



Accrediting Commission of Career Schools and Colleges

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May 29, 2019

**ELECTRONIC DELIVERY**

██████████  
Director  
River Valley School of Massage  
2003 E. Parkway Drive  
Russellville, Arkansas 72802

*School #M072369*  
*Continued Probation*

Dear ██████████:

At the May 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to place River Valley School of Massage (“RVSM”) located in Russellville, Arkansas on Probation. Upon review of the November 28, 2018 Probation Order and the school’s response, the Commission voted to continue RVSM on Probation with a subsequent review scheduled for ACCSC’s **August 2019** meeting. The reasons for the Commission’s decision are set forth below.

**History of the Commission’s Review:**

**August 2017**

At the August 2017 meeting, the Commission considered the school’s Application for Renewal of Accreditation and voted to defer final action for additional information in the following areas: financial structure; documentation of initial employment of graduates; student achievement rates for the 6-month and 9-month Massage Therapy programs; leave of absence policy; advertising; and attentiveness to student needs.

**May 2018**

At the May 2018 meeting, the Commission again considered the Application for Renewal of Accreditation. Additionally, the Commission considered information provided by RVSM in support of its reported rates of student achievement captured in the school’s 2017 ACCSC Annual Report. Upon review of the November 8, 2017 deferral letter, February 12, 2018 letter regarding rates of student achievement, and the school’s respective responses, the Commission again voted to defer final action for additional information in the following areas: financial structure, student achievement rates for the 6-month and 9-month Massage Therapy programs, and the leave of absence policy.

**November 2018**

At the November 2018 meeting, the Commission considered its previous decision to defer action on the Application for Renewal of Accreditation submitted by the school. The Commission considered the school’s overall financial structure and had concerns regarding the school’s financial soundness. In addition, the Commission again considered information provided by RVSM to support the below benchmark rates in the Massage Therapy 9-month and 6-month programs. The Commission voted to place the school on Probation and required additional information regarding the school’s financial structure and student achievement rates for the Massage Therapy 9-month and 6-month programs.

**May 2019**

1. RVSM must demonstrate that the school’s financial structure is sound with resources sufficient for the proper operation of the school and discharge of obligations to students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). A review of RVSM’s internally prepared financial statements for twelve-months to cover the period of January 1, 2018 through December 31, 2018 showed [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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<sup>1</sup> The Commission will also review the school’s December 31, 2018 fiscal year ended audited financial statements, due in accordance with ACCSC’s normal requirements, on June 30, 2019.



reasons for the low employment rates and does not show that the school implemented new strategies that specifically target improving employment rates.

Furthermore, RVSM provided the school's plans to assist students and graduates with the Massage Therapy licensure examination process and assisting student with MBLEx preparation that included the following:

- *Administering weekly computer-based, multiple-choice tests to students on the subject matter scheduled for that week.*
- *Full discussion of the licensure process during Week 11: Arkansas State Law.*
- *Comprehensive, computer-based, final exam comprised of 100 multiple choice questions in the same subject area distribution as the MBLEx exam.*
- *Opportunities for graduates to return to the classroom for a refresher if the graduate does not successfully pass the MBLEx.*
- *Providing information in the classrooms about the MBLEx (posters), which include the content areas of the exam.*

RSVM also explained that the school reported 15 graduates as "Available for Employment" in the Graduation and Employment Chart and that of those 15 graduates, 12 graduates took the MBLEx exam and 10 passed making the licensure pass rate 83%. RVSM also explained that the school reported six graduates as "Available for Employment" on the Graduation and Employment Chart who are not employed as Massage Therapists. Of the six graduates reported on the Graduation and Employment Charts as graduates; three graduates did not attempt the MBLEx exam, two graduates attempted the MBLEx exam and did not pass; and one graduate passed the MBLEx exam. The results of the analysis appear to indicate that while RSVM reported an acceptable licensure pass rate that exceeds the national MBLEx pass rate requirement of 67.8%, the issue remains that few graduates are completing the exam and regardless of licensure, graduates are not gaining employment as Massage Therapists.

RSVM provided the school's ongoing initiatives to obtain graduate employment verification, including:

1. *Contacting graduates or employers directly to verify employment;*
2. *Contacting graduates who have not yet received an Arkansas massage therapy license to determine what interrupted their pursuit of a license that would lead to a career in the field in which they studied; and*
3. *Contacting graduates who indicated that further education was in their plans to obtain verification that the graduate has, in fact, enrolled in a program of study in lieu of obtaining employment.*

RSVM stated that the school had limited success with the aforementioned approaches because not all graduates respond to the school's requests for information and employment verification. The Commission noted, however, that RSVM did not provide a detailed analysis as to the reasons why the school believes graduates do not respond to the school's requests and did not provide potential ideas to encourage graduates to respond.

RVSM also provided results of an admissions study and changes made to the admissions requirements and process based on the study. The school's response states:

*The previous response to ACCSC, RVSM noted that its program advisory committee discussed the introduction of an admissions test at its September 2018 PAC meeting. While the PAC did not suggest any changes to the policy or the introduction of an admissions test, the discussion centered on identifying students who may not have the aptitude or desire to pass the MBLEx exam upon completion of the RVSM program of study. As a result of the PAC's comments, RVSM has reviewed its admissions policy, as noted below, and had determined that no change is warranted at this time.*

The Commission noted from the school's PAC meeting minutes that the PAC provided a number of strategies and ideas that may improve exam pass rates and employment rates including:

- Conducting an entrance exam to help deter prospective student from starting a program that they may not be successful in completing;
- Providing \$200-\$300 to cover the cost of the exam for those student who maintain a good GPA; and
- Incorporating an entrance/admissions questionnaire that asks prospective students about study habits, motivation, and the ability to take the MBLEx.

RVSM also included as part of its admissions study a narrative regarding comparable massage schools and those schools' admissions requirements. Although RVSM noted that while the school did find that one Arkansas school with a massage therapy program requires successful completion of an exam as part of the admissions process, RVSM stated this "did not present a case for modifying the RVSM admission criteria at this time."

Furthermore, RVSM provided student survey results for 2017 and 2018 and an analysis of those surveys. The analysis states:

*The survey shows that RVSM has enrolled students who plan to pursue a career in massage therapy. For students in the 2017 survey, five of the six students or 83% plan to seek employment (excludes those who plan to pursue additional education after graduation). In the 2017-2018 Survey, 100% of the students plan to seek employment after graduation (excludes those who plan to pursue additional education). At some point during or after their RVSM education, graduates opted not to take the MBLEx and/or pursue Arkansas licensure to begin a as a massage therapist. As noted earlier, for students who attempt the MBLEx, RVSM results are better than the national average, so we believe that the graduates are prepared for this comprehensive exam. In addition, the employment rate of licensed RVSM graduates is 100%, indicating that there are jobs available for graduates who choose to work in the field. The school will continue to research additional services to support graduates as they pursue the licensure process following graduation, including registration for the MBLEx.*

The Commission acknowledged that the school is considering ways to address the root causes of the low employment rates and that the school may be considering changes to the admissions process and placement assistance. RVSM' response, however; does not demonstrate that the school has at this time made significant changes or improvement based on the admissions study, PAC feedback, or the results from the licensure exam data. Overall, the Commission found that RVSM continues to report below benchmark employment rates and has failed to create effective strategies and to implement new strategies to improve student achievement rates. RVSM also failed to assess the reasons why graduates are not choosing to take the MBLEx and regardless of licensure are not gaining employment as Massage

Therapists. RVSM also did not demonstrate that the school devoted sufficient resources to the implementation of strategies and action plans.

Based on the foregoing, the Commission directs RVSM to provide the following:

- a. An updated description of the strategies the school is implementing to improve the reported employment rates for the 9-month and 6-month Massage Therapy programs, to include:
  - i. The school’s plans for ensuring that the school is admitting students who are likely to complete the program, including changes to the admissions requirements;
  - ii. The school’s plans to assist and encourage graduates to take the MBLEx;
  - iii. The school’s plans to assist graduates with gaining employment as a Massage Therapist; and
  - iv. The resources the school devoted to support the strategies and plans in response to i-iii.
- b. An assessment of the success of the plans from a.) above to include results from conducted admissions studies, PAC feedback, and resources the school devoted to improving employment rates and encouraging completion of the MBLEx.
- c. An updated description regarding the school’s ongoing initiatives and efforts to obtain graduate employment verification and assessment of those efforts.
- d. A Graduation and Employment Chart for the 9-month and 6-month Massage Therapy programs using an **July 2019** Report Date.
- e. Supporting summary information for each Graduation and Employment Chart as follows:
  - i. For each student start, provide the following information:

Student ID#	Program	Start Date	Graduation Date	Withdrawal/Termination Date

- ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following information:

Student ID#	Program	Start Date	Reason Unavailable	Description of the Documentation on File

- iii. For each graduate classified as employed in the field<sup>3</sup> (line #14), provide the following information:

Graduate ID#	Program	Start Date	Graduation Date	Employer, Address, & Ph. #	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification <sup>4</sup> (i.e., graduate or employer)

- iv. Supporting and verifiable documentation or a narrative justification for each graduate in (iii.) above whose descriptive job title or place of employment does not appear directly related to the graduate’s program of study;
- v. For each graduate classified as employed in the field from in the list in (iii) above, submit a copy of the school’s verifiable record of employment such as completed employment verification forms for each;

<sup>3</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

<sup>4</sup> Appendix VII (4)(a) Guidelines for Employment Classification requires the school to verify the employment classification.

- vi. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Graduate ID#	Program	Start Date	Description of the Documentation on File

- vii. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following information:

Graduate ID#	Program	Start Date	Classification on the Graduation and Employment Chart	Reason	Description of the Documentation on File

and

- f. Any additional information, to include contemporaneous retention, graduation, or employment data, that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s student achievement outcomes requirements.

**PROBATION REQUIREMENTS:**

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

The Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in *Section IV, Rules of Process and Procedure, Standards of Accreditation*.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with *Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation*, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with *Section VII (L)(7), Rules of Process and Procedure, Standards of Accreditation*, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.

**TEACH-OUT PLAN REQUIREMENT**

Given the serious nature of the issues outlined herein, the Commission directs the school to provide an [ACCSC Institutional Teach-Out Plan Approval Form](#) which must be submitted as part of the response for the items listed above.

### **MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:**

Based on *Section VII (M), Rules of Process and Procedures, Standards of Accreditation* and the school's longest program of 9 months, the maximum timeframe allowed for continued attention towards ensuring to achieve and demonstrate compliance with the *Standards of Accreditation* is twelve months. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on **November 28, 2019**. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

### **NOTIFICATION TO STUDENTS:**

The school must inform current and prospective students in writing that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission's website (*Section VII (L)(7) Rules of Process and Procedure, Standards of Accreditation*).

### **RESPONSE REQUIREMENTS:**

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

RVSM must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.<sup>5</sup> If the school's 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.

RVSM must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for College 360 DMS Submissions can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before July 11, 2019**. If a response, the required fee,<sup>6</sup>

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<sup>5</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at [www.accsc.org](http://www.accsc.org).

<sup>6</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation.

and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before July 11, 2019**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED].

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.  
Executive Director

c: [REDACTED]  
[REDACTED]