

August 23, 2018

**ELECTRONIC DELIVERY**

[REDACTED]  
School Director  
American College of Hairstyling  
603 East Sixth Street  
Des Moines, Iowa 50309

*School #M000656*  
*Continued Warning*

Dear [REDACTED]

At the November 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous action to place American College of Hairstyling (“ACH”) located in Des Moines, Iowa on Warning. Upon review of the September 14, 2017 letter and the school’s response, the Commission voted to continue ACH on Warning for financial concerns. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance with accrediting standards are set forth below.

At the August 2018 meeting, the Commission considered the following applications and reports submitted by American College of Hairstyling (“ACH”) located in Des Moines, Iowa:

- Application for Renewal of Accreditation
- Program Advisory Committee Report
- Learning Resource System Report

Upon review of the April 5, 2018 Team Summary Report (“TSR”), the school’s response to that report, and the Commission’s previous decision to place ACH on Warning for financial soundness, the Commission voted to continue ACH on **Warning** with a subsequent review scheduled for ACCSC’s November 2018 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance with accrediting standards are set forth below.<sup>1</sup>

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

The history of the Commission’s review and action regarding reports and responses from February 2014 through August 2017 is found in Appendix A.

### **November 2017 Review and Action:**

The Commission determined that ACH has yet to fully demonstrate that the financial structure of the school 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*) and satisfactorily meets the Departments regulations (*Section I(D)(3), Rules of Process and Procedure, Standards of Accreditation*).

[REDACTED]  
[REDACTED]  
[REDACTED]

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<sup>1</sup> The accreditation process provides an opportunity for an institution to demonstrate its commitment to continuous improvement. Accordingly, the Commission’s final decision letter on this matter will include an ACCSC Institutional Enhancement Enclosure which lists suggestions deserving the school’s immediate attention and action.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

Based on the foregoing, the Commission directs ACH to submit the following:<sup>2</sup>

- a. Internally prepared financial statements for nine-months to cover the period of January 1, 2018 through September 30, 2018, to include a balance sheet and profit and loss statement, prepared and submitted in accordance with requirements set forth in ACCSC’s [Instructions for the Preparation and Submission of Financial Statements and Related Information](#);
- b. An updated MD&A Management Discussion and Analysis narrative examining and explaining ACH’s current financial condition as follows:
  - i. A discussion that address school’s financial performance goals and results,
  - ii. A financial improvement plan to return to profitability,
  - iii. 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;
- c. ACH’s full fiscal-year 2018 budget with a budget-to-actual analysis for the nine-month period of January 1, 2018 to September 30, 2018;
- d. An update as to ACH’s status with the Department regarding its HCM2 status as well as whether the school is current with all requirements established by the Department;
- e. All correspondence exchanged with the Department regarding the cash deposit; and

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<sup>2</sup> The Commission will also review the December 31, 2017 fiscal year end financial statements received in accordance with ACCSC’s normal requirements.

- f. Any other information or documentation that ACH believes will assist the Commission in its review of the school's financial position.

### **August 2018 Review and Action**

1. ACH must demonstrate that the school has adequate management and administrative capacity in place that includes supervision by an individual or team with the appropriate combination of education, experience, and demonstrated 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 noted that the on-site evaluation team found many of the same concerns identified during the school's last renewal of accreditation. ACH's response to the current TSR continues to lack documentation and/or evidence of the school's compliance with a significant number of areas. While the Commission recognizes the longevity of the management team and management's commitment to "adherence to the standards" as stated in the response to the TSR, given the significant number of areas for which the school did not provide evidence of compliance, the Commission questions the capacity of management to operate the school in compliance with accrediting standards.

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

- a. A description of the current oversight mechanisms used by the school to ensure members of the management team are qualified to effectively lead an accredited institution in compliance with accrediting standards;
  - b. A description of the full management and administrative team, each individual's duties, and a current organization chart;
  - c. Copies of the professional development plan for each person identified in (b.) above;
  - d. A description of how each professional development activity aligns with the manager's role at the school; and
  - e. Documentation of any professional development completed since the on-site evaluation.
2. ACH must demonstrate that the school has appropriate administrative and operational policies and procedures to which the school adheres and reviews and updates as needed (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH provided a copy of the school's operational policies and procedures. The school indicated that the last staff briefing on the procedures was 2016 and that for the two new employees since that time, the school "...will test them over the material in June 2018." In addition, the Commission noted that the operating policies provided in the response appeared to be last updated in March 2017. The school did not provide details as to when the procedures are routinely reviewed and updated and how staff are trained on any additional policies or modifications to existing policies.

As such, the Commission directs ACH to submit the following:

- a. A description regarding the on-going review of all operational policies, including the schedule for upcoming reviews and documentation of any review and changes made since the on-site evaluation;
- b. The timeline for training all employees on revised operational policies; and
- c. Documentation that the new employees have completed the training on the operational policies.

3. ACH must demonstrate and document that its faculty and educational administrators engage in ongoing professional development activities that are appropriate to the size and scope of the school's educational programs and include elements such as continuing education in the subject area taught; teaching skill development; instructional methodology development; membership in trade and professional organizations as appropriate (*Section III (A)(2), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school did not maintain documentation to show regular assessment and professional development for faculty. In the response, ACH stated that the school has now "pulled together, in one place, data we have had in multiple locations." The operational policies and procedures provided in the response state that "[i]nstructors are required to obtain not less than 12 clock hours of continuing education each year per instructor;" however, the faculty file provided in the response did not contain any documentation of professional development. While the Commission noted that the school has created a policy and procedure for ongoing assessment and professional development activities, ACH did not provide documentation of implementation of the written plan.

Therefore, the Commission directs ACH to submit the following:

- a. A listing of all faculty and educational administrators;
  - b. The faculty development plan for each faculty member;
  - c. Certificates of Completion or other evidence of completion for all completed faculty development and trainings; and
  - d. Any other information the school deems necessary to report on its continued efforts to demonstrate its faculty and educational administrators engage in ongoing faculty assessment and professional development activities.
4. ACH must demonstrate and document that faculty members have received training in instructional methods and teaching skills or be experienced teachers (*Section III (B)(4), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH described the State of Iowa's requirements for licensing a new instructor that includes working as an assistant instructor for approximately six months. After six months, the instructor takes the examination given by the Iowa Board of Barbering to obtain a full instructor's license. In addition, the school stated that that licensed instructors are required to complete seven hours of continuing education every two years and "[t]he school retains a classroom teacher with a master's degree to give con-ed [*sic*] instruction in teaching methods to the school's staff." Although the state requires new instructors to complete on-the-job training prior to taking the instructor licensing exam, it is not clear if the school provided any specific training to new instructors prior allowing the instructor to work as an assistant instructor. In addition, the school did not provide any documentation of the training provided to all faculty specific to instruction in teaching methods.

Therefore, the Commission directs ACH to provide the following:

- a. An explanation as to the school's training plan for faculty hired as assistant instructors prior to the instructors completing the instructor licensing examination;
- b. A list of all faculty hired since the on-site evaluation;
- c. Documentation that the new faculty listed in (a.) received training in instructional methods prior to entering the classroom;

- d. Documentation for all faculty who have participated in the continuing education training in instructional methods, including the dates of the training.
5. The school must demonstrate that the LRS is managed by qualified school personnel with sufficient experience to provide oversight and supervision (*Section II (A)(7)(c), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH stated that the LRS manager had to leave due to illness and the school named a new manager, [REDACTED]. The school stated that [REDACTED] is a licensed barber instructor; however, the school did not provide any documentation regarding [REDACTED] qualifications and training to oversee the LRS. Therefore, the Commission directs ACH to provide documentation of [REDACTED] qualifications and training to oversee the LRS.
6. ACH must demonstrate that the school demonstrates sufficient support and budgetary allocations for the LRS (*Section II (A)(7)(e), Substantive Standards, Standards of Accreditation*). The on-site evaluation team noted that the budget provided for the LRS includes consumables such as supplies to support haircare services for the public. ACH contends that the budget for consumables used for services provided to the public "...is central to our instruction system." The Commission recognized that the students benefit from the experiences in the school's public shop; however, that experience is more in alignment with practical training/laboratory training. ACCSC's standards use the term "learning resource system" to refer to the array of materials that a school makes available to students, which may include texts; electronic resources; learning resource laboratories and centers; library consortia and interlibrary loan agreements; computers; internet access; research databases; and other similar resources and equipment necessary to adequately serve the student body. In the response, ACH did provide a short summary of supplies purchased for the LRS in 2017 such as a studio-quality video camera, 35 mm camera, and a computer projector to be used to produce in-house training films. In addition, the school identified that the school purchased \$1223 and \$993 of LRS supplies in 2016 and 2017 respectively; however, other than the camera equipment, the school did not provide details as to what type of supplies were purchased. The school failed to provide sufficient evidence that the budget routinely includes budgetary allocations for the LRS or how the LRS allocations are distributed.

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

- a. The school's current fiscal year budget with a budget-to-actual line to show expenditures-to-date for the on-going development of the LRS and
  - b. An explanation as to how the school determined that the budgetary allocations are sufficient to support the LRS.
7. ACH must demonstrate compliance with Program Advisory Committee ("PAC") standards (*Section II (A)(6), Substantive Standards, Standards of Accreditation*) as follows:
    - ACH must demonstrate that in all instances, PAC meetings include at least three members in attendance (*Section II (A)(6)(a), Substantive Standards, Standards of Accreditation*);
    - ACH must demonstrate that written minutes of each meeting include a description of all members in attendance (I.E., Titles and affiliations)(*Section II (A)(6)(c), Substantive Standards, Standards of Accreditation*); and
    - ACH must demonstrate that PAC members review and comment, at least annually on state licensing examination outcomes of each program (*Section II (A)(6)(d)(ii), Substantive Standards, Standards of Accreditation*).

In response to the on-site evaluation team's finding that only two members were in attendance at one of the meetings in 2015, the school stated that in February 2014, a PAC member was unable to attend due to illness and the school added a fourth member to the PAC committee to "allow for the unexpected absence of one of its members." In addition, the school provided copies of PAC minutes from 2014, 2015, 2016, and 2017. Review of the minutes included in the response show only one set of minutes for 2015 and 2017. In regards to the number of members in attendance, the one set of minutes provided for 2015 only had two PAC members in attendance. In addition, as only one set of minutes was provided for 2015 and 2017, ACH did not demonstrate that the school consistently holds two PAC meetings per year and, as noted by the team, the school has not always had sufficient PAC members in attendance.

With regards to the titles and affiliations of the PAC members in attendance, the school stated "...the attendees from meeting to meeting do not usually change. The school will list each PAC member and their titles and affiliations going forward." While the Commission recognizes the school's intent to comply with PAC standards in this regard, ACH did not provide evidence that the school has implemented the process.

ACH stated that the school reviews student achievement "...at our fall/winter meeting..." and that "[s]tudents who have taken the State Examination have all passed on their first try in the period since the school's last accreditation (February 2014)." However, the school only provided one set of PAC minutes for 2015 and 2017, neither of which include review and comment on student achievement and licensure outcomes. Thus, the Commission found that the minutes do not provide sufficient evidence that the PAC consistently reviews and comments student achievement, including the licensure pass rate at least annually.

Based on the foregoing the Commission determined that further monitoring is warranted as a means to afford the school with an additional opportunity to demonstrate compliance with ACCSC's PAC standards. As such, the Commission directs ACH to submit the following:

- a. Written and detailed minutes for all PAC meetings held in 2018 that include:
    - i. The date, time, and location of the meeting;
    - ii. A description of all members in attendance (i.e., titles and affiliations) notating those that represent the employment community;
    - iii. A comprehensive and clear description of the review of and commentary made by the school representatives and the Program Advisory Committee members in compliance with *Section II (A)(6)(d)(i-iii), Substantive Standards, Standards of Accreditation*, including student achievement and licensure rates; and
    - iv. Evidence to show that the school has given consideration to the recommendations of the Program Advisory Committees; and
  - b. 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 PAC requirements.
8. ACH must demonstrate that the school is attentive to its students' education and other needs (*Section VI (A)(1), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH stated that at the time of the on-site evaluation, the school had recently imposed additional rules that upset the students and that "some but not all of the dissatisfaction was sown by a staff member who is no longer with the school..." who did not support the new rules. ACH conducted a new survey and reported the

results. The Commission noted that the student survey conducted on May 15, 2018 still indicate student dissatisfaction in the following areas: Financial Aid (25%); Student Services (25%); LRS (27%); Facility (49%); and Training Equipment (35%). Although the school indicated that it also surveyed former students and provided feedback regarding responses about the staff, salary, and receipt of enrollment agreement and catalog, the school did not provide any information as to the number of graduates responding and did not provide graduate student feedback on the majority of areas where the current students expressed dissatisfaction. ACH did not provide any strategies to improve student satisfaction.

Accordingly, the Commission directs ACH to conduct a survey of at least 50% of the student enrolled population using a survey substantially similar to the ACCSC student survey for all areas identified above and to submit the following:

- a. A description of the student survey process and a copy of the survey instrument used;
  - b. A detailed analysis of the survey results with a particular focus on any result that show less than 80% satisfaction;
  - c. An update of the effectiveness of the school's plan to address areas of student dissatisfaction;
  - d. A detailed description of any additional plans to address any additional areas of student dissatisfaction, if applicable, and any other information to support the efforts made to enhance a student's experience at the school; and
  - e. 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.
9. ACH must demonstrate that the school maintains comprehensive documentation of student advising sessions (*Section VI (A)(5), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH agreed with the team and stated that the school initiated the use of "Microsoft Outlook as our preferred method of document advising sessions." However, the school failed to provide copies of the school's policies and procedures for documenting student advising sessions nor did the school demonstrate implementation of the use of Microsoft Outlook to document student advising.

Therefore, the Commission directs ACH to submit the following:

- a. A copy of the school's process and procedure for documenting student advising sessions;
  - b. A list of all students that receiving advising from July 1, 2018 to September 30, 2018, and
  - c. Copies of the school's documentation of advising for each student.
10. ACH must demonstrate that the school maintains a student services program that encompasses relevant coping skills (e.g., life, career development, budget, and personal financial planning skills) and information concerning housing, transportation, and child care) (*Section VI (A)(3), Substantive Standards, Standards of Accreditation*). In response to the TSR, the school provided a list of resources available for the students. The Commission noted that the information includes where students can find counseling services, healthcare, housing help, etc.; however, the school did not provide information as to when and how students obtain the list of community resources. In addition, the school did not identify anyone on staff who is responsible and available to assist students if they have needs outside the classroom. The Commission also noted that 38% of the respondents to the team-administered student survey and 25% of the respondents to the school-administered student survey expressed dissatisfaction

with student services. Thus, the Commission found that the school does not appear to have a student services program. Rather, ACH appears to merely have a list of available services. There is no evidence as to how ACH monitors and addresses the students’ needs for services on an ongoing basis, an assessment of the appropriateness of the available services, student awareness of the services, or the effectiveness of the services on student success.

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

- a. A narrative description along with policies and procedures for administering, monitoring, and addresses the students’ needs for services on an ongoing basis;
- b. A copy of the job description of the staff person assigned to oversee student services, including documentation of the qualifications of the individual tasked with managing and overseeing student services; and
- c. A description of the school’s most recent efforts to monitor student needs and documentation of the results of that assessment, as well as a description and documentation of any action taken to address the specific findings of that student needs assessment.

11. ACH must demonstrate that the school maintains documentation covering the last five years that demonstrates that admissions requirements have been met or that explains the basis for any denial of admission (*Section V (A)(5), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH stated “[w]e have begun keeping files on all applicants whether accepted for enrollment.” No additional information was provided. The Commission found that the school failed to provide evidence that the school has an appropriate process and procedure for maintaining admissions documentation for students that are denied admissions. Specifically, ACH did not provide any documentation that the school has made the changes referenced in the response.

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

- a. A copy of the school’s process and procedures for maintaining admissions documentation, specifically including the maintenance of student files with regards to denial of admissions;
- b. A list of students denied since the on-site evaluation; and
- c. A copy of the information maintained in the student file for each student denied admissions.

12. ACH must demonstrate that the school’s policy with regards to leave of absence complies with accrediting standards (*Section VII (A)(3)(c), Substantive Standards, Standards of Accreditation*). In the response to the TSR, ACH stated that the school revised the leave of absence policy and developed a request form for a leave of absence. The Commission acknowledges the school’s efforts in this regard; however, ACH did not provide evidence of implementation of the process for granting a leave of absence or the use of the “Leave of Absence Request” form.

Therefore, the Commission directs ACH to submit the following:

- a. A list of students who have been granted a leave of absence since the on-site evaluation as follows:

Student Identification Number	Date of Written LOA Request	Start Date of LOA Period	Date of LOA Approval

- b. For each student identified in (a.), a copy of the completed Leave of Absence Request form; and

- c. An explanation for any instance where the start date of the leave of absence period occurs before the date of the written leave of absence request/approval.

13. ACH must demonstrate that the school completes the Graduation and Employment Charts in accordance with the prescribed requirements and instructions that accompany the chart (*Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation*). In response to the on-site evaluation team's finding that the school reported one student as a graduate who did not graduate as the student owed a debt to the school, the school stated the following:

*[f]or the purpose of completing the annual report he is certainly not a drop. Since he completed the hours of the course, passed all final tests, is gainfully employed and has a questionable license status only because of the school's own rule that he pay his account off, we considered him a graduate for the purposes of preparing the G & E chart.*

*Section VII (A)(3)(h), Substantive Standards, Standards of Accreditation* states that successful program completion is based upon satisfactory achievement of the knowledge, skills, and competencies required by the program objectives and **is confirmed by an appropriate credential** (e.g., certificate, diploma, degree). In addition, *Section VII (B) (1)(b), Substantive Standards, Standards of Accreditation* states the school must support its student achievement rates through **student transcripts**, the school's verifiable records and documentation of initial employment of its graduates, and exam pass rate data obtained from the requiring entity [**emphasis added**]. ACH stated its policy is that a credential will not be awarded if a student does not pay all costs or make arrangements to do so before the student graduates. Since the school reported the student with an outstanding balance as a graduate and as employed in field without the requisite license, it appears that the school misrepresented the information provided on the Graduation & Employment Chart. The Commission is concerned that while the on-site evaluation team only identified one student reported as placed without graduating, there may be additional students reported as graduated, but did not actually receive a credential due to outstanding debt owed to the school. As such, the Commission is interested in obtaining additional information regarding the reporting practices of ACH.

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

- a. A copy of the school's policies and procedures for determining that a student has met all school criteria to receive a credential;
- b. A revised policy and procedure for reporting non-graduates, including those who have outstanding balances, on the ACCSC Graduation & Employment Charts;
- c. A copy of the Graduation & Employment Chart for all programs as submitted in the 2018 Annual Report;
- d. For all students reported as graduates in the 2018 Annual Report, documentation that each graduate has met **all** school requirements to be considered a graduate, including the final transcript and a copy of the credential issued to the student;
- e. For all students reported as employed in field in the 2018 Annual Report, documentation that each student has successfully achieved licensure; and
- f. An explanation for any student who is reported as employed in field in (e.) above that has not yet passed the licensure examination.

14. ACH must demonstrate that the school discloses, minimally, the graduation and employment rates for each program as last reported to the Commission and that the disclosure includes the program population base and time frame upon which the rate was based (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). In response to the TSR, ACH revised the disclosure reported in school's catalog; however, the disclosure does not conform with ACCSC requirements. The information provided to students is summative information for all programs since 2010. The rates presented are not for each program and are not the rates last reported to the Commission. Therefore, the Commission directs ACH to demonstrate that the school has revised the disclosures provided to students to include each program; the population base and time frame for the report; and the graduation and employment rates last reported to the Commission.
  
15. ACH must demonstrate that the school has maintained the capacity to offer the Master Barbering/Hairstyling (Diploma) and the Refresher/Licensed Barbers (Diploma) programs (*Section IV (E)(6)(f), Rules of Process and Procedure, Standards of Accreditation*). The TSR states that the aforementioned programs were not operational at the time of the on-site evaluation. In response, ACH stated that the school plans to continue offering the programs. The school stated that the Master Barbering/Hairstyling programs provides students training in the "Basic program and then transition into the job market while still enrolled at the school." The school considers the in-shop experience as an externship with the intent that the student will transition to employment at the shop. ACH stated that the school has the first enrollment several years starting the externship in July 2018. With regards to the Refresher/Licensed Barbers program, the school states the program is designed to "retrain individuals who once were in a shop, dropped out of barbering and now want to return." While the Commission acknowledges the school's explanation as to the purpose of each program, the school did not provide any specific evidence to demonstrate the capacity to offer the programs, including faculty support, designated oversight coordinator for the externship portion of the Master Barbering/Hairstyling program, or any proposed start date for the Refresher/Licensed Barbers program.

Based on the foregoing, ACH must provide a comprehensive explanation and show how the school is capable of offering the aforementioned programs and as such the Commission directs ACH to submit the following:

- a. An explanation as to how the school has maintained the capacity to offer the aforementioned programs including the equipment, facilities, faculty, curriculum, and learning resource system;
- b. The school's history of enrolling students in these programs throughout current cycle of accreditation highlighting the last enrollment date in each;
- c. A list of all faculty assigned to teach in these programs or the school's plan to hire faculty to teach in these programs;
- d. Minutes from PAC meetings held that demonstrate the review and commentary of items required by *Section II (A)(6)(d)(i), Substantive Standards, Standards of Accreditation*; and
- e. 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.

**Warning Restrictions:**

Pursuant to *Section VII (K)(9), Rules of Process and Procedure, Standards of Accreditation*, 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 under a Warning.

### **Notification to Students**

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(8) Rules of Process and Procedure, Standards of Accreditation*).

### **Teach-Out Plan**

Due to the Commission's concerns regarding ACH's financial soundness the Commission requires the school to submit an [ACCSC Institutional Teach-Out Plan Approval Form](#) along with an [ACCSC Teach-Out Agreement Approval Form](#) and teach-out agreement with another accredited school for any programs/student(s) that the school cannot or would not intend to complete the training should closure of the school occur. The school must demonstrate that it has a plan that provides for the equitable treatment of students and that ensures obligations to students are timely met.

### **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.

ACH 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>3</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.

ACH 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 Electronic Submission 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.

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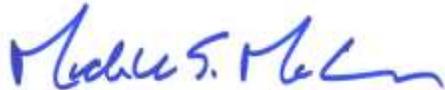
<sup>3</sup> ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response 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 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 October 5, 2018**. If a response, the required fee,<sup>4</sup> and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before October 5, 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

c: T. L. Millis  
tmillis@americancollegeofhair.com

Encl.: Appendix A - History of the Commission's Review

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<sup>4</sup> ACCSC assesses a \$500 processing fee to a school placed on Warning.

## **Appendix A**

### **History of the Commission's Review**

#### **February 2014 Review**

At the February 2014 meeting, the Commission considered its previous decision to place ACH on Warning in view of the school's license suspension by the Iowa Board of Barbering ("the Board"). Upon review of the September 4, 2013 Commission letter and the school's response, the Commission voted to vacate the Warning. Additionally, the Commission voted to place ACH on Financial Reporting in order to monitor ACH's financial position [REDACTED]

Subsequent to the February 2014 meeting, the Commission was copied on the February 28, 2014 notice from the U.S. Department of Education ("the Department") disclosing that the Department had transferred ACH from the Advance method of payment to the Heightened Cash Monitoring Level 2 ("HCM2") method of payment effective February 28, 2014. The Department took this action because of the school's overdue compliance audit and unresponsiveness of returning the signed Program Participation Agreement.

#### **August 2014 Review**

At the August 2014 meeting, the Commission considered ACH's Application for Renewal of Accreditation. Upon review of the record on file, the Commission noted several items pending review. These items included the school's response to the March 12, 2014 ACCSC Financial Reporting Enclosure and the response to the July 8, 2014 ACCSC letter regarding the school's HCM2 status with the Department. As a result, the Commission voted to table the review of the Application for Renewal of Accreditation until November 2014 in order to pair the application with other outstanding matters for the school.

#### **November 2014 Review**

At the November 2014 meeting, the Commission considered ACH's Application for Renewal of Accreditation; Heightened Cash Monitoring 2 Status; and Financial Report. Upon review of the May 27, 2014 Team Summary Report ("TSR"); the March 12, 2014 ACCSC Financial Reporting Enclosure; the July 8, 2014 ACCSC letter regarding the school's HCM2 status; and the school's responses, the Commission voted to place ACH on Probation. ACH was unable to demonstrate compliance with accrediting standards in the following areas: financial structure and soundness; state requirements; student loan repayment; management and administrative capacity; management qualifications; graduate employment classifications; faculty prior work experience; program advisory committees; institutional assessment and improvement activities; refund policy; leave of absence policy; learning resource system; advertising and promotional materials.

#### **May 2015 Review**

At the May 2015 meeting, the Commission considered its previous decision to place ACH on Probation. Upon review of the February 3, 2015 Probation Order and the school's response, the Commission voted to again continue ACH on Probation. The Commission found that ACH must demonstrate compliance with accrediting standards in the following areas: financial structure and soundness; compliance with state requirements; student loan repayment; program advisory committee; learning resource system budgetary allocations.



█ [REDACTED]

█ [REDACTED]

In addition, at the August 2017 meeting, the Commission considered the Program Advisory Committee (“PAC”) Report, Learning Resource Systems (“LRS”) report, and Outcomes Report submitted by ACH. The Commission voted to accept the Outcomes Report and remove ACH from Outcomes Reporting. In addition, the Commission voted to continue the school on PAC Reporting and LRS Reporting and refer these matters for review in conjunction with the school’s re-evaluation for Renewal of Accreditation and on-site evaluation scheduled for October 24-25, 2017.