

September 5, 2018

**ELECTRONIC DELIVERY**

██████████  
Director  
Myotherapy College of Utah  
336 W. Bugatti Dr.  
Salt Lake City, Utah 84115

*School #M059788*  
*Probation Order*

Dear ██████████

At the August 2018 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the previous decision to continue Myotherapy College of Utah (“MCU”) located in Salt Lake, Utah on Warning. Upon review of the Commission’s April 4, 2018 letter regarding the continued Warning Order and the school’s response, the Commission voted to place MCU on Probation with a subsequent review scheduled for ACCSC’s February 2019 meeting. The reasons for the Commission’s decision are set forth below.

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

At the November 2016 meeting, the Commission considered the Application for Renewal of Accreditation submitted by MCU located in Salt Lake, Utah. The Commission voted to defer final action on MCU’s Application for Renewal of Accreditation until the May 2017 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards. Specifically, the Commission determined that the school had had yet to demonstrate compliance with accrediting standards in the following areas:

- Employment verification;
- Institutional assessment and improvement planning activities;
- Admissions documentation;
- Program Advisory Committee;
- Advertising;
- Application Fee Refund; and
- Records.

At the May 2017 meeting, the Commission considered the previous decision to defer final action on the Application for Renewal of Accreditation, the 2016 ACCSC Annual Report, and financial statements for fiscal years-ended June 30, 2016 and 2015 submitted by MCU located in Salt Lake, Utah. The Commission voted to place MCU on Warning with a review scheduled for the November 2017 meeting. Specifically, the Commission determined that the school had yet to demonstrate compliance with accrediting standards in the following areas:

- Financials;
- Employment verification;
- Student Outcomes;
- Institutional assessment and improvement planning activities;

- Admissions documentation;
- Attendance Policy;
- Program Advisory Committee; and
- Advertising.

At the November 2017 meeting, the Commission considered the previous decision to place the school on Warning in the matter of the Application for Renewal of Accreditation, the 2016 ACCSC Annual Report, and financial statements for fiscal years-ended June 30, 2016 and 2015. The Commission voted to continue MCU on Warning with a review scheduled for the August 2018 meeting. Specifically, the Commission determined that the school had had yet to demonstrate compliance with accrediting standards in the following areas:

- Financials;
- Employment verification;
- Student Outcomes; and
- Attendance Policy.

**August 2018 Commission Review and Action:**

1. MCU must demonstrate that the school’s financial structure is sound with resources sufficient for the proper operation of the school and the discharge of obligations to its students (*Section I (C)(1), Substantive Standards, Standards of Accreditation*). [REDACTED]

[REDACTED]

[REDACTED]

1. [REDACTED]

1. [REDACTED]

1. [REDACTED]

1. [REDACTED]

[REDACTED]



While the Commission recognized MCU’s continued efforts to improve its financial position, mainly through expanding operations and cost reductions, the Commission is concerned regarding the school’s financial soundness and as such directs MCU to submit the following:

- a. Audited financial statements for the fiscal year-end June 30, 2018, prepared in accordance with requirements set forth in ACCSC’s [Instructions for the Preparation and Submission of Financial Statements and Related Information](#);
  - b. Internally prepared financial statements for six-months to cover the period of July 1, 2018 through December 31, 2018, also prepared and submitted in accordance with requirements set forth in ACCSC’s [Instructions for the Preparation and Submission of Financial Statements and Related Information](#);
  - c. An updated MD&A narrative examining and explaining MCU’s current financial condition and ability to project future financial soundness that minimally includes the following:
    - i. A discussion that addresses MCU’s financial performance goals and results;
    - ii. MCU’s financial improvement plan that will return the school to a sound financial position (i.e., profitability);
    - iii. MCU’s anticipated future demands, events, conditions, and trends that may impact the school; and
    - iv. Specific comments relative to the school’s financial position and condition, its revenues and costs, assets and liabilities, and other obligations and commitments;
  - d. The school’s fiscal year 2019 budget and a budget-to-actual analysis for the six-month period of July 1, 2018 to December 31, 2018; and
  - e. Any other information or documentation that MCU believes will assist the Commission in its review of the school’s financial position.
2. MCU must demonstrate successful student for the 8-month Massage Therapy-Basic Core program through reporting acceptable rates of graduate employment in the field of study (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The Massage Therapy-Basic Core (Certificate) program is the sole program offered at MCU. The Commission noted the history of student achievement outcomes in this program over the last term of accreditation, as follows:

Name of Program (Credential)		
Annual Report	Graduation	Employment
2017	81%	68%
2016	81%	52%
2015	97%	78%
2014	84%	86%
2013	89%	91%
2012	87%	81%

The Commission noted the steep decline in rates of graduate employment from the 2015 to 2016 Annual Reports. Although the rates reported on the 2017 Annual Report showed significant improvement, the rate still falls below ACCSC's benchmark. The Commission, via the April 4, 2018 continued Warning Order, directed MCU to provide an updated description of the factors impacting successful student achievement in the 8-month Massage Therapy-Basic Core program and an updated description of the strategies implemented to overcome those factors. According to the school's response, the factors impacting the employment rates include:

- *Change in Student Situation*
  1. *Pregnancy – Other Family Conditions*
  2. *Finances – No longer need employment*
- *Insecurity – Have impression MT is not enough income or is too much work*
- *Insecurity/Anxiety – Lack of confidence in ability to perform adequately.*
- *Loss of interest/change of interest*

Although the response provides a thorough description of the strategies implemented by MCU to improve graduation rates, the response does not address improvement of employment rates. The Commission reminds the school that the lower rate at which graduates are obtaining employment in the field that is under review.

As part of the April 4, 2018 continued Warning Order, the Commission afforded MCU the opportunity to provide an additional Graduation and Employment Chart prepared using a Report Date of May 2018. The school provided two identical copies of a document that resembles a Graduation and Employment Chart; however, it is presented in sections over three pages as opposed to a single page. In addition, while there are percentages in the cells for graduation rate and employment rate, the cells that would normally display total numbers of students in each category are blank. As a result, although the school reports above-benchmark rates of graduation (75%) and employment (71%), it is not clear that the school provided the data in accordance with the instructions on the Graduation and Employment Chart. Therefore, the Commission will review updated Graduation and Employment Chart, prepared in accordance with accrediting standards, to ensure that graduation and employment rates meet or exceed benchmarks.

In addition to an updated Graduation and Employment Chart, the Commission directed the school to provide information about the most recent 25 graduates from the program, to provide an indication as to whether the school's strategies will be successful in improving employment rates. Of the 25 graduates, the school provided employment information for 5, which does not support a conclusion that the employment rate is improving. The Commission recognized that for the more recent graduates, particularly those who graduated in May and June 2018, insufficient time had elapsed to secure documentation of employment in field. Therefore, the Commission determined to afford the school an additional opportunity to show that the group of 25 graduates has successfully achieved the goals of the program.

Based on the foregoing, the Commission determined that the school has yet to demonstrate successful student achievement in the Massage Therapy-Basic Core (Certificate) program. This is of critical important to the institution, as it is the only program offered. Accordingly, the Commission directs the school to submit the following:

- a. A Graduation and Employment Chart for the **8-month Massage Therapy-Basic Core** program using an **October 2018 Report Date**.
- b. Summary information for the Graduation and Employment Chart organized according to the corresponding **cohort start date** reported on the chart (line #1) 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>1</sup> (line #14), provide the following information:

Graduate ID#	Program	Start Date	Employer Name, Address, & Ph.#	Employer Point of Contact	Date of Initial Employment	Descriptive Job Title and Responsibilities	Source of Verification <sup>2</sup> (i.e., graduate or employer)

- iv. 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

- v. From the list in (iv.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

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

- vi. 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 G&E Chart	Reason	Description of the Documentation on File

- c. An updated description of the factors impacting successful student achievement in the 8-month Massage Therapy-Basic Core program, an updated description of the strategies implemented to overcome those factors, and an analysis and assessment of the effectiveness of the school’s efforts.
- d. Provide the same list of 25 graduates as provided in the July 13, 2018 response, in the format of the following table, with each graduate’s current employment status:

<sup>1</sup> See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

<sup>2</sup> Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

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

- e. Any other information or 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.
3. MCU must demonstrate that the school supports reported rates of student achievement through verifiable records of initial employment (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation, Appendix VII*). The Commission’s review of this matter began with the November 2016 consideration of the school’s Application for Renewal of Accreditation. The May 25, 2016 TSR raised questions with regard to the school’s policies and procedures for maintaining verifiable records of initial employment in accordance with the *Guidelines for Employment Classification – Appendix VII of the Substantive Standards, Standards of Accreditation*. MCU has yet to present employment records or written policies and procedures that show the school’s mechanism for maintaining initial employment records results in compliance with accrediting standards.

**Policies and Procedures**

With the July 13, 2018 response, MCU provided a two-page document titled “Myotherapy College of Utah Placement Policy.” According to the policy,

*Once the student graduates, the Placement Director communicates (in-person, text, email and phone) to determine the graduate’s employment classification:*

1. *Employed in Field*
2. *Employed Other Field*
3. *Further Education*
4. *Unemployed*
5. *Unavailable*
6. *Unknown*

The school’s policy lists the types of documentation that are required to support each classification listed above. For regular employment, the policy requires that the Placement Director fill out a “Placement Verification Form,” and the employer to complete an “Employment Verification Form.” It is not clear why the school uses two different forms. The Commission noted that the Placement Verification Forms are not consistently completed, which leads to an impression that the employment records are missing required information, In addition, the Commission noted that the Guidelines for Employment Classification allow for the school to collect written documentation from the graduate or the employer, however, MCU appears to limit written documentation to the employer only, as follows:

*If the graduate is “Employed in Field”, verifiable records include:*

1. *A copy of their Massage Therapy License,*
2. *A completed Employment Verification Form from the employer*
3. *A completed Placement Verification Form filled out by the Placement Director.*

In addition, the Commission noted that the school's policies and procedures do not include a provision for verbal verification of employment information. For self-employed graduates, the school's policy requires that the Placement Director complete a Placement Verification Form, and that the graduate sign a "Self-Employment Acknowledgement Form" and provide a copy of a business license and a copy of their schedule or client list. The Commission noted that the *Guidelines for Employment Classification* allow the school to rely on the written attestation of the graduate, as long as it includes all required elements. The business license, schedule and client list are not required by accrediting standards.

*If the graduated is "Self Employed" verifiable records include:*

1. *A copy of their Massage Therapy License,*
2. *A completed Placement Verification Form filled out by the Placement Director,*
3. *A signed Self Employment Acknowledgement Form and one of the following:*
  - a. *a copy of their Business License,*
  - b. *a copy of their schedule or a client list with no personal info.*

In addition to employment records, the policy outlines the documentation to be collected for other categories reported on the Graduation and Employment Chart including "further education" and "unavailable for employment." The Commission found, however, that the policy is not sufficient to ensure adequate documentation because the policy indicates that the school maintains "documentation of the conversation with the graduate via email or phone conversation." In these cases, an attestation or verbal verification from the graduate is insufficient.

- In order to classify a graduate as "Graduate-Further Education," the school must document that the graduate continued on with education in an accredited institution of higher education (postsecondary) on at least a half-time basis. Acceptable documentation might take the form of an official schedule, transcript, or enrollment verification from the other school, or a printout from the National Student Loan Data System showing a subsequent enrollment.
- In order to classify a graduate as "Graduate-Unavailable for Employment," the school must document that the graduate is appropriately removed from the employment rate calculation due to death, incarceration, active military service deployment, the onset of a medical condition that prevents employment, or international students who have returned to their country of origin. Acceptable documentation for these categories includes (but is not limited to): a copy of a published obituary or death notice, arrest records, copies of military orders, written confirmation from a healthcare provider, and a copy of the student's visa.

Based on the foregoing, the Commission found MCU's written policies and procedures do not yet demonstrate that the school has appropriate mechanisms in place to maintain verifiable records of student achievement outcomes.

### **Documentation**

The school's response includes a list of the 15 students who graduated from the school between October 1, 2017 and February 28, 2018. Of those 15 graduates, the chart indicates that 8 graduates are employed in field with confirming documentation. Another two graduates are listed as employed, but the school is waiting on a response from the employer. The Commission reviewed the employment documentation provided for the graduates reported to be "employed" and found the following records appear to constitute a verifiable record:

- Student ID: [REDACTED] listed as “employed-received confirmation.” The response includes an Employment Verification Form signed by the employer contact listed on the form and documentation of licensure.
- Student ID [REDACTED] listed as “employed received confirmation.” The response includes an Employment Verification Form that has a typewritten name in the signature block for the employer. The response also includes documentation of licensure.
- Student ID [REDACTED] reported as self-employed. The response includes a signed attestation that incorporates all elements required by the standards and documentation of licensure.
- Student ID [REDACTED] reported as employed received confirmation. The response includes an Employment Verification Form signed by the employer contact and documentation of licensure.
- Student ID [REDACTED] reported as “employed received confirmation.” The response includes an Employment Verification Form signed by the employer contact and documentation of licensure.
- Student ID [REDACTED] reported as “employed received confirmation.” The response includes an Employment Verification Form signed by the employer contact and documentation of licensure.
- Student ID [REDACTED] reported as “employed waiting on response from employer.” The response includes a printout of a texted exchange between the student and the school representative regarding her employment at a chiropractic office.
- Student ID [REDACTED] reported as “employed received confirmation.” The response includes an Employment Verification Form signed by the employer contact and documentation of licensure.
- Student ID [REDACTED] reported as “employed received confirmation.” The response includes an Employment Verification Form signed by the employer contact and documentation of licensure.

The Commission reviewed the employment documentation and found the following records do not appear to constitute a verifiable record:

- Student ID [REDACTED] reported as employed-waiting on response from employer. The Placement Verification Form presented in the response is missing the following information: the employer phone number, employer address, employer contact name and title. In addition, the response includes a copy of an e-mail from the student informing the school that she is employed at [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

The Commission recognized the improvements that the school has made to recordkeeping procedures, however, the school’s response still raises questions about the policies and procedures for securing documentation to support data reported on the Graduation and Employment Chart. Therefore, the Commission is interested in reviewing updated policies and procedures and additional documentation. Accordingly, the Commission directs MCU to submit the following:

- a. A description of the school’s policies and procedures for verifying employment classifications, including the school’s policy with regard to the use of verbal verifications;
- b. A list of all students who graduated from the school between May 1, 2018 and July 31, 2018, in the following format;

Student Name	Program	Graduation Date	Employment Status (Employed in field, , further education, unavailable, unemployed, unrelated occupation, unknown)

- c. Verifiable records of initial employment for each student listed as “employed in field” in the table above;
  - d. For any graduates listed as self-employed, a copy of written documentation from the self-employed graduate verifying that the employment is valid including, at a minimum the attestations outlined in ACCSC’s *Guidelines for Employment Classification*;
  - e. Documentation to support the classification of each graduate reported to be engaged in further education, or unavailable for employment; and
  - f. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements.
4. MCU must demonstrate that the school enforces a policy of acceptable student attendance (*Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation*). In response to the questions regarding the school’s attendance policy, MCU stated:

*The intent of Attendance Policy is to assist students in achieving satisfactory attendance in clock-hour courses. Department of Education (DOE) requires 90% attendance of total program clock-hours. As such our attendance policy requires 90% of scheduled class sessions to be attended thus assisting students in meeting DOE attendance requirements. The majority of classes meet 10 times per term, so the allowed number of session absences is 1 of 10 scheduled class sessions. The procedure of the Attendance Policy alerts students to any absences allowing them to self-correct behavior and meet minimum requirements.*

Although the school’s narrative indicates that the attendance policy requires 90% attendance, the policy published in the catalog (page 34) and presented in the response states that the attendance requirements in terms of missed class periods in a 10-week term, as follows:

*[s]tudents may not miss more than one class period for a one-credit course; two class periods for a two-credit course; three class periods for a three-credit course. Being absent from a class (arriving late, leaving early) more than 15 minutes is accounted for as an absence.*

In addition to this requirement, certain courses require a stricter standard of attendance, described in the school’s narrative as follows:

*In summary, Courses falling outside the 10-week session scheduling, Student Clinic and Elective courses are held to a different, yet still strict standard of attendance. The scheduling/timing of class sessions for classes that meet in 10 weekly sessions allows for ongoing monitoring and management of attendance. Classes outside this regular scheduling are held to a stricter attendance requirement by essentially requiring an “all or nothing” pass/fail attendance standard. That 100% attendance requirement supersedes the standard allowing for 1 out of 10 sessions to be missed. The enforcement mechanism is that these courses or their substitutes, in the case of Electives, must be passed to complete the program and graduate.”*

The Commission found that the catalog now adequately describes these two facets of the attendance policy. According to the school’s policies and procedures for monitoring attendance and enforcing the attendance policy, MCU monitors attendance at the end of week two of the term, at the end of week 6

of the term, and at the end of the fourth week of the subsequent term. At the end of the second week of the first 10-week term, all students with one or more absences are sent a notification that “they have accumulated absences and are reminded of the limits to allowed absences and are encouraged to maintain attendance and consult with their instructors regarding makeups if applicable.”

The Commission raised questions with regard to the school’s policy around make-up work. According to page 34 of the catalog presented with the school’s response, “[s]tudents who need to complete make-up work must make arrangements with their instructors.” With regard to makeup work, the catalog (page 41) states that “[a]cademic Probation for Attendance may be remedied by completing make-up work, if allowed by the instructor.” The phrase “if allowed by the instructor” introduces a factor of variability that may prevent fair and consistent application of the attendance policy unless the school has provided guidance to the faculty as to how to consistently apply this provision.

Part of the challenge that MCU previously identified with regard to enforcing the attendance policy was the school’s previous information management system. The school’s response states that:

*During the period between October 2017 and February 2018 we began the transition from our old Student Information System, DiamondD and some information from Microsoft Access, to our new Student Information System, Orbund. Because of this, we experienced data transfer issues to our new Orbund system in January and February, which forced us to use a manual system to record student information and finances while working directly with the Orbund Data Migration Team to migrate that data.*

The school provided the following update regarding the status of the data migration project:

*We are currently working with and feel like good progress is being made in adapting their system to work with our policies, for example, allowing make-up attendance to be recorded on the same day as a regular attendance and recording makeup work/attendance after the “end” of a term (without disrupting the “end of a term” as defined by financial aid and other considerations regarding dates. There is some possibility that we may be required to modify our policies somewhat in compromise to make the relationship between Orbund and Myotherapy more elegant. We are encouraged by the helpfulness and willingness of the Orbund team to listen and go the extra mile in assisting us implement this new system.*

The Commission recognized that the school is working to ensure that the computer system adequately supports the success of students and is interested in an update on the status of that project.

Overall, the Commission found that MCU has yet to demonstrate that attendance and make-up policies are fully developed and can be applied consistently and fairly to support student’s successful achievement of the goals of the training. Accordingly, the Commission directs the school to submit the following:

- a. A description of the school’s policy regarding makeup work and an explanation as to how the school is able to implement and enforce this policy in a fair and equitable manner.
- b. A copy of MCU’s most recent catalog showing the publication of the school’s current policies with regard to attendance, make-up work, and satisfactory academic progress ;
- c. A list of students who were deemed to not meet the school’s attendance requirements during the period March 1, 2018 and September 30, 2018;

- d. Attendance records and other appropriate documentation to show that the school adhered to published policies and procedures with regard to each student listed above; and
  - e. An update on the school’s implementation of the new information management system.
5. MCU has yet to demonstrate that the school has adequate management and administrative capacity with the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards (*Section I (A)(1)(a), Substantive Standards, Standards of Accreditation*). The Commission is concerned about the school’s inability to demonstrate compliance with accrediting standards after being afforded three opportunities to provide additional documentation, particularly in context of ongoing questions regarding the school’s financial structure. The school must take immediate and focused action in response to this Probation Order to demonstrate capability to resolve the unanswered questions with regard to the school’s compliance with accrediting standards. The Commission took note of the observation in the TSR that “the school’s managers are still learning the requirements of the *Standards of Accreditation*” and is interested in the professional development activities that the school’s managers have since undertaken to support their understanding of ACCSC’s *Standards of Accreditation*. In order to garner additional training and specific assistance, the Commission directs at least one member of the school’s management team to attend the October 2018 Accreditation Workshop.

Based on the foregoing, the Commission directs the school to submit the following:<sup>3</sup>

- a. A list of the school’s management and administrative staff;
- b. A description of the professional development activities that each staff member has undertaken in 2017 and 2018 along with documentation; and
- c. Documentation of attendance at an October 2018 Accreditation Workshop.

**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

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<sup>3</sup> The Commission will take the totality of the school’s response to this Probation Order into consideration when evaluating the ability of the school’s managers to lead and manage a postsecondary institution in compliance with accrediting standards.

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 12 months, the maximum timeframe allowed for MCU to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen months. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on **March 5, 2020**. 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.

**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.

MCU 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>4</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.

MCU 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

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<sup>4</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).

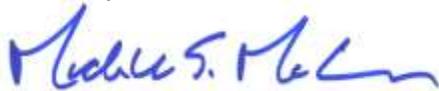
the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

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 December 21, 2018**. If a response, the required fee,<sup>5</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before December 21, 2018**, 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,



Michale S. McComis, Ed.D.  
Executive Director

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<sup>5</sup> ACCSC assesses a \$1,000 processing fee to a school placed on Probation.