



Accrediting Commission of Career Schools and Colleges

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December 14, 2017

ELECTRONIC DELIVERY & FEDERAL EXPRESS

██████████
Director
Just Four Paws Academy of Pet Styling
1530 W. 26th St., Ste. I
Erie, Pennsylvania 16508

School #M072500
Denial of Accreditation

Dear ██████████:

At the November 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to defer action on the Application for Initial Accreditation submitted by Just Four Paws Academy of Pet Styling (“JFPA”) located in Erie, Pennsylvania. Upon review of the Commission’s June 9, 2017 deferral letter and the school’s response thereto, the Commission found that the school failed to meet its the burden of demonstrating that it is eligible for accreditation by ACCSC and that it is in compliance with the Commission’s accrediting standards (*Section I (E)(2)(b), Rules of Process and Procedure, Standards of Accreditation*). Therefore, the Commission voted to deny accreditation to JFPA (*Section VII (N)(1), Rules of Process and Procedure, Standards of Accreditation*). The history of the Commission’s actions regarding JFPA and the reasons for the Commission’s decision to deny JFPA’s application for initial accreditation are set forth below.

HISTORY OF COMMISSION REVIEW

May 2017 Meeting

At its May 2017 meeting, the Commission reviewed the Application for Initial Accreditation submitted by Just Four Paws Academy of Pet Styling located in Erie, Pennsylvania. Upon review of the February 9, 2017 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to defer final action on JFPA’s application until the November 2017 meeting in order to provide the school with an additional opportunity to demonstrate compliance with accrediting standards in the following areas:

1. The Commission directed JFPA to demonstrate that the school meets the eligibility criteria for ACCSC accreditation by operating as a school providing education and training to students, on a continuous basis (*Section I (E)(2)(b), Rules of Process and Procedures, Standards of Accreditation*).
2. The Commission directed JFPA to 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*).
3. The Commission directed JFPA to demonstrate that members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school (*Section I (A)(1)(3), Substantive Standards, Standards of Accreditation*).
4. The Commission directed JFPA to demonstrate that the institutional assessment and improvement plan (“IAIP”) includes goal setting, benchmarking, and implementation activities (*Section I (B)(2), Substantive Standards, Standards of Accreditation*).
5. The Commission directed JFPA to demonstrate that the program length is aligned with the program objectives (*Section II (A)(3)(c)(iii), Substantive Standards, Standards of Accreditation*).

November 2017 Commission Meeting and Action

At the November 2017 meeting, the Commission considered JFPA's response to the Commission's June 9, 2017 letter and found that the school failed to meet the burden to demonstrate eligibility for accreditation and that it is in compliance with the *Standards of Accreditation (Preamble, Standards of Accreditation)* and as such the Commission voted to deny the school's Application for Initial Accreditation for the following grounds:¹

1. JFPA failed to demonstrate that the school meets the eligibility criteria for ACCSC accreditation by operating as a school providing education and training to students on a continuous basis (*Section I (E)(2)(b), Rules of Process and Procedures, Standards of Accreditation*). The on-site evaluation team noted that there were three gaps in training during which the school did not have any students enrolled. The first gap spanned approximately 3 months from 10/19/14-1/5/15; the second spanned approximately 1.5 months from 11/21/15-1/4/16; and the third was approximately two weeks from 3/30/16-4/14/16.

In response to the TSR, JFPA provided an explanation which only addressed one of the gaps in training identified by the team (i.e., 3/30/16 – 4/14/16) and indicated that the school had revised its calendar in the hopes that it would prevent gaps in the future. Based on what it considered to be an incomplete response, the Commission determined that additional information was necessary before considering whether the school was eligible for a grant of accreditation. In the deferral letter dated June 9, 2017, the Commission specifically notified the school that the purpose of the eligibility criteria at issue is to prove to the Commission that the school has the wherewithal to maintain operations on a continuous basis. The Commission directed the school to submit a narrative response regarding the other two gaps in training identified by the on on-site evaluation team and evidence that there has been no other gap in training since 1/4/16.

In response to the June 9, 2017 deferral letter the school stated:

*JFPA Academy of Pet Styling did extensive research on these periods. While it is true that there were no students enrolled during these periods, it was, most certainly, through no lack of trying. During the first gap (10/19/14 – 1/5/15), we had a total of 21 prospective contacts, of which four toured the school, three of them were currently in high school and could not enroll, and more than half of them were unable to attend school if we did not offer any sort of financial aid (with the others not expressing why they couldn't come to school, though we suspect it was lack of finances.) During the second gap (11/21/15 – 1/4/16), we had a total of three prospective contacts, of which one took a tour. Two expressed that they could not attend due to lack of financing and one was still in high school. While the school was open and ready for business, **we were unable to assist students with their financial needs** [emphasis added]. Both of these gaps occurred during the holiday season, which has, historically, been a slow period of enrollment. In the past we have had a number of students actually put off school until after the busy holiday season. At the time we were still accepting students on an open enrollment. Open enrollment allowed students to start whenever they wanted to start, with no urgency. We*

¹ While there were other areas with which the Commission had concerns, those areas are not included as grounds for the denial because the Commission did not make an affirmative determination of noncompliance with the standards in those areas. Conversely, the Commission did not find that the school's response fully satisfied all of the Commission's questions or concerns as expressed in the June 9, 2017 letter.

have started the process of having students start school on specific term dates, which should help to eliminate the chance for gaps in the future.

In response to the Commission's directive to submit evidence that there has been no other gap in training since 1/4/16, JFPA provided a chart showing the ten student enrollments from 1/4/16 to present and stated:

*While we are enthusiastic about the fact that, for the great majority of that time, there were no gaps, there was a time from 11/22/16 – 2/27/17 that there was a gap. As mentioned with the other gaps that occurred, we were open and accepting students during this time. We had fifteen contacts, nine of which completed a tour. Nine of the fifteen students who inquired about the school during this gap openly expressed that they **could not attend if the school did not offer financial aid** [emphasis added]. Furthermore, we feel it is a possibility that the uncertainty caused by the 2016 Presidential Election with promises of free community college and forgiveness of student loans taken for college courses, created a temporary decline in enrollment for schools like ours.*

In addition the school stated:

*Just Four Paws Academy of Pet Styling feels that the main purpose of having a school is to improve the lives of our students. If a potential student cannot get financing, we cannot be of any help to that individual. There are a number of reasons why we have decided to seek accreditation – one being the ability to offer potential students financial aid in helping them to achieve their dream of working with animals. We feel that, **once accredited**, we will be able to remove a hurdle for most of these potential students and, by switching from open enrollment to specific terms, we **will eliminate the possibility for gaps** in the future [emphasis added].*

The Commission noted that the school's response revealed yet another unscheduled three month gap in training. The response indicates that the school feels it needs access to financial aid in order to demonstrate eligibility (i.e., to establish continuous operations and enrollments). The foundation of ACCSC's eligibility criteria in this regard is to ensure the school has the wherewithal to maintain operations on a continuous basis before being considered for accreditation. Thus, the nature of eligibility is such that it must exist prior to a grant of accreditation, not to be demonstrated after the fact. There is significant risk to students attending a school that cannot demonstrate the resources necessary to maintain continuous operation as a school – a risk which the Commission determined was not mitigated by the school's response or explanation. Based on the school's response, the Commission found that JFPA failed to demonstrate that the school meets the eligibility criteria for ACCSC accreditation by operating as a school providing education and training to students on a continuous basis (*Section I (E)(2)(b), Rules of Process and Procedures, Standards of Accreditation*).

2. JFPA failed to demonstrate that the program length is aligned with the program objectives (*Section II (A)(3)(c)(iii), Substantive Standards, Standards of Accreditation*). The on-site evaluation team found that the school offers a 300 hour and a 600 hour program in the area of pet grooming. JFPA described the differences between the two program lengths as students from the 600 hour programs graduate with more practice, a higher level of confidence, two Outstanding Pet Care certificates, and learn dog first aid. However, the objectives and level of employment outcomes did not differ in the school's descriptions of the two programs. The objectives of both programs indicated that students will graduate with "the skills needed to enter the job market as an entry-level pet stylist in grooming salons, veterinary clinics, mobile grooming, pet resorts and kennels; or the student could open his or her own

business.” Additionally, the level of employment outcomes (positions/placements) did not differ based on the number of clock hours attended.

In response to the TSR, the school asserted that the Program Advisory Committee advised the school that a 600-hour program with management content would be more valuable and that the school is therefore evaluating how to add a management course to the program and “changing the 600-hour program into a management course.” Also in response to the TSR, JFPA stated that since the launch of the 600 hour program three students have graduated, all before the on-site evaluation. Since the on-site evaluation, one student has enrolled.² Given the fact that the school was still evaluating and revising the program, the Commission determined that additional information regarding the 600-clock hour program was necessary. Therefore, the Commission directed the school to submit an Application for a New Non-Degree Program complete with supporting narrative and documentation as required in the application. The Commission specifically notified the school that the application must address the school’s assessment, decision, and final definition of the 600-clock hour program, particularly how the longer program will prepare students for a different level of employment (i.e., management) than the shorter program.

In response to the June 9, 2017 deferral letter the school submitted an Application for a New Non-Degree Program, as directed, for a 600-hour “Advanced Pet Styling and Salon Management.” The school’s program application indicates the following:

JFPA Academy of Pet Styling has offered a shorter, 300-hour, Professional Dog Styling Program that offers an accelerated program on how to complete successful styles of the different body parts of a dog. After discussing it during our Program Advisory Committee meetings, we have found that employers were frustrated with the lack of knowledge that their stylists had in terms of customer service, knowledge about how to answer customers’ questions about their pets, knowledge about pet first aid, working as a team player, etc. The employers came right out and said that graduates with those skills would be more valuable than those without.

Because the 300-hour Professional Dog Styling Program is already an accelerated program, we were unable to squeeze this additional information into the program. Therefore, we have decided to add the 600-hour Advanced Pet Styling and Salon Management program to teach these additional skills that employers are asking for.

JFPA Academy of Pet Styling started with a 300-hour program in Professional Dog Styling that teaches the basics on how to prep, bathe and groom dogs. These courses are the foundation of pet styling. This 300-hour program satisfies students who are only looking for a basic pet styling program. These students may have come from a background that includes experience working in the pet industry or maybe already has management experience from another industry.

² The on-site evaluation team noted that the 600 clock hour program was not operational at the time of the on-site evaluation and the TSR provided the school an opportunity to show special circumstances exist to include this program within the scope of institutional accreditation. ACCSC’s *Rules of Process and Procedure* state that “[f]or any program included in the Application for Initial Accreditation that is not operational and has no enrollment at the time of the Initial Accreditation On-Site Evaluation, the Commission will not include that program in the school’s scope of institutional accreditation unless the school demonstrates that special circumstances exist to otherwise do so” (*Section II (A)(1)(k), Rules of Process and Procedure, Standards of Accreditation*).

The 600-hour program is ideally geared for students who have no other animal experience and may not have any customer skills or management skills. Typically, these students can be recent graduates of high school or worked as an unskilled laborer. We have designed the 600-hour program to provide a basic foundation in dog styling and then added components such as Outstanding Pet Care, Red Cross CPR & First Aid, Animal Behavior and Introduction to Salon Management to accommodate those students who need more than basic styling skills, and anyone else interested in additional instruction in management and the animal industry.

After due consideration of the school's arguments, the Commission concluded that the school did not demonstrate that its final definition of the 600-clock hour program will prepare students for a different level of employment (i.e., management) than the shorter program or that the school's programs have clearly aligned learning objectives and outcomes. The Commission found that the school has not demonstrated that there is appropriate differentiation between the two programs or the viability of the design of the programs. The school did not clearly articulate differentiating objectives that support the rationale for offering a 300 hour and 600 hour program. The 600-hour "Advanced" program appears to be for students who "may" have management potential and at the same time is for students who have no animal experience or customer skills. The 300-hour program is for more experienced students but indicates that it is designed for students looking for the "basics" and "foundation" of pet styling. However, neither the response nor the stated program objectives demonstrate that the program(s) are designed in alignment with generally accepted practices to show clearly defined program objectives for each program. The ability to develop, design, and offer well-structured programs to students with clearly defined and articulated objectives is a critical component of an accredited institution. JFPA's failure to make this fundamental showing led the Commission to conclude that students would not have clear and aligned educational and occupational pathways – two elements amongst several others necessary to receive a grant of accreditation. Accordingly, the Commission found that JFPA failed to demonstrate that the program length is aligned with the program objectives (*Section II (A)(3)(c)(iii), Substantive Standards, Standards of Accreditation*).

Based upon the foregoing, the Commission voted to deny a grant of accreditation to Just Four Paws Academy of Pet Styling in accordance with *Section VII (N)(1), Rules of Process and Procedure, Standards of Accreditation* and remove the school from the ACCSC list of accredited institutions.

In accordance with *Section X, Rules of Process and Procedure, Standards of Accreditation*, the reasons for the denial are made public and provided to the U.S. Department of Education, appropriate state agencies, and appropriate accrediting agencies.

APPEAL AND REAPPLICATION PROCESS AND PROCEDURE

JFPA may opt to appeal the Commission's decision to deny 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 JFPA 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 December 28, 2017.**
- If JFPA 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 January 15, 2018.**



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LETTER OF INTENT TO APPEAL A COMMISSION DECISION

To Be Submitted No Later Than December 28, 2017

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

Dear Dr. McComis:

This letter serves to provide notice that Just Four Paws Academy of Pet Styling (“JFPA”) located in Erie, Pennsylvania intends to appeal the recent decision of the Commission to withdraw the school’s accreditation and remove the school from the list of ACCSC-accredited institutions. Attached is a check in the amount of \$6,000 as required by accreditation procedures. I understand that this fee is non-refundable.

I understand that the ACCSC Appeals Panel will meet to consider the appeal of the school and that I will receive final confirmation of the hearing at a later date. I have reviewed *Section VIII, Rules of Process and Procedure* of the *Standards of Accreditation* pertaining to appeals and noted that I am entitled to a transcript of the proceedings and to have representatives, including legal counsel, present with advance notification to ACCSC.

I understand that it is the right of a school to appeal an adverse action taken by the Commission on the grounds that the decision was arbitrary, capricious, or otherwise in disregard of the criteria or procedures of the Commission, or not supported by substantial evidence in the record on which the Commission took the action (*Section VIII (B), Rules of Process and Procedures, Standards of Accreditation*). I understand that because the appeal must be based on evidence in the record at the time that the Commission took the adverse action, no new evidence may be submitted during the appeal process, other than information related to the financial solvency and condition of the school.

I understand it is the right of a school intending to appeal a Commission decision to indicate whether there is good cause as to why any member of the Commission’s Standing Appeal Panel should not hear the appeal. I have reviewed the list of Standing Appeal Panel members and have included with this notice any objections to any member of the Standing Appeal Member with the reasons and cause why I believe a member should not hear the school’s appeal. I understand the absence of a submission with this notice indicates my approval to allow any member of the Standing Appeal Panel to sit for the school’s appeal.

I understand that the Application for Appeal of Commission Decision with the school’s Grounds for Appeal are due to ACCSC **on or before January 15, 2018**, and I agree to submit that material on or before that date. I understand that failure to submit these required documents by the due date could prevent consideration of the school’s appeal.

Signature

Date

Name/Title

ACCSC Standing Appeals Panel Members

Panel Member	Affiliation	Term Ending
Gary Baker	U.S. Department of Education (Retired) Springfield, Virginia <i>Public Member</i>	2019
Paul Bott, Ed.D.	Pacific College Costa Mesa, California <i>Public Member</i>	2020
Nancy Bradley	Daytona College Ormond Beach, Florida <i>School Member</i>	2020
Mary Cano	Western Technical College El Paso, Texas <i>School Member</i>	2018
Paul Fitzgerald	Erie Institute of Technology Erie, Pennsylvania <i>School Member</i>	2019
Lorne P. Gauthier	Northwest Technological Institute Southfield, Michigan <i>School Member</i>	2017
William James	U.S. Department of Education (Retired) Fairfax, Virginia <i>Public Member</i>	2019
Timothy McMahon	Triangle Tech Pittsburgh, Pennsylvania <i>School Member</i>	2020
Kathleen J. Steinberg	Midwest Technical Institute Lincoln, Illinois <i>School Member</i>	2018
Raymond Tuttle, Ph.D.	University of Mary Washington Fredericksburg, Virginia <i>Public Member</i>	2020



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PUBLIC COMMENT DISCLOSURE FORM

To Be Submitted No Later Than December 28, 2017

Michale S. McComis, Ed.D.
Executive Director
ACCSC
2101 Wilson Boulevard, Suite #302
Arlington, Virginia 22201

RE: Just Four Paws Academy of Pet Styling
 1530 W. 26th St., Ste. I
 Erie, Pennsylvania 16508

Dear Dr. McComis:

I understand and agree that the Commission, pursuant to *Section X (C)(4)&(D)(4), Rules of Process and Procedure, Standards of Accreditation*, will make public the reasons for the decision together with any comments submitted by the school. I further understand that the summary will be accompanied by the attached comments.

I understand and agree that the attached comments constitute Just Four Paws Academy of Pet Styling’s public comments on the adverse accreditation action that are to be disseminated with the public notice of the Commission’s adverse accreditation decision including, but not limited to, dissemination to appropriate federal, state and other accrediting agencies and posting to the ACCSC website (*Section X (C)(4)&(D)(4), Rules of Process and Procedure, Standards of Accreditation*).

I understand and agree that the school is not obligated to submit public comments and acknowledge that the attached comments are provided voluntarily.

I understand and agree that the public comments must be in summary format, professional in tone, and free of profanity and calumnious statements. I acknowledge that any comments which do not meet these requirements will not be disseminated or posted along with the summary of the reasons for the adverse accreditation decision.

I understand and agree that the Commission will release its summary of the adverse accreditation decision to the public pursuant to the Commission’s *Rules of Process and Procedure, Standards of Accreditation* and that the school’s written comments will not be added to this disclosure if this form and comments are not submitted in the required format **on or before December 28, 2017.**

I understand and agree that the Commission has no responsibility for how the school’s comments may be used once they are put in the public domain.

Signature

Date

Name/Title