



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

July 13, 2016

ELECTRONIC DELIVERY & FEDERAL EXPRESS

Jessica Pearson-Cain
President/CEO
Cain's Barber College
365 E. 51st Street
Chicago, Illinois 60615

School #M058683

Dear Ms. Pearson-Cain:

On July 1, 2016, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) issued a letter to Cain’s Barber College located in Chicago, Illinois withdrawing the school’s accreditation and informed the school of its right to appeal that decision. As of the date of this letter, the school has not filed the Letter of Intent to Appeal a Commission Decision as provided in the July 1, 2016 letter from ACCSC. Accordingly, the Commission’s decision to remove Cain’s Barber College from the list of ACCSC accredited schools is final effective July 11, 2016 (*Section VII (B)(3), Rules of Process and Procedure, Standards of Accreditation*).

Cain’s Barber College must immediately inform all students enrolled in the school and those seeking admission that accreditation by ACCSC has been withdrawn and delete all references to and claims of ACCSC accreditation from catalogs, advertising, and promotional materials immediately and in no event later than August 11, 2016, 30 days after the withdrawal of accreditation decision became final (*Section VII (P)(4)(a-b), Rules of Process and Procedure, Standards of Accreditation*).

Pursuant to *Section VII (P)(6), Rules of Process and Procedure, Standards of Accreditation*, Cain’s Barber College may reapply for accreditation after a period of nine (9) months and thus may only submit an Application for Initial Accreditation after April 11, 2016. The school will be required to adhere to all applicable application processes set forth in the Commission’s *Rules of Process and Procedure*.

For further information or assistance regarding this matter, please contact me directly at 703.247.4520 or mccomis@accsc.org

Sincerely,

Michale S. McComis, Ed.D.
Executive Director



Accrediting Commission of Career Schools and Colleges

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July 1, 2016

**ELECTRONIC DELIVERY &
FEDERAL EXPRESS**



Jessica Pearson-Cain
President/CEO
Cain's Barber College
365 E. 51st Street
Chicago, Illinois 60615

School #M058683

Dear Ms. Pearson-Cain:

At the May 2016 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to issue a Warning Order for Cain’s Barber College located in Chicago, Illinois along with the school’s Heightened Cash Monitoring 2 (“HCM2”) status with the U.S. Department of Education (“the Department”) and subsequent loss of Title IV federal student aid. Upon review of the Commission’s December 11, 2015 Warning Order, March 28, 2016 letter regarding the school’s HCM2 status, May 3, 2016 letter regarding the school’s loss of Title IV, and the school’s responses, the Commission found that the school failed to meet the burden to demonstrate continuous compliance with the Standards of Accreditation (*Section I (E)(1) & (2)(a), Rules of Process and Procedure, Standards of Accreditation*). Therefore, the Commission voted to withdraw the accreditation of Cain’s Barber College and to remove the school from the list of ACCSC-accredited institutions (*Section VII (P)(1), Rules of Process and Procedure, Standards of Accreditation*). The history of the Commission’s review and reasons for the Commission’s decision to withdraw Cain’s Barber College’s accreditation are set forth below.

HISTORY OF COMMISSION REVIEW

November 2015

At the November 2015 meeting, the Commission considered Cain’s Barber College’s Application for Renewal of Accreditation and Refund Report.¹ Upon review of the August 5, 2015 Team Summary Report and the school’s response to that report, the Commission voted to place Cain’s Barber College on Warning and directed the school’s attention to eleven areas required by accrediting standards.

March 28, 2016

The Department copied the Commission on a March 17, 2016 notice to Cain's Barber College. The notice disclosed that the Department transferred Cain’s Barber College from the Heightened Cash Monitoring 1 (“HCM1”) method of payment to the Heightened Cash Monitoring 2 method of payment effective March 17, 2016. According to the notice, the Department took this action because of “concerns regarding the financial responsibility demonstrated by Cain.” The action taken by the Department to restrict the disbursement of financial aid through the HCM2 system of payment raised concerns regarding the Cain's Barber College’s ability to operate in accordance with accreditation standards and capacity to meet educational obligations to students. Therefore, the Commission directed the school to provide information regarding the school’s financial capacity and a completed ACCSC Institutional Teach-Out Plan Approval Form.

¹ Please see more information about the Commission’s review of Cain’s Barber College’s processing of refunds in item #3 of the May 2016 Review and Action section below.

May 3, 2016

The Department copied ACCSC on the April 27, 2016 notice to Cain's Barber College disclosing that the Department denied the school's application for recertification to continue to participate in the federal student financial assistance programs. The notice also states that the school is no longer eligible to participate in the student financial assistance programs authorized pursuant to Title IV of the Higher Education Act effective April 30, 2016. According to the notice, the Department determined that Cain's Barber College failed to meet the standards set forth in 34 C.F.R. Part 668 based on owner default on a Title IV loan, Cain's Barber College's repeated failure to comply with the Title IV refund requirements, and five open tax liens that the school has with the State of Illinois.

May 2016 Review and Action

1. Cain's Barber College 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*). Specifically, the school failed to provide audited comparative financial statements for fiscal years ending December 31, 2014 and December 31, 2015 in accordance with requirements set forth in *Section V (C)(1), Rules of Process and Procedure, Standards of Accreditation* and ACCSC's Instructions for the Preparation and Submission of Financial Statements and Related Information. As directed in the December 11, 2015 Warning letter, the school also failed to submit a Management Discussion and Analysis ("MD&A") examining and explaining the school's current financial condition. Based on the partial audit of December 31, 2015 financial information provided by the school, the Commission noted that the school recorded the following:
 - A net working capital deficit of \$578,298 (\$353,087 current assets to \$931,385 current liabilities);
 - A negative cash balance of \$101;
 - Payroll taxes payable of \$388,121; and
 - A net decrease in cash of \$21,886.

Exacerbating the Commission's concerns that Cain's Barber College's financial structure is not sound with resources sufficient to meet its obligations to students is the April 27, 2016 notice from the Department that, effective April 30, 2016, the school is no longer eligible to participate in the student financial assistance programs authorized pursuant to Title IV of the Higher Education Act. In response to the May 3, 2016 Commission letter, Cain's Barber College indicated that the school started a marketing strategy to recruit Veterans; is working with United Parcel Service for the company to pay the school for employees to attend the institution; and "applied for a small business loan to assist in providing a stronger cushion to ensure that the school is able to continue its daily operation without a disruption to students." The school indicated that income from the clinical floor along with reserves has allowed the school to maintain its daily operations and that the school has "reduced its work force which has provided a substantial savings." The Commission, however, also determined that the school has failed to demonstrate compliance in areas related to the adequacy of the school's management and did not find a reduction in force to be compelling evidence that the school can achieve compliance with accreditation standards.

Accordingly, because the school has failed to submit audited comparative financial statements for two years as required and because the school currently has reported a significant net working capital deficit, a negative cash balance, a net decrease in cash, and a sizable payroll tax liability, the

Commission determined that Cain's Barber College 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.

2. Cain's Barber College failed to demonstrate that the school has adequate management and administrative capacity and can operate in compliance with accrediting standards, meet its objectives, and fulfill its obligations to students in an ongoing manner (*Section I (A), Substantive Standards, Standards of Accreditation*). Additionally, Cain's Barber College did not 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)(3), Substantive Standards, Standards of Accreditation*). In response to the December 11, 2015 Warning letter, the school provided brief job descriptions for the six members of the school's management staff and documentation of professional development activities that occurred from September 1, 2015 through February 29, 2016. The Commission found, however, that the school did not submit information to include the individuals' qualifications for their particular roles, such as appropriate education, training, and experience commensurate with the level of responsibilities. Given the number of substantial issues and areas of non-compliance cited herein, the Commission found that Cain's Barber College failed to show that its current management staff can operate the school in compliance with accrediting standards as required.

The Commission also found that Cain's Barber College did not provide a description of professional development activities or documentation of activities that occurred for this six-month timeframe for Jessica Pearson-Cain (CEO/President); Tracy Smith (Executive Vice President); Brittany Cain-Ishmael (Vice President); Michael Wilson (Director of Admissions); and Sherry Hunter (Student Service Director), five of the six management team members listed. While Cain's Barber College provided documentation that Irene Youngblood (Education Director) attended The Use of Machines & Implements class by JBS Educational Association Advanced Training Center on March 22, 2016 and America's Beauty Show on March 14, 2016, the school did not explain how these activities support Ms. Youngblood's role as Education Director. Additionally, while the school provided documentation that Taquala Shack, Financial Aid Director, participated in an Experimental Sites Webinar – Second Chance Pell webinar and Arnell Givens, not listed on the organizational chart, attended America's Beauty Show, the school did not identify these individuals as part of the management team.

Based on the foregoing, the Commission found that Cain's Barber College failed to demonstrate that the school has adequate management and administrative capacity and can operate in compliance with accrediting standards, meet its objectives, and fulfill its obligations to students in an ongoing manner and that members of school management and administrative employees participate in ongoing development and training activities that support their particular roles in the school.

3. Cain's Barber College failed to demonstrate that the school makes timely refunds in accordance with the school's published refund policy (*Section I (D)(5), Substantive Standards, Standards of Accreditation*). The Commission noted the school's inability to manage the tuition refund process as follows:
 - January 26-27, 2012 Renewal On-Site Evaluation: The on-site evaluation team found four late refunds – for one student, the refund was 107 days late, and for the remaining three students, the refunds were still unpaid and overdue by 88, 270, and 315 days, respectively.

- August 2012 Show Cause Order: Given the school's assertion that late refunds were due to "administrative oversight" and considering the Commission's concern about the administrative capacity of the school's management team, the Commission determined that additional monitoring of the school's issuance of refunds was warranted.
- February 2013 Continued Show Cause Order: The Commission noted that the school explained the refunds in question were late because the individual responsible for calculating refunds was out of the office under medical care for approximately seven weeks. The Commission questioned the school's administrative capacity in that the school did not appear to have a sufficient contingency plan in place to administer student refunds on an ongoing basis and directed the school to provide a Refund Report to the team conducting the Commission-Directed Announced On-Site Evaluation.
- June 21, 2013 Commission-Directed Announced On-Site Evaluation: The on-site evaluation team found the school's practice is to make refunds within 45 days of the date the school determines the student to have withdrawn. The team found that this practice does not align with the school's refund policy published in the catalog at the time of the on-site evaluation which stated: "...any refunds will be made within 30 days from the last date of student attendance or within 30 days from the last date of receipt of payment in the event that the date of such receipt is after the student's last date of attendance."
- August 2013 Renewal of Accreditation: The Commission granted the school renewal of accreditation for a period of three years, with the requirement that the school submit a Refund Report with regard to the school's refund policy and documentation of its fair and equitable application.
- March 2014 Refund Report: The Commission reviewed the school's Refund Report and continued the school on Refund Reporting.
- December 2014 Refund Report: The Commission reviewed the school's Refund Report and continued the school on Refund Reporting. The Commission forwarded the review of refund processing to the renewal of accreditation process and directed the school to provide a Refund Report for review as part of the renewal on-site evaluation.
- March 18-19, 2015 Renewal On-Site Evaluation: The on-site evaluation team found that refunds were not made in a timely manner in accordance with the school's stated policy for eight students, ranging from 13 to 583 days late.
- November 2015 Commission Meeting: The Commission found that Cain's Barber College did not provide documentation to demonstrate that the school issues refunds "within thirty days from the date of determination of withdrawal or termination" as stated in the school's response.

In response to the December 11, 2015 Warning letter, Cain's Barber College submitted its institutional refund policy and refund information for six students who were either dismissed or withdrew between October 1, 2015 and February 29, 2016. In reviewing the response, the Commission found that the school did not include individual attendance records or, more importantly, copies of electronic refund transactions and/or checks issued for the purpose of student refunds. The Commission also found that the Refund Report Summary Sheet lists only one student, [REDACTED]. While this summary sheet shows the last date of attendance and date of determination of withdrawal/termination for [REDACTED] as January 5, 2016 with a refund due date of February 19, 2016, the school did not provide a refund paid date for this student. Additionally, on the Refund

Report Worksheet for [REDACTED] the school listed the student's last date of attendance as October 9, 2015 and date of determination of withdrawal/termination as January 12, 2016 but did not explain this three-month gap. Based on the foregoing, the Commission found that Cain's Barber College failed to demonstrate that the school makes timely refunds in accordance with the school's published refund policy.

- Cain's Barber College failed to demonstrate successful student achievement by maintaining acceptable rates of student graduation and graduate employment in the career field for which the school provides education as well as acceptable pass rates on licensure/certification exams. Additionally, Cain's Barber College did not demonstrate that the school supports these rates through verifiable records and documentation of initial employment of its graduates (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). In response to the December 11, 2015 Warning letter, the school reported the following student achievement rates using a February 2016 Report Date on the Graduation & Employment Chart:

Program (Credential)	Length in Months	Cain's Graduation Rate	ACCSC Benchmark Graduation Rate	Cain's Employment Rate	ACCSC Benchmark Employment Rate
Barber Stylist (Diploma)	13	48%	51%	93%	68%

The Commission found that Cain's Barber College reported a graduation rate for the 13-month Barber Stylist program that falls below ACCSC's student achievement benchmark rate.² More importantly, however, in addition to the reported graduation rate being below benchmark, the Commission noted the following discrepancies based on the information submitted by the school to support the student achievement rates reported on the Graduation and Employment Chart:

- The school reported 62 student starts with 30 graduates and 32 withdrawn/terminated students on the Graduation & Employment Chart. However, the school listed 79 student starts with 28 graduates, 49 withdrawn/terminated students, and 2 students without a designation on the student roster.
- The school listed an additional 11 students, beyond the 79 above, with start dates from prior to or after the Graduation & Employment Chart reporting period.
- Although Cain's Barber College reported 28 graduates as "Employed in Field" on the Graduation & Employment Chart, the school provided a list of only 10 graduates employed in field and failed to include any employment information including contact information; dates of initial employment; places of employment; employer addresses and phone numbers; employer contacts; or descriptive job titles and duties.

Overall, the Commission again found that Cain's Barber College failed to provide sufficient or reliable information to support the graduation and employment rates reported by the school. As such, the school neither reported a graduation rate that meets the Commission's benchmark rate nor supported the information submitted with reliable records as required.

- Cain's Barber College failed to demonstrate successful student achievement by maintaining acceptable pass rates on licensure/certification exams (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). As part of the December 11, 2015 Warning letter, the Commission

² *Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VI - Student Achievement Rates.*

directed the school to indicate whether each graduate reported on the Graduation & Employment Chart took the required Illinois Department of Financial & Professional Regulation licensure examination and whether the graduate passed the examination. In its response, Cain's Barber College provided a chart of eleven graduates with three students taking the examination, one who passed (██████████), one who did not (██████████) and one that the school did not indicate whether the student passed or failed (██████████). Additionally, the school provided results from Continental Testing Services showing the following licensure results:

Student Name	Examination Date	Overall Exam Results
██████████	January 25, 2016	Incomplete for licensure
██████████	March 24, 2016	Incomplete for licensure
██████████	February 4, 2016	Pass*
██████████	March 16, 2016	Pass
██████████	February 29, 2016	Incomplete for licensure
██████████	Not listed	Incomplete for licensure

* Although the school's roster does not indicate whether ██████████ passed or failed the licensing examination, the results from Continental Testing Services show that he passed the examination.

Accrediting standards state that for those programs where a governmental entity requires the attainment of a passing score on a licensure/certification exam in order to work in a particular field, the Commission determines a program's licensure/certification exam pass rate to be acceptable when at least 70% of the students that take the exam attain a passing score. Based on the information provided, Cain's Barber College failed to demonstrate successful student achievement through an acceptable pass rate on licensure/certification exams. These results also bring into question the legitimacy of the employment rate reported on the Graduation and Education Chart since licensure is required in Illinois to work in the Barber Stylist field.

6. Cain's Barber College failed to demonstrate that the school remains attentive to students' educational and other needs (*Section VI (Statement of Purpose), Substantive Standards, Standards of Accreditation*). In the December 11, 2015 Warning letter, the Commission directed the school to submit summary results of a student survey of a sample of not less than 50% of the student population as well as a detailed analysis of the student survey results with a particular focus on any results that show less than 80% satisfaction and the school's plan to address any area of student dissatisfaction, if applicable. In its response, Cain's Barber College submitted survey results of 14 students conducted in January 2016. In reviewing these results, the Commission found that the school did not include any results in the area of training equipment and overall educational experience. Additionally, the survey results show lower rates student satisfaction in the following areas:

- Financial Aid: 71%
- Academic Progress: 71%
- Student Services: 65%
- Library/Learning Resource System: 64%
- Facility: 52%

The school also submitted a summary of the students' written comments expressing the reasons for dissatisfaction. Comments include student concerns about student services cutbacks resulting in fewer hours for Student Services Director Sherry Hunter to assist students; the length of time it took for students to receive equipment; and equipment and products not being available at all times. While Cain's Barber College included proposals from the Student Services Director, such as distributing

movie tickets, creating an Introduction to College course, and holding a 5K run and walk, the Commission found that the school failed to provide a detailed analysis of the student survey results for those specific areas where students expressed dissatisfaction as the Commission had requested in the December 11, 2015 Warning Order.

Based on the survey results that continue to show student dissatisfaction in key areas of the school, the lack of analysis regarding the survey results that includes pinpointed strategies to improve student satisfaction levels, and the school's reduction of work force that appears to be having a deleterious impact on the availability of student services, the Commission found that Cain's Barber College failed to demonstrate that the school remains attentive to students' needs.

Based upon the foregoing, the Commission voted to withdraw the accreditation of Cain's Barber College 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 Withdrawal Order are made public and provided to the U.S. Department of Education, appropriate state agencies, and appropriate accrediting agencies.

TEACH-OUT PLAN

Pursuant to federal law, an accrediting agency recognized by the U.S. Department of Education must require a teach-out plan from an institution subject to an adverse accreditation decision to withdraw accreditation. Therefore, in accordance with *Section IV (F)(1)(c) Rules of Process and Procedure, Standards of Accreditation* the Commission requires that Mueller College submit a completed ACCSC Institutional Teach-Out Plan Approval Form,³ to demonstrate how Mueller College will ensure the opportunity for students to complete their program of study. The school Teach-Out Plan should be submitted **on or before July 18, 2016.**

APPEAL AND REAPPLICATION PROCESS AND PROCEDURE

Cain's Barber College 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 Cain's Barber College 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 July 11, 2016.**
- If Cain's Barber College 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 August 1, 2016.**
- If Cain's Barber College elects not to appeal this decision, the Commission's decision will become effective **July 11, 2016.** The school may submit comments **on or before August 1, 2016** 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*.

³ Available online at: <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>

For additional information regarding the Commission's decision, please contact me directly at 703.247.4520 or mcomis@accsc.org.

Sincerely,



Michale S. McComis, Ed.D.
Executive Director

c: Tracy Smith

[REDACTED]

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



Accrediting Commission of Career Schools and Colleges

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LETTER OF INTENT TO APPEAL A COMMISSION DECISION

To Be Submitted No Later Than July 11, 2016

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 Cain’s Barber College located in Chicago, Illinois 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 August 1, 2016**, 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



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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
Nancy Bradley	Daytona College Ormond Beach, Florida <i>School Member</i>	2016
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>	2016
Cedric D. Page, Ph.D.	University of New Mexico – Los Alamos Los Alamos, New Mexico <i>Public Member</i>	2019
Kathleen J. Steinberg	Midwest Technical Institute Lincoln, Illinois <i>School Member</i>	2018



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PUBLIC COMMENT DISCLOSURE FORM

To Be Submitted No Later Than August 1, 2016.

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

RE: Cain’s Barber College
365 E. 51st Street
Chicago, Illinois 60615

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 a summary of 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 Cain’s Barber College 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 August 1, 2016.**

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