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2. RVSM did not demonstrate successful student achievement by reporting acceptable rates of student graduation and employment in the career field for which the school provided education that are supported by verifiable documentation (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the July 3, 2018 deferral letter, the school reported the following rates of student achievement using an August 2018 Report Date as compared to the previously reported February 2018 rates:

Program	Program Length (Mos.)	Graduation Rate 2/18 Report Date	Graduation Rate 8/18 Report Date	ACCSC Benchmark Graduation Rate	Employment Rate 2/18 Report Date	Employment Rate 8/18 Report Date	ACCSC Benchmark Employment Rate
Massage Therapy	9	33%	57%	60%	0%	50%	70%
Massage Therapy	6	85%	80%	73%	64%	50%	

The Commission found that RVSM reported the graduation and employment rates highlighted above that fall below ACCSC’s student achievement benchmark rates.¹ In response to the July 3, 2018 deferral letter, RVSM indicated that the licensing process includes an additional 3-4 months for graduates to receive a license due to changes in the licensing process, therefore adding to the school’s challenges of maintaining contact with the student after graduation. RVSM further explained that the school “prepares students to take the licensing exam when they graduate. We do not have any say on when they take the exam after they graduate. This is fully the student’s decision on when to take the test.” This approach did not give the Commission confidence that the school is focusing on student success. The Commission expects schools to be proactive in guiding students to finding success after graduation.

Although RVSM provided some strategies to improve reported rates of student achievement that include assisting graduates with the licensure process to alleviate issues and delays with the process and contacts made with employers that are hiring, the response lacks detailed initiatives and action plans to address the low rates.

RVSM also provided copies of the September 11, 2018 Program Advisory Committee (“PAC”) meeting minutes, as directed. The Commission noted that the PAC discussed student achievement rates and commented specifically on potential employers. The PAC also discussed some of the reasons why graduates are unable to complete the licensure exam including hesitation to take the exam and the enrollment of students that may not be capable of passing the exam. Specifically, in the PAC minutes the Director of Education suggested a potential admissions test to “help deter people from starting if they don’t think they can handle it.” The Director of Education went on to talk about a student at a reading level of 8th grade and stated “[s]he has taken the final 4 times and has come close to passing,

¹ Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VII - Student Achievement Rates.

but can't. If we would have given her an entrance exam, she never would be started.” A PAC member mentioned that the school should also consider adding an admissions process that assesses the applicant's interest and dedication. The PAC also discussed that another main reason students do not take the exam is because students cannot afford the cost of the exam. The PAC suggested an additional component to the school's scholarship program to provide students who maintain a good grade point average with an additional \$200-\$300 to cover the cost of the licensure exam. The Commission acknowledged that the school is considering ways to address the root cause of the issues but the response does not include any follow-up actions plans specifically addressing the initiatives the school is taking to assess students' prior to admissions and to implement the scholarship program that would assist with covering the cost of the exam.

Overall, the Commission found that RVSM has persistently reported low student achievement rates; failed to conduct an effective assessment identifying the root cause of student achievement issues; developed an effective plan of action to improve student success; or devoted sufficient resources to the implementation of that plan.

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

- a. An updated description of the strategies being implemented to improve the reported rates of student achievement in the school's 9-month and 6-month Massage Therapy programs and an analysis and assessment of the effectiveness of the school's efforts;
- b. An updated description of the school's plan and an assessment of that plan and initiatives the school took to assist students and graduates with the Massage Therapy licensure examination process. This should include the results of an admissions study and any changes made to the admissions requirements and process based on the results;
- c. A Graduation and Employment Chart for the 9-month and 6-month Massage Therapy programs using an **December 2018** Report Date;
- d. Supporting summary information for the 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 field² (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 ³ (i.e., graduate or employer)

² See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

³ Appendix VII (4)(a) Guidelines for Employment Classification requires the school to verify the employment classification.

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

and

- e. 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.⁴ 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.

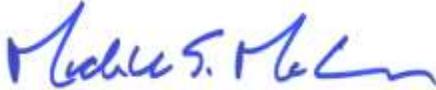
⁴ ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission 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.

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 March 14, 2019**. If a response, the required fee,⁵ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before March 14, 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,



Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]
[REDACTED]

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