large
Campus housing:	No
Student population:	855 (all undergraduate)
Student-to-faculty ratio:	20 to 1



IPEDS ID: 207962
OPE ID: 00961800

GENERAL INFORMATION

TUITION, FEES, AND ESTIMATED STUDENT EXPENSES

FINANCIAL AID

NET PRICE

ENROLLMENT

ADMISSIONS

RETENTION AND GRADUATION RATES

FIRST-TO-SECOND YEAR RETENTION RATES

Retention rates measure the percentage of first-time students who return to the institution to continue their studies the following fall.

RETENTION RATES FOR FIRST-TIME STUDENTS



Percentage of Students Who Began Their Studies in Fall 2008 and Returned in Fall 2009

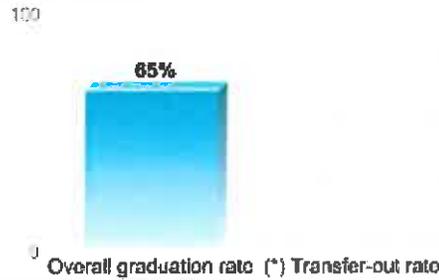
OVERALL GRADUATION RATE AND TRANSFER-OUT RATE

The overall graduation rate is also known as the "Student Right to Know" or IPEDS graduation rate. It tracks the progress of students who began their studies as **full-time, first-time degree- or certificate-seeking students** to see if they complete a degree or other award such as a certificate within 150% of "normal time" for completing the program in which they are enrolled.

Some institutions also report a transfer-out rate, which is the percentage of the full-time, first-time students who transferred to another institution.

Note that not all students at the institution are tracked for these rates. Students who have already attended another postsecondary institution, or who began their studies on a part-time basis, are not tracked for this rate.

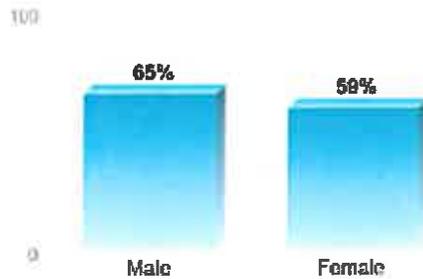
OVERALL GRADUATION AND TRANSFER-OUT RATES FOR STUDENTS WHO BEGAN THEIR STUDIES IN 2006-07



Percentage of Full-time, First-Time Students Who Graduated or Transferred Out Within 150% of "Normal Time" to Completion for Their Program

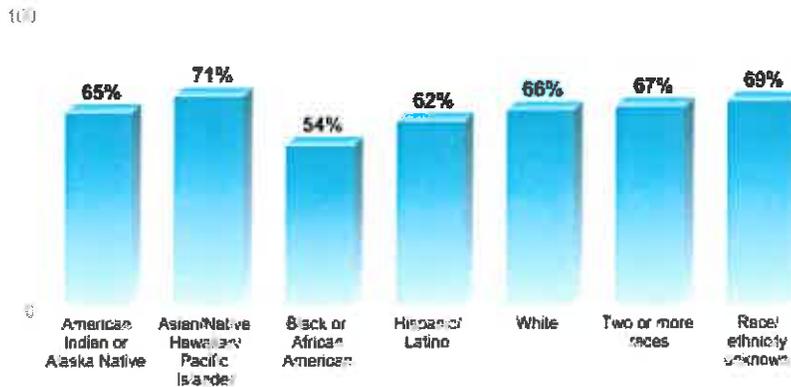
■ (*) Not all institutions report transfer-out rates.

OVERALL GRADUATION RATE BY GENDER



Percentage of Full-time, First-time Students Who Began Their Studies in 2006-07 and Graduated Within 150% of "Normal Time" to Completion for Their Program

OVERALL GRADUATION RATE BY RACE/ETHNICITY

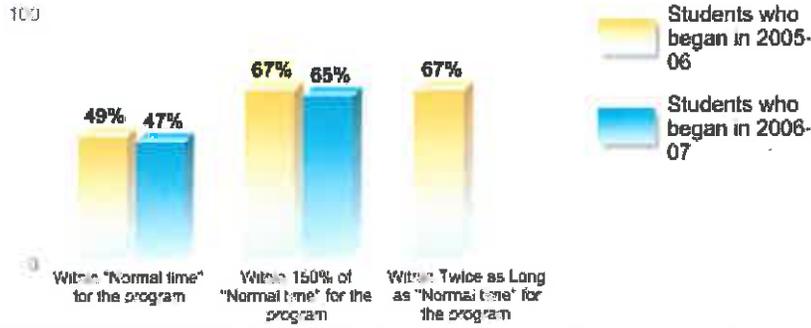


Percentage of Full-time, First-time Students Who Began Their Studies In 2006-07 and Graduated Within 150% of "Normal Time" to Completion for Their Program

GRADUATION RATES BY TIME TO COMPLETION

Graduation rates can be measured over different lengths of time. "Normal time" is the typical amount of time it takes full-time students to complete their program. For example, the "normal" amount of time for many associate's degree programs is 2 years. Not all students complete within the normal time, so graduation rates are measured by other lengths of time as well, including "150% of normal time" (e.g., 3 years for a 2-year program) and "200% of normal time," or twice as long as the normal time (e.g., 4 years for a 2-year program).

GRADUATION RATES FOR STUDENTS WHO BEGAN THEIR PROGRAM IN 2005-06 OR 2006-07, BY TIME TO COMPLETION



Percentage of Full-time, First-time Students Who Graduated in the Specified Amount of Time

- [PROGRAMS/MAJORS](#)
- [VARSITY ATHLETIC TEAMS](#)
- [ACCREDITATION](#)
- [CAMPUS SECURITY](#)
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Tulsa Welding School-Jacksonville Campus

3500 Southside Blvd, Jacksonville, Florida 32216

General information: (877) 935-3529
Website: www.weldingschool.com
Type: < 2-year, Private for-profit
Awards offered: Less than one year certificate
 One but less than two years certificate
Campus setting: City: Large
Campus housing: No
Student population: 839 (all undergraduate)
Student-to-faculty ratio: 20 to 1



IPEDS ID: 442329
 OPE ID: 00961802

GENERAL INFORMATION

TUITION, FEES, AND ESTIMATED STUDENT EXPENSES

FINANCIAL AID

NET PRICE

ENROLLMENT

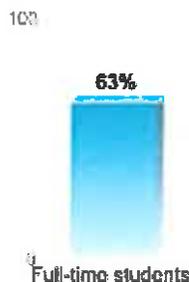
ADMISSIONS

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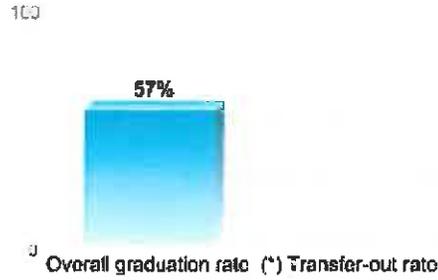
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OVERALL GRADUATION AND TRANSFER-OUT RATES FOR STUDENTS WHO BEGAN THEIR STUDIES IN 2006-07



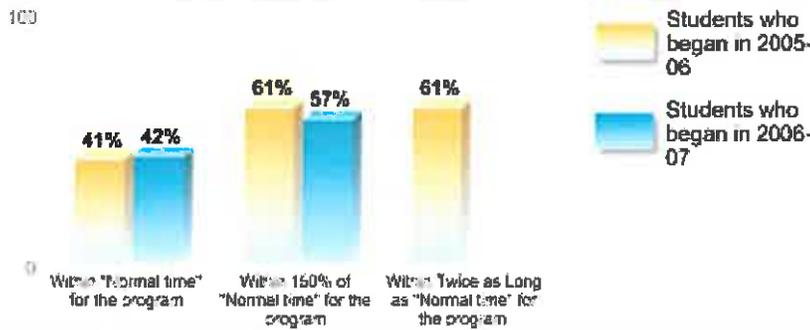
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