

September 20, 2019

ELECTRONIC DELIVERY

██████████
Campus Director
Elegance International
6767 Sunset Boulevard
Hollywood, California 90028

██████████
School #M000390
Withdrawal of Accreditation

Dear ██████████

At its August 2019 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue Elegance International located in Hollywood, California on Continued Probation with Show Cause in accordance with *Section VII (L)(1), Rules of Process and Procedure, Standards of Accreditation*. Upon review of the school’s response to the Commission’s May 29, 2019 Continued Probation Order, the Commission found that Elegance International failed to 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*);
- The school only classifies graduates as employed in field who are employed for a reasonable period of time in a position that can be considered sustainable (*Section VII (B)(1)(b), Substantive Standards, Appendix VII, Standards of Accreditation*); and
- The school maintains successful student achievement through acceptable rates of graduate employment in the career field for which the school provided education and supports these rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*).

Therefore, the Commission voted to withdraw Elegance International’s accreditation and to remove the school from the list of ACCSC-accredited institutions. The history of the Commission’s review and bases for the Commission’s decision to withdraw Elegance International’s accreditation are set forth below.

History of the Commission’s Review

November 2017 Review

At its November 2017 meeting, the Commission considered the Application for Renewal of Accreditation submitted by Elegance International. Upon review of the August 1, 2017 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to place Elegance International on Warning with a subsequent review scheduled for ACCSC’s August 2018 meeting. The grounds for the Warning¹ included compliance concerns in the following areas: Employment Classification, Student Achievement, Enrollment Agreement, Admissions, Externships, Recruitment, Scholarships, Advertising, and Employment Verification.

August 2018 Review

At the August 2018 meeting, the Commission reviewed the February 12, 2018 Warning Order and the school’s response and based upon this examination the Commission voted to place Elegance International

¹ See the February 12, 2018 Warning letter.

on Probation² with a subsequent review scheduled for ACCSC’s November 2018 meeting. The grounds for the Probation included compliance issues with accreditation standards in the following areas: Financial Viability, Student Achievement, Employment Classifications, Employment Verification, Enrollment Agreements, Externships, and Admissions.

November 2018 Review

In November 2018, the Commission evaluated the school’s response to the August 21, 2018 Probation Order and found continuing compliance issues. As such, the Commission voted to continue Elegance International on Probation³ until ACCSC’s May 2019. The grounds for the Continued Probation included: Financial Viability, Student Achievement, Employment Classification, Employment Verification, and Employment Documentation.

May 2019 Review

At the May 2019 meeting, the Commission carefully reviewed Elegance International’s response to the November 28, 2018 Continued Probation Order. Predicated on this review, the Commission voted to continue Elegance International on Probation with Show Cause as to why the school’s accreditation should not be withdrawn.⁴ The Commission’s decision specifically directed the school’s attention to compliance issues in the following areas as required by the accreditation standards: Financial Viability, Student Achievement, Employment Classification, Employment Verification, and Employment Documentation. The Commission expressed significant concerns regarding the school’s compliance with these accrediting standards, noting that despite multiple opportunities to demonstrate compliance, Elegance International had yet to provide sufficient documentation in these areas. As such, the Commission directed the school to show cause as to why the school’s accreditation should not be withdrawn (*Section VII (L)(1), Rules of Process and Procedure, Standards of Accreditation*). Additionally, as stated in the May 29, 2019 Continued Probation letter, the Commission gave notice to Elegance International that “[f]ailure 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.”

August 2019 Review and Action

At the August 2019 meeting, the Commission considered Elegance International’s probationary status and the information the school had provided to address the Commission’s compliance findings. Upon review of the May 29, 2019 Continued Probation Order and the school’s response thereto, the Commission found that Elegance International again failed to establish compliance in the following areas:

1. Elegance International failed to 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*). [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

² See the August 21, 2018 Probation letter.
³ See the November 28, 2018 Continued Probation letter.
⁴ See the May 29, 2019 Continued Probation letter.

2. Elegance International did not demonstrate that the school’s graduates can be classified as employed in field for a reasonable period of time in a position that can be considered sustainable (*Section VII (B)(1)(b), Substantive Standards, Appendix VII, Standards of Accreditation*). Specifically, Elegance International failed to prove that for the Artistry Make-up program, an acceptable percentage of graduates garner employment in the field that can be considered sustainable relative to the period of time employed and income earned.⁵

Based on the school’s response to the May 29, 2019 letter, the Commission noted that Elegance International updated the school’s policy and procedures for employment classifications based on the school’s definition of “sustainable” employment. Elegance International stated:

In the institution’s opinion, 5 compensated event/project based jobs are considered sustainable employment because when paired with the 120 externship hours component requirements, it adds to the graduate’s already existing portfolio and resume thus providing them with more on-set experience and allowing them to book additional work. While the total income of these 5 event/project based jobs appears to be minimal, when compared to traditional employment income, it should be understood that this is just a portion of what graduates will be employed in and earning annually.

The Commission noted the following examples from the project based employment Verification Forms provided by the school:

Graduate Name	Project/Event Date	Type of Service Provided	Total Income Earned
██████████	07/12/2017	Drag Make-up \$200	\$650
	09/17/2018	Drag Make-up \$150	
	08/30/2018	Airbrush Make-up\$300	
██████████	08/16/2018	Bridal Make-up \$100	\$340
	01/09/2018	Bridal Looks \$90	
	09/14/2017	Groom’s Make-up \$150	
██████████	07/14/2017	Beauty Make-up for Date \$150	\$450
	12/12/2017	Beauty for Wedding \$100	
	11/08/2017	Full Beauty Make-up for Photoshoot \$200	
██████████	12/19/2017	Prom: Foundation Match, Beauty Makeup \$80	\$280
	05/30/2018	Prom makeup with Photoshoot \$80	
	08/14/2017	Wedding Makeup \$120	

* Program Tuition = \$18,500

The Commission noted that the total income generated through three event/project jobs from the examples provided above is minimal and even if the income is just a portion of what graduates will earn annually, Elegance International did not demonstrate how the graduates would earn additional

⁵ See also Ground #3 below.

income to exceed what the school considers “minimal.” In addition and with consideration of Elegance International’s new five event/project job policy, even with an additional two event/project jobs for the aforementioned graduates, the generated income would appear to remain minimal and would not support a classification of sustainable employment in the Artistry Make-up field. Furthermore, regarding Elegance International’s justification that five event/projects paired with the 120 externship hours component requirements allows the graduate to book additional work, the Commission found that Elegance International failed to demonstrate that the graduates in fact book additional event/projects on a regular and continuous basis allowing the graduates to exceed the five event/project jobs.

Furthermore, the Commission noted from Elegance International’s revised Event/Project Based Employment policy:

Event or project workdays can vary from one to ten plus hour workdays because of the nature of the industry. They can range from private client makeups that are completed in less than 2 hours to 15-hour music video workdays. In order for graduates to be considered placed in this category they must have completed 5 paid event/project based jobs within 6 months of their graduation date.

Assuming a graduate gains five-paid event/project based jobs every six months, per the school’s policy, the Commission failed to see how ten event/project jobs in a one-year period can be considered employed in the field for a reasonable period of time, given the school’s stated policy. Per that policy, ten event/project jobs in a twelve-month period could equate to as little as 10 hours and earn the graduate less than \$1,000. The Commission found that less than one event/project per month that ranges from less than two hours to 15 hours does not constitute regular and on-going employment and fails to support the school’s position that the graduate garnered employment that generates sustainable income earned in the field of Artistry Make-up. This is of particular note given the \$18,500 tuition for the program. Accordingly, the Commission found that Elegance International failed to demonstrate that an acceptable percentage of the school’s graduates can be classified as employed in the field for a reasonable period of time in a position that can be considered sustainable.

- Elegance International failed to demonstrate successful student achievement through acceptable rates of graduate employment in the career field for which the school provided education and support these rates through the school’s verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). The Commission considered the history of student achievement rates including student achievement rates using a March 2019 Report Date on the Graduation and Employment Charts:

Program	Length in Months	EI Grad Rate Jan 2018 Report Date	EI Grad Rate July 2018	EI Grad Rate March 2019	ACCSC Benchmark Graduation Rate	EI Employ Rate Jan 2018 Report Date	EI Employ Rate July 2018	EI Employ Rate March 2019	ACCSC Benchmark Employment Rate
Artistry of Makeup	12	65%	65%	55%	55%	44%	70%	19%	70%
Artistry of Makeup	15	67%	65%	47%	47%	44%	72%	16%	

The employment rates reported by Elegance International which are highlighted above fall below ACCSC’s student achievement benchmark rates. Previously and in response to the Commission’s November 28, 2018 letter, Elegance International stated that the employment rates for the 12-month

and 15-month Artistry of Makeup programs are below benchmark because the graduates reported as “Graduate-Unemployed” on the Graduation and Employment Charts have not yet been verified. Furthermore, Elegance International stated that the school had not yet categorized the graduates as employed in the field and would have done so upon receiving the verified employment and employment verification forms (i.e. Zoho forms). Elegance International also stated that there were 90 graduates reported for the 12-month Artistry of Make-up program and that once the school completed the verification items, the school would classify the 90 graduates in the “Graduates-Employed in field” category thus raising the employment rate.

In response to the May 29, 2019 letter and in regard to the below benchmark employment rates for the Artistry of Make-up program, Elegance International again stated that that the overall employment rates are below the Commission’s benchmark because the graduates reported under the “Graduates-Unemployed” category on the Graduate & Employment Chart require the completed employment verification forms (i.e. Zoho forms) before the school can classify the graduates as employed in the field. However, Elegance International again failed to obtain the required employment verification forms to support the in-field placements that the school continues to claim. Elegance International also stated:

The 90 graduates on the 12 month Graduate & Employment Chart, once complete with their additional verification items, will be moved to “Graduates – Employed in Field” increasing the percentage above the Commission’s benchmark.

Additionally, the institution has changed its employment placement policy per the Commission’s guidelines for each previous response submission. As the institution updated the policy, the requirements for each graduated to be considered place changed therefore, prohibiting the institution from converting the “Graduates – Unemployed” mentioned approved to fully placed graduate on this Graduation and Employment Chart.

The Commission found that the school’s assertions do not provide valid reasons as to why Elegance International has continuously been unable to classify the graduates as employed in the field and unable to support the classification of graduates with verifiable documentation of employment. Regardless of the changes to the employment classification policy, Elegance International failed to support the school’s in-field employment classifications by providing complete employment verification forms. In addition, Elegance International had multiple opportunities to provide verified employment documentation to support the school’s expectation to reclassify the 90 graduates as employed in-field. Furthermore, since Elegance International failed to demonstrate sustainable in-field employment for the Artistry of Make-up program, even with the new five event/project job policy, the graduates could not be classified appropriately as employed in the field and therefore the employment rate would not meet benchmark. Accordingly, the Commission found that Elegance International failed to demonstrate successful student achievement through acceptable rates of graduate employment in the career field for which the school provided education and support these rates through the school’s verifiable records and documentation of initial employment of its graduates.

For the foregoing reasons, the Commission has acted to withdraw Elegance International’s accreditation to remove the school from the list of ACCSC-accredited schools.

Appeal and Reapplication Process and Procedure

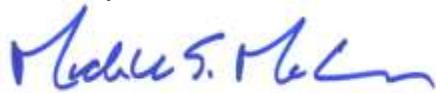
Elegance International may opt to appeal the Commission's decision to withdraw accreditation or may elect to reapply for accreditation. Details regarding the reapplication and appeal procedures are outlined in the *ACCSC Rules of Process and Procedures, Standards of Accreditation*.

- If Elegance International elects to appeal this decision, the school must sign and return the enclosed Letter of Intent to Appeal a Commission Decision, along with the Appeal Expense Fee of \$6,000.00, **on or before September 30, 2019.**
- If Elegance International elects to appeal this decision, the school's Application for Appeal of a Commission Decision and Grounds for Appeal must be submitted **on or before October 21, 2019.**
- If ICC elects not to appeal this decision, the Commission's decision will become effective **September 30, 2019.** The school may submit comments **on or before September 30, 2019** in accordance with the enclosed Public Comment Disclosure Form. Comments submitted by the school will accompany any public disclosure of a final Commission action pursuant to *Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation*.
- In accordance with *Section VII (N)(3) Rules of Process and Procedure, Standards of Accreditation*, the school may reapply no sooner than nine months from the date on which the denial of accreditation becomes effective.

For additional information regarding the Commission's decision, please contact me directly at

[REDACTED]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

Encls: Letter of Intent to Appeal a Commission Decision
ACCSC Standing Appeals Commission Members
Public Comment Disclosure Form