



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](http://www.accsc.org)

September 29, 2016

**ELECTRONIC DELIVERY & FEDERAL EXPRESS**

Amir Baniassad  
Director  
JEM College  
271 Ott Street, Ste. 23  
Corona, California 92882-7104

**School #M070204**

Dear Mr. Baniassad:

On September 8, 2016, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) issued a letter to JEM College located in Corona, California withdrawing the school’s accreditation and informing 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 September 8, 2016 letter from ACCSC. Accordingly, the Commission’s decision to remove JEM College from the list of ACCSC accredited schools is final effective September 19, 2016 (*Section VII (B)(3), Rules of Process and Procedure, Standards of Accreditation*).

JEM 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immediately inform all students enrolled in the school and those seeking admission that accreditation by ACCSC has been withdrawn and delete all references to and claims of ACCSC accreditation from catalogs, advertising, and promotional materials immediately and in no event later than October 19, 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*).

With regard to the nine-month waiting period required by *Section VII (P)(5), Rules of Process and Procedure, Standards of Accreditation*, the Commission reviewed JEM College’s request to waive the nine-month waiting period. The Commission found that while JEM College indicated that students are currently enrolled – 3 students from the April 25, 2016 start and 7 students scheduled to start on September 26, 2016 – the school again provided no specific proof of enrollment. Therefore, the Commission voted to defer action on the school’s waiver request until the school can provide a list of all currently enrolled students, copies of signed enrollment agreements for all currently enrolled students and signed attestations from all currently enrolled students stating that the student is either currently attending classes or scheduled to begin attending classes along with the scheduled start date. The Commission intends to review this matter again at its November 2016 meeting and a failure to provide this information or to provide incomplete or inaccurate information will result in a denial of the school’s request. The Commission must have clear and irrefutable evidence demonstrating the school has been operating training students since April 25, 2016 as had been previously stated to the Commission.

If the Commission does not grant the school’s request to waive the nine-month waiting period, JEM College will be able to reapply for accreditation after June 19, 2017.<sup>1</sup> The school will, of course, be required to adhere to all applicable application processes set forth in the Commission’s *Rules of Process and Procedure*.

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<sup>1</sup> In addition, in order to re-apply with ACCSC, all outstanding balances will also need to be paid prior to the acceptance of the school’s application.

*JEM College – Corona, CA  
School #M070204  
September 29, 2016  
Page 2 of 2*

For further information or assistance regarding this matter, please contact me directly at 703.247.4520 or [mccomis@accsc.org](mailto:mccomis@accsc.org).

Sincerely,



Michale S. McComis, Ed.D.  
Executive Director

c: U.S. DEPARTMENT OF EDUCATION  
U.S. Department of Education – San Francisco SPT  
U.S. Department of Education – Administrative Actions and Appeals Division  
CA - California Bureau for Private Postsecondary Education  
CA - California Department of Public Health- Radiologic Health Branch



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Amir Baniassad  
Director  
JEM College  
271 Ott Street, Ste. 23  
Corona, California 92882-7104

**School #M070204**

Dear Mr. Baniassad:

At the August 2016 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for a Change of Ownership-Part I and Part II and the Application for a Change of Location-Part I and Part II for JEM College (“JEM”) located in Corona, California. The Commission’s concerns regarding JEM College’s compliance with accrediting standards arose in conjunction with the materials submitted as part of the school’s changes of ownership and location. Upon review of the entire record, including:

- The Application for a Change of Ownership-Parts I and II;
- The Application for a Change of Location-Parts I and II;
- The school’s Waiver Request;
- The Commission’s letter dated February 5, 2015;
- The May 16, 2016 Team Summary Report (“TSR”) from the on-site evaluation as required by the school’s changes of ownership and change of location; and
- The school’s response to that report;

the Commission determined that JEM has not been in continuous operation training students as required to maintain eligibility for accreditation with ACCSC (*Section I (E)(2)(b), Rules of Process and Procedure, Standards of Accreditation*). Accordingly, the Commission voted to revoke the accreditation of JEM and to remove the school from the ACCSC list of accredited institutions. The history of the Commission’s review of the school and the reasons for this decision are set out below.

#### **2014**

- **December 19, 2014:** Joseph Melanson, owner of JEM College at the time, contacts Juanita Gurubatham via e-mail, giving ACCSC permission to release information to Dirk Been, prospective buyer (from ACCSC’s records regarding Application for Change of Ownership-Part I).

#### **2015**

- **January 5, 2015:** JEM College submits an Application for a Change of Ownership-Part I (from ACCSC’s records). The school reports 16 students currently enrolled. The proposed date of sale is March 1, 2015 to Mover Services, Inc. Additional information is submitted January 30, 2015 and March 6, 2015.
- **March 20, 2015:** ACCSC approves the Application for a Change of Ownership-Part I.
- **April 29, 2015:** Joseph Melanson informs Juanita Gurubatham, via e-mail, that Mover Services, Inc. has backed out of the change of ownership transaction. In the same message, Mr. Melanson indicates that Amir Baniassad has expressed interest in purchasing JEM College and requests that a letter regarding the current accreditation status of the school be provided to Mr. Baniassad.

- **August 12, 2015:** JEM College submits an Application for Change Ownership-Part I. The school reports zero students currently enrolled. The proposed date of sale is September 15, 2016 to Mr. Amir Baniassad.
- **September 11, 2015:** ACCSC approves the Application for a Change of Ownership-Part I.
- **October 21, 2015:** JEM College submits an Application for a Change of Ownership-Part II, informing ACCSC that the transaction between Mr. Melanson and Mr. Baniassad had been executed on October 15, 2015. Student enrollment as of October 15, 2015 is reported to be zero.
- **November 13, 2015:** Sahar Andisha, Director of Operations for JEM College, contacts Juanita Gurubatham via e-mail to inform ACCSC of the school's intent to change location by December 19, 2015. Ms. Andisha acknowledges that the school will be unable to comply with ACCSC's requirement that a school must apply to the Commission at least 60 days prior to its intended move date by filing an Application for a Change of Location-Part I. In addition, Ms. Andisha's message stated the following:

*When JEM College was acquired it did not have any students, faculty or administrative staff, so fortunately for us, this move will not impact any students or the operations of JEM College and we are moving all of the programs and equipment acquired through the change of ownership. Mr. and Mrs. Melanson will soon submit to their property management company a 30 day notice to vacate for the date, December 19, 2015, at which time we must vacate all the equipment purchased under the Asset Purchase Agreement.*

- **November 16, 2015:** ACCSC issues a letter informing JEM College that the school may not have maintained compliance with accrediting standards that require schools operate – providing education and training to students – on a continuous basis (*Section I (E)(2)(b), Rules of Process and Procedure, Standards of Accreditation*) and the approval of the change of ownership provided no waiver of that threshold eligibility requirement. The letter states,

*As such, it appears that JEM College has not maintained its eligibility for accreditation as the school has not been providing education and training to students on a continuous basis... therefore the Commission will consider the school's accredited status at its December 2015 meeting. JEM College may submit any additional information deemed appropriate to demonstrate to the Commission that the school has maintained its eligibility for ACCSC accreditation.*

- **November 23, 2015:** JEM College submits an Application for a Change of Location-Part I. In describing the impact of the move on students, the school's operations, and the student's ability to continue training, JEM College stated the following:

*When JEM College was acquired on October 15, 2015, the school did not have any students. Due to their failing health and the need to sell or close JEM College, the previous ownership prudently did not enroll any new students when the final student graduated in June of 2015, pending certainty of JEM College's future... in anticipation of JEM's move, JEM has not yet enrolled any students in [sic]... every effort has been made to ensure the move is well-planned and efficient and for the new location to be ready for operations no later than December 23, 2015. JEM College plans to start its first class in the new location on February 1, 2016.*

- **November 29, 2015:** In response to ACCSC's letter of November 16, 2016, JEM College applied for waiver of the ACCSC eligibility standard that requires schools to operate providing education and

training to students on a continuous basis (Section I (E) (2)(b), Rules of Process and Procedure, Standards of Accreditation) According to the narrative submitted by the school,

*Between June-October of 2015, the period during which JEM's change of ownership was being negotiated and finalized, JEM College's previous owners implemented a temporary hold on enrollment of new students which resulted in an unwitting violation of the above mentioned standard when the last student graduated. The new policy was put in place, not to circumvent accreditation standards, but rather, to protect new students in the event that negotiations were canceled or regulatory change of ownership approvals were denied and JEM College was forced to close.*

The waiver request is primarily predicated on the school's assertion that JEM College had been operational, even in the absence of training students, by remaining open to support the needs of former students including employment assistance, tutoring for the state exam, and assistance to fulfill eligibility requirements to obtaining state licensure for the period June 2015 through October 2015. The school also provided documentation to show that there were administrators present including: hand-written telephone messages, copies of telephone bills, electric bills, and visitor sign-in sheets.

- **December 8, 2015:** JEM submitted an addendum with additional information to ACCSC regarding the waiver request. The school indicated that "...the new ownership must wait for the issuance of a new school identification number and approval of our associated clinical affiliations before we can enroll new students." According to JEM's submission, the school expected to receive that approval "immediately."
- **December 28, 2015:** ACCSC issues a school action letter detailing the Commission's consideration of the waiver request and vote to request additional information before reaching a final decision. In particular, the Commission noted the following:

*In the waiver request, JEM College stated that the former owner elected not to enroll new students during the recent change of ownership process due to concerns that if the change of ownership was not consummated the school would not be financially sound enough to meet obligations for those new students through the completion of the program. ACCSC approved the Change of Ownership-Part I and although ACCSC was aware there would be a break in enrollments while the contract was being finalized, the school did not make clear that the current students would graduate before enrollments resumed and that new enrollments would not resume immediately after the transaction – resulting in JEM College's current situation where the school has had no students enrolled since June 2015.*

*JEM College stated that the school must obtain final approval from the California Department of Public Health ("CDPH") for the issuance of a new school identification number and approval of the clinical locations before enrolling students. As such, the new ownership did not enroll a new class of students subsequent to the change of ownership.*

The Commission requested additional information with respect to the requirements for recognition of licensure by means of accreditation ("LBMA") by the Bureau of Private Postsecondary Education ("the Bureau") and the issuance of a new school identification number by CDPH.

## **2016**

- **January 8, 2016:** JEM College submitted a response to the Commission's December 28, 2015 letter. With regard to requirements of continuous enrollment by the Bureau, the school states:

*While we did not find any Bureau regulations or State of California legislation pertaining to requiring private postsecondary institutions to continuously operate with an enrollment of paying students through a change of ownership or otherwise, we did find sections that explicitly state the Bureau's highest priority is consumer protection.*

With regard to the authorization by CDPH, the school supplied documentation showing that the new owners are not authorized to enroll new students until the CDPH issues to the school a new school identification number as part of the change of ownership procedure. The response includes an e-mail message dated January 8, 2016 from George Cervantes of the CDPH indicating that the school's application had been reviewed and identifying two items that the school must address.

- **February 5, 2016:** At the February 2016 meeting, the Commission considered the school's response and took into account JEM College's November, December, and January responses. The Commission determined that a waiver of the eligibility requirement was not necessary due to the CDPH licensure issue and requirement that no new student be enrolled until a new license has been issued. However, due to the magnitude of the changes at the school since June 2015, the Commission directed the school to enter the reaccreditation process immediately.
- **February 8, 2016:** ACCSC approved the Application for a Change of Ownership-Part II, effective as of the transaction date, October 15, 2015.
- **March 25, 2016:** JEM submitted the Application for a Change of Location-Part II, reporting the current number of students as two.
- **April 14, 2016:** ACCSC conducted the on-site evaluation to review operations of the school under the new ownership. This on-site evaluation occurred within six months of the date of the Change of Ownership, as required. As stated in the May 16, 2016 Team Summary Report:

*[t]he purpose of this on-site evaluation, in part, is to evaluate the operation of the school under the new managers. That review was precluded due to the lack of a fully-functional educational institution. The team met with administrators; however, the "operation" of the school is so attenuated as to prevent an evaluation of the functioning of the management team. Therefore, the management has not demonstrated an ability to lead and manage the school... The purpose of the on-site evaluation is also to evaluate the adequacy of the new location for operation of the school. Again, the team was, in effect, only able to view a non-functioning facility. In the absence of students, the school has not demonstrated the adequacy of the facilities and instructional materials...*

*The on-site evaluation team found that the school has undergone dramatic changes since the last on-site evaluation in October 2014. The previous ownership decided to cease enrolling students in June 2015 pending a change of ownership, which occurred in October 2015. The new owners have not yet enrolled any students and have not delivered education since acquiring the school. Nearly a year without students has resulted in severely attenuated school operations that led the team to question whether the school has maintained eligibility for ACCSC accreditation.*

### **August 2016 Review and Action**

The Commission has determined that JEM College failed to demonstrate that the school operated – providing education and training to students in accordance with its primary objectives – on a continuous basis (*Section I (E)(2)(b), Rules of Process and Procedure, Standards of Accreditation*). As stated in the Commission's requirement, at issue is whether JEM College has demonstrated "continuous operation" as

defined in the *Standards of Accreditation*, i.e., training students at a school. The school ceased enrolling students at some point prior to June 30, 2015, such that there were no active students as of June 30, 2015 (from the school's 2015 Annual Report). Although ACCSC was aware the previous owner intended to cease enrollment of new students while the change of ownership was being finalized, the school did not make clear that the current students would graduate before enrollments resumed or that new owners would not immediately resume enrolling new students after the transaction. It was not until Sahar Andisha's message to Juanita Gurubatham on November 13, 2015 regarding an imminent change of location that it became clear that there were no current students. At that point, ACCSC raised the question with regard to the school's compliance with eligibility criteria requiring continuous operation.

JEM College submitted a waiver of the standard requiring continuous operation in order to maintain eligibility for ACCSC accreditation, for the time period June 2015 through the date of the ownership transaction, October 15, 2015. The request includes the following statement: "JEM College intends to narrow the scope of this accreditation policy to a temporary hold on the enrollment of new students until the change of ownership is complete, no later than November 30, 2015. Once the change of ownership is finalized, JEM College will resume full scale operations of the school."<sup>1</sup> The response includes copies of telephone bills, electricity bills, and visitor sign-in sheets from June 2015 through October 2015, and copies of telephone messages from June 2015 through November 2015. Upon review of the waiver and additional information provided, the Commission deemed the school to be in operation as described by the school, for the period June 2015 through November 30, 2015.

*JEM College's stated position that the former owner elected not to enroll new students during the recent change of ownership process due to concerns that if the change of ownership was not consummated, the school would not be financially sound enough to meet obligations for those new students through the completion of the program. In addition, the new ownership found that the school had to obtain final approval from the California Department of Public Health ("CDPH") for the issuance of a new school identification number and approval of the clinical locations before enrolling new students. Moreover, the school's response states that although JEM College was not actively enrolling students, the school was open to support the needs of former students including employment assistance, tutoring for the state exam, and assistance to fulfill eligibility requirements for obtaining state licensure.*

JEM College received approval from CDPH on February 8, 2016 and on March 25, 2016 the school submitted the Application for a Change of Location-Part II, reporting two current students. The on-site evaluation to review the Change of Ownership, as well as the Change of Location, was scheduled for April 14, 2016 – as required in order to accomplish the review within six months of the October 15, 2015 change of ownership transaction.<sup>2</sup> According to the May 16, 2016 TSR, "[i]n preparation for the on-site evaluation, JEM informed the Commission representative that there would be three active students as of April 14, 2016... upon arrival, the school informed the team that the start date for the three students had been moved to April 25, 2016." Although the school tried to make the argument that the three students were "enrolled" at the time of the March 25, 2016 application submission but had yet to start classes, the on-site evaluation team found that the enrollment agreements for the potential students had been signed on March 26, 2016, March 31, 2016, and April 2, 2016, after the Application for a Change of Location-Part II had been signed by Mr. Amir Baniassad on March 25, 2016.

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<sup>1</sup> Although the statement refers to the "change of ownership," it is presumed to refer to the proposed change of location.

<sup>2</sup> An on-site evaluation of the school will be conducted within six months of the date that the ownership change occurred (*Section IV (E)(2)(o)(ii), Rules of Process and Procedure, Standards of Accreditation*).

In response to the on-site evaluation team's finding,

- JEM College attempted to show that the school is “open and operating” through activities with former students and potential applicants. The response includes e-mails from 5 graduates indicating they have called the school with questions and one e-mail pertaining to an externship site. The Commission was not persuaded that these activities constitute a school that is providing education and training on a continuous basis.
- JEM College argued that ACCSC staff advised the school against enrolling new students during the period that the school's eligibility for accreditation was under review. Although that would be a prudent precaution given the nature of the Commission's review at the time, it has no bearing on the rest of the time period of non-enrollment in question, most importantly the period after the school obtained licensure from CDPH on February 8, 2016.
- With regard to the question of the two students reported as currently enrolled on the Application for a Change of Location-Part II, the response indicates that “Ms. Andisha explained that the 2 students indicated on the Application for Change of Location-Part II were students that had enrolled in JEM College's first class following the Change of Ownership, but had subsequently cancelled their enrollments.” The response, however, does not include documentation to this effect, such as completed enrollment agreements or copies of student correspondence regarding cancellation of the enrollment.
- With regard to the purported April 11, 2016 start that was subsequently postponed, JEM College stated,

*It is not unusual for a class start to be postponed a few weeks to enroll additional students. All of JEM College's enrolled students were notified of the change to the start dates and all approved the change. JEM College indicates on its Enrollment Agreement, and all students were aware, that the school reserves the right to change start dates when it deems necessary. When the class started on April 25, 2016, it had 5 students...*

The response, however, does not include any documentation to support the statement that five students started class. The school submitted no documentation (no enrollment agreements, grades, attendance rosters) to show that in fact the school is now training students. Therefore the Commission found that JEM College had not demonstrated there are students enrolled and receiving training and education at the school currently.

Compounding the issue of continuous operation is the question as to the actual location of the institution from December 19, 2015 to March 2016. The Application for a Change of Location-Part I indicates that the last scheduled date at the previous location was December 20, 2015 and that the date classes were scheduled to resume as February 1, 2016. On March 25, 2016, JEM College submitted the Application for a Change of Location-Part II, reporting the date the school ceased operation to move as March 1, 2016 and the date that the school resumed operation as March 10, 2016. During the on-site evaluation, school officials gave conflicting information with regard to the sequence of events during the change of location. In response, the school stated, “[o]n December 19, 2015, JEM College was moved to the new location on Pierce Street. Our X-Ray Lab equipment and student files were moved to a storage facility pending construction of an X-Ray Lab and a secure file room to hold student files.” The Commission found that the response shows that the school did not have a physical location as of December 20, 2015 and the Commission was not persuaded that JEM College resumed “operations” training students on March 10, 2016 by moving equipment into the new location.

Based on the foregoing, the Commission determined that JEM College did not meet the burden of demonstrating continuous operation as defined by accrediting standards, which is “training students at a school” It has been established that there were no students in training at JEM College from June 2015 through April 14, 2016. The Commission allowed the demonstration of service to graduates as a proxy for ongoing operation from June 2015 to November 30, 2015 due to the CDPH licensure issue. The Commission acknowledged that the school’s extending the moratorium on enrolling new students as a prudent precaution during the period that the school’s eligibility for accreditation was under review from December 1, 2015 through February 5, 2016. Given that the school reported that classes were to “resume” on February 1, 2016 and the school received approval from CDPH on February 8, 2016, it was expected that the school would be resuming operations; training students. The Commission believed this expectation was met when the school submitted an Application for a Change of Location-Part II in March 2016 indicating that the current number of students to be two. On April 14, 2016, an ACCSC on-site evaluation team found that the expectation of resumed school operations had not been met and the school was in fact not training students. Although JEM College now claims to have started training students as of April 25, 2016, the school did not submit any documentation to support this, and the school has failed to demonstrate that the school trained any students since February 8, 2016 and as such the Commission found that the school has not maintained eligibility for ACCSC accreditation.

### **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 (1)(F)(1)(c) Rules of Process and Procedure, Standards of Accreditation* the Commission requires that JEM College submit a completed *ACCSC Institutional Teach-Out Plan Approval Form*,<sup>3</sup> to demonstrate how, in the face of possible consequences of the withdrawal of accreditation, JEM College will ensure the opportunity for students to complete their program of study either by JEM College or through an agreement with another accredited institution(s) approved to offer a program comparative to JEM College’s programs. The school Teach-Out Plan should be submitted **on or before September 22, 2016.**

### **APPEAL AND REAPPLICATION PROCESS AND PROCEDURE**

JEM College may opt to appeal the Commission’s decision to revoke accreditation or 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 JEM 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 September 19, 2016.**
- If JEM 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 October 11, 2016.**
- If JEM elects not to appeal this decision, the Commission’s decision will become final effective **September 19, 2016.** The school may submit comments **on or before October 11, 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*.

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<sup>3</sup> ACCSC Institutional Teach-Out Plan Approval Form: <http://www.accsc.org/Content/FormsAndReports/FormsAndReports.asp>

- If JEM College elects not to appeal this decision, the school may reapply for accreditation after a period of nine months (*Section VII (P)(4), Rules of Process and Procedure, Standards of Accreditation*). This means that the school may not submit an Application for Initial Accreditation until **June 19, 2017**. The school will be required to adhere to all applicable application processes set forth in the Commission’s Rules of Process and Procedure.

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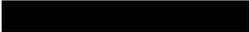
Should you have any questions regarding the Commission’s decision, please contact me directly at 703.247.4520 or mcomis@accsc.org.

Sincerely,



Michale S. McComis, Ed.D.  
Executive Director

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

c: Sahar Andisha  




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## LETTER OF INTENT TO APPEAL A COMMISSION DECISION

### To Be Submitted No Later Than September 19, 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 JEM College located in Corona, California intends to appeal the recent decision of the Commission to withdraw the school's accreditation. 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 if financial soundness was one of the grounds for the Commission's decision.

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 October 11, 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

<b>Panel Member</b>	<b>Affiliation</b>	<b>Term Ending</b>
Gary Baker	<b>U.S. Department of Education (Retired)</b> Springfield, Virginia <i>Public Member</i>	2019
Paul Bott, Ed.D.	<b>Pacific College</b> Costa Mesa, California <i>Public Member</i>	2020
Nancy Bradley	<b>Daytona College</b> Ormond Beach, Florida <i>School Member</i>	2016
Mary Cano	<b>Western Technical College</b> El Paso, Texas <i>School Member</i>	2018
Paul Fitzgerald	<b>Erie Institute of Technology</b> Erie, Pennsylvania <i>School Member</i>	2019
Lorne P. Gauthier	<b>Northwest Technological Institute</b> Southfield, Michigan <i>School Member</i>	2017
William James	<b>U.S. Department of Education (Retired)</b> Fairfax, Virginia <i>Public Member</i>	2019
Timothy McMahon	<b>Triangle Tech</b> Pittsburgh, Pennsylvania <i>School Member</i>	2020
Cedric D. Page, Ph.D.	<b>University of New Mexico – Los Alamos</b> Los Alamos, New Mexico <i>Public Member</i>	2019
Kathleen J. Steinberg	<b>Midwest Technical Institute</b> Lincoln, Illinois <i>School Member</i>	2018
Raymond Tuttle, Ph.D.	<b>University of Mary Washington</b> Fredericksburg, Virginia <i>Public Member</i>	2020



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# **PUBLIC COMMENT DISCLOSURE FORM**

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**To Be Submitted No Later Than October 11, 2016.**

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

RE: JEM College  
271 Ott Street, Ste. 23  
Corona, California 92882-7104

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 JEM College’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 reasons for 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 October 11, 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