



Accrediting Commission of Career Schools and Colleges

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January 16, 2018

ELECTRONIC DELIVERY

████████████████████
Director
D'Mart Institute
Centro Comercial San Cristobal
Barranquitas, Puerto Rico 00794

School #M064778
Warning

Dear ██████████

At the August 2017 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation submitted by D’Mart Institute located in Barranquitas, Puerto Rico. Upon review of the March 9, 2017 deferral letter and the school’s response, the Commission voted to place D’Mart Institute on **Warning** with a subsequent review scheduled for ACCSC’s August 2018 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commission’s Review

August 2016

At the August 2016 meeting, the Commission considered D’Mart Institute’s Application for Renewal of Accreditation. Upon review of the June 10, 2016 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to defer action on D’Mart Institute’s Application for Renewal of Accreditation until the February 2017 meeting in order to provide the school with additional opportunity to demonstrate compliance with accrediting standards. The Commission’s September 13, 2016 letter directed the school to demonstrate compliance with accrediting standards in the areas of student achievement outcomes; independent third party verification; catalog disclosures; attendance policy; refund policy; admissions documentation; instructional materials; and graduation and employment rate disclosures.

February 2017

At the February 2017 meeting, the Commission found that D’Mart Institute did not make significant progress towards demonstrating compliance with accrediting standards that would formulate the basis of an accreditation decision. In addition, the Commission noted in the school’s accreditation history that the attendance and refund policies, instructional materials, disclosure of graduation and employment rates, and employment records were questioned during the most recent accreditation process. In addition, the Commission considered D’Mart Institute’s response to the March 9, 2016 Outcomes Report and voted to provide the school with an additional opportunity to demonstrate compliance in the area of licensure rates. The Commission advised the school that failure to make a demonstration of compliance with accrediting standards would raise significant questions with regard to the school’s ability to manage a postsecondary school in compliance with ACCSC’s *Standards of Accreditation*.

August 2017

At the August 2017 meeting, the Commission found that despite three opportunities to demonstrate compliance, D’Mart Institute has yet to provide sufficient documentation in the six areas listed below. The Commission’s consideration of the entire record pertaining to the school’s Application for Renewal

of Accreditation calls into question the school's ability to manage a postsecondary school in compliance with ACCSC *Standards of Accreditation*. In addition, the school's current grant of accreditation was effective going forward from February 2011 for a period of four years and therefore due for renewal as of February 2015. As such, the Commission determined to issue a Warning Order. If D'Mart Institute cannot respond with sufficient documentation to demonstrate the compliance with accrediting standards in the areas outlined below, the Commission will consider that as evidence that the school's management is unable to successfully manage the school in compliance with standards and will take the appropriate action.

1. D'Mart Institute must demonstrate that the school has adequate management and administrative capacity in place that includes supervision by a team with the demonstrated ability to lead and manage a post-secondary educational institution, providing assurance that the school will operate in compliance with accrediting standards, meet its objectives, and fulfill its obligations to students (*Section I Statement of Purpose & (A)(1)(a), Substantive Standards; Standards of Accreditation*). The Commission found that the school's response fell substantially short of the expectation to demonstrate compliance with accrediting standards, as enumerated throughout the remainder of this letter. Overall, the response indicates a lack of understanding of the school's obligation to demonstrate compliance with accrediting standards. The Commission expects that D'Mart Institute's management team will take this additional opportunity to assess carefully the school's operations in the areas identified below and to provide complete documentation demonstrating compliance with accrediting standards. In developing the response, the Commission advises D'Mart Institute to make use of the ACCSC resources found on the Commission's website, and to seek assistance from ACCSC staff as needed. The effectiveness of the D'Mart Institute management capacity and strategies will be evaluated in part by the school's ability to demonstrate compliance with accrediting standards.¹

In order to afford D'Mart Institute another opportunity to demonstrate that the school has adequate management and administrative capacity, the Commission directs D'Mart Institute to submit the following:

- a. A description of how the school is managed (including campus-based and corporate-based oversight) and how the oversight in place effectively ensures that the school meets its objectives, fulfills its obligations to students, and meets or exceeds accrediting standards on an ongoing basis. The explanation must include a description of the oversight relationship between the main school and its branches;
- b. Two organization charts as follows:
 - i. An organization chart representing the on-site management at the campus level (for each location) and
 - ii. An organization chart representing management at the corporate level, including the position and name of each individual;
- c. A list of all management and administrative staff (including corporate staff as applicable) who have been employed by the school since the last accreditation review in the following format, organized by position;

¹ In determining the adequacy of the school's management, the Commission will consider D'Mart Institute's entire response to the items outlined in this letter as evidence of the school's ability to demonstrate the capacity to manage a post-secondary institution and ongoing compliance with accrediting standards.

Position	Staff Member's Name	FT / PT	Assumed Duties		Date Employment Ceased		Reason Employment Ceased	Number of Years Employed
			Mo	Yr	Mo	Yr		

- d. A copy of job descriptions for each manager and administrative staff member;
 - e. An explanation as to how each individual is qualified to fulfill his/her role with the school;
 - f. An explanation as to how there are a sufficient number of managers at the corporate and campus levels. In particular, the Commission is interested in how D'Mart Institute provides sufficient management and administrative capacity to oversee and maintain quality and consistency of operations; and
 - g. A description of professional development undertaken by the management team to deepen the understanding of the accrediting standards and documentation requirements.
2. D'Mart Institute must demonstrate that the school publishes in its catalog and enforces a policy of acceptable student attendance that promotes sufficient levels of student attendance such that the required knowledge, skills, and competencies can be reasonably achieved (*Section VII (3)(b), Substantive Standards, Standards of Accreditation*). The Commission's review of the school's attendance policy to this point has focused on the lack of clarity with regard to how the school defines "acceptable" attendance, the consequences for failure to meet the definition of acceptable attendance, and at what point D'Mart Institute determines that excessive absenteeism constitutes a withdrawal from the school. As part of the March 9, 2017 deferral letter, the Commission directed D'Mart Institute to revise the school's attendance policy, including four specific elements. The Commission noted the following with regard to the school's response:
- D'Mart Institute stated that the *criteria used to measure attendance* are: "[t]he students are required to attend all the unit [sic] according to their class schedule and stay according to the duration of each unit." From this explanation, it appears that class attendance is used to measure attendance.
 - D'Mart Institute stated the *definition of acceptable and how often attendance is monitored* as follows: [t]he registrar will handle to each professor a student's certification list enrolled at the beginning of each unit, the professor confirms the students present in their classroom, the form will then be return to the registrar for the proper action." The Commission found that this response does not define what the school considers acceptable attendance. Specifically, since the school appears to measure attendance via presence in class, how many classes must the student attend to be considered acceptable attendance?
 - D'Mart Institute stated *the consequences for failure to meet requirements*, as follows: "[i]f the student do not comply with the attendance policy he or her are subject to suspension or termination." The Commission found that this statement does not clearly define the point at which the school takes action to suspend a student and when a student is subject to probation.
 - D'Mart Institute stated *the point at which the school determines that ongoing non-attendance constitutes withdrawal from the school and initiates the refund process*. As follows: "[i]f after the proper follow up by the student affair personnel, the student persist in not continue the program immediately will be refer to the Registrar and Financial Aid Officers to start the withdraw process." Again, the Commission found that the school has not included the specific

timeframe of non-attendance that will result in a determination that the student has withdrawn. This lack of clarity continues to prevent D'Mart Institute from demonstrating compliance with accrediting standards relative to the attendance policy and the timeliness of refunds, as noted in the following finding. The absence of clarity also calls into question whether the school complies with the U.S. Department of Education's ("the Department") requirements that students with 14 days of consecutive absence are terminated and that refunds are made within 45 days of the date a student has been determined to have withdrawn, as noted in the following finding.

In the March 9, 2017 deferral letter, the Commission directed D'Mart Institute to provide examples of attendance documentation to demonstrate the application of the stated attendance policy. As directed, D'Mart Institute provided a roster of all students enrolled at the school from September 1, 2016 to January 31, 2017 and a list of six (6) students that the school indicated, "[s]top attending class, without notified the school." The attendance documentation provided for the six (6) withdrawn students included copies of student schedules, certifications of students enrolled, and copies of grade books. The Commission noted that the student schedules are limited to only providing the date, time, and course information for each student. The certifications ("Course Offering Roster") are lists of students enrolled in a course for faculty use. The grade book lists each student enrolled and their final grade from the course taken within the particular term and makes no reference to the dates in which the student did or did not attend class. The Commission noted that there is a reference to attendance on the grade book forms, however the document indicates only received "credit" for attendance. The aforementioned documentation does not provide the specific dates the student did and did not attend class that resulted in a withdrawn status.

Overall, the Commission found that D'Mart Institute has again failed to demonstrate that the school has an acceptable attendance policy and the documentation provided in the response reflects the lack of clarity in the school's policy.

Based on the foregoing, D'Mart Institute must provide the following:

- a. A complete description of the school's attendance policy that includes, but is not limited to, the following elements:
 - i. The specific criteria for how the school measures attendance;
 - ii. The definition of "acceptable" attendance and how often attendance is monitored;
 - iii. Consequences for failure to meet the requirements of the attendance policy; and
 - iv. The point at which the school determines that ongoing non-attendance constitutes withdrawal from the school and initiates the refund process (please note that this policy must comply with the Department's requirements that students with 14 days of consecutive absence are terminated);
- b. A copy of the school's catalog showing the complete and accurate disclosure of the attendance policy described above;
- c. Documentation that the school has implemented the policy described above, including, but limited to, the following:
 - i. Provide attendance sheets for the six (6) withdrawn students that include the specific dates the students' did not attend class; and
 - ii. A roster of all students enrolled at the school as of July 1, 2017 as follows:

Student Name	Program	Start Date

- iii. Copies of attendance documentation for a sample of ten (10) students from the list above, showing that the school adheres to the published attendance policy; and
 - iv. Copies of documentation of disciplinary action taken with students (from the list above) who fail to meet the attendance criteria, if applicable.
3. D'Mart Institute must demonstrate that the school applies its refund policy as published in the catalog (*Section I (D)(5)(a) (i-iii), Substantive Standards, Standards of Accreditation*). At issue is the way in which the lack of clarity regarding the attendance policy precludes a determination as to the timeliness of refunds and inconsistent information reflected in student records provided to show the application of the refund policy.

In response to the March 9, 2017 deferral letter, D'Mart Institute stated that the school revised its refund policy in accordance with the attendance policy regarding the last date of attendance and date of determination. The Commission compared the current policy with the previous refund policy and found no difference; therefore, it appears the school did not revise the policy. As noted previously, the policy does not establish how the school determines the student has withdrawn when there is no formal notification.

Although D'Mart Institute provided a list of students to whom refunds had been made during the period March 1, 2017 and May 31, 2017, there was no refund documentation regarding these students included in the response. In response to the Commission's findings regard the attendance policy, D'Mart Institute submitted a roster of all students enrolled at the school from September 1, 2016 to January 31, 2017 and identified six students who stopped attending without notifying the school. The school provided documentation of the actions taken with regard to each of the six students, including withdrawal forms and refund documentation. In each case, it appears the school contacted the student and confirmed that the student intended to withdraw, somewhere from 22 to 29 days after the last academic event. That date was then recorded as the date of determination on a document titled "Letter from Student Withdrawal." Since the school actually contacted students and obtained notification of the students' intent to withdraw, it is still unclear how much time may elapse – without communication from the student – before the school determines the student to have withdrawn.

In reviewing the forms titled "Treatment of Title IV Funds When a Student Withdraws from a Credit-Hour Program," the Commission noted that the school is required to report the "last date of attendance at an academically related activity." For Yanelys Santiago Rojas, the school completed the form using an inaccurate date of last academic event (see table below).

Student Name	Last Date of Attendance Based on Last Academic Event (From "Letter From Student Withdrawal Form")	Date of Withdrawal (From Title Iv Refund Form-Step 2 Percentage of Title IV Earned)	Date School Determined Student Withdrew (From Title IV Refund Form)
██████████	██████	██████	██████
██████████	██████	██████	██████
██████████	██████	██████	██████
██████████	██████	██████	██████
██████████	██████	██████	██████

Due to the ongoing lack of clarity of the attendance policy and corresponding lack of clarity in defining the timeframe in which refunds are processed, the Commission determined that additional documentation is necessary to demonstrate that the school processes refunds in an accurate and timely manner. Based on the foregoing, the Commission directs D'Mart Institute to submit the following:

- a. A copy of the school's refund policy that has been revised in accordance with the revised attendance policy with regard to the last date of attendance and date of determination;
 - b. An excerpt from the school's catalog, demonstrating disclosure of the revised policy to students;
 - c. A copy of the school's internal policies and procedures for processing refunds, including an explanation of how the school defines the last date of attendance and the date the school determines the student to have withdrawn;
 - d. An ACCSC Refund Report for all refunds issued to students who were either dismissed or withdrew between July 1, 2017 through September 30, 2017 to include the enclosed ACCSC Refund Report Summary Sheet, Refund Report Worksheet, completed attendance tracking forms to include documentation of approved leaves of absence (as applicable), and copies of all electronic refund transactions and/or checks – front and back – issued for the purpose of student records;
 - e. An explanation for any student for whom a refund was made in excess of the maximum number of days identified in the school's refund policy; and
 - f. Any additional information the school believes will be useful to the Commission in making a determination regarding the school's compliance with accrediting standards regarding the school's refund policy or practices.
4. D'Mart Institute must demonstrate that the instructional materials are sufficiently comprehensive and reflect current occupational knowledge and practice (*Section II (A)(1)(a), Substantive Standards, Standards of Accreditation*). The issue under review is whether the school is providing up-to-date textbooks for the Barbering program. The March 9, 2017 deferral letter noted that while D'Mart Institute provided documentation that the school purchased several barbering-related books, there was no evidence that the addition of the newly-acquired texts was sufficient to ensure the current materials are comprehensive and reflect current occupational knowledge and practice. In response, D'Mart Institute stated that the school has four copies of the program's textbooks at the learning resource center. The response does not identify the four books and does not make clear whether the four books constitute the entirety of the instructional materials available to students in the Barbering program. In addition, D'Mart Institute provided a copy of the Program Advisory Committee ("PAC") meeting minutes demonstrating that the PAC reviewed and commented on the library resources, however the comments lack detailed review and discussion regarding the current books and resources available to Barbering students. Specifically, only one PAC member commented that the facilities of the LRS have sufficient resources in terms of books and references for the students. D'Mart Institute did not demonstrate that PAC specifically reviewed the books and resources, including the textbooks available to Barbering students.

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

- a. A detailed narrative of the instructional materials available to students in the Barbering program, to include lists of specific textbooks;

- b. A narrative regarding how the instructional materials described above are sufficient to serve the current student population; and
 - c. A copy of the PAC meeting minutes demonstrating that the PAC members specifically commented on and discussed in detail the textbooks and resources described above, especially with regard to whether those materials reflect current occupational knowledge and practice.
5. D'Mart Institute must demonstrate that for those programs where a governmental entity requires the attainment of a passing score on a licensure/certification exam to work in a field, the program's licensure/certification exam pass rate is at least 70% (*Section VII (B)(1)(b)(iii), Substantive Standards, Standards of Accreditation*). The March 9, 2017 deferral letter noted that D'Mart Institute identified 31 students in all programs who graduated during 2016 and took the licensure/certification exam and that the results for all 31 students were pending. As directed, the school provided the following update regarding the exam results for all 31 students who graduated in 2016, as well as the overall examination pass rate:

Program	Number of Graduates Who Took the Exam	Number of Graduates Who Passed the Exam	Pass Rate
Electricity with PLC and Renewable Energy	14	3	21%
Pharmacy Technician	3	1	33%
Refrigeration & Air Conditioning w/ PLC and Renewable Energy	4	2	50%
Cosmetology	4	2	50%
Barbering and Styling	3	3	100%
Practical Nursing	1	1	100%
Emergency Technician	2	2	100%
Automotive Mechanics Technician with Fuel Injection	n/a	n/a	n/a

The Commission noted that the pass rates for the Cosmetology program, Electricity with PLC and Renewable Energy program, Refrigeration and Air Conditioning with PLC and Renewable Energy program, and Pharmacy Technician program do not meet ACCSC's required 70% exam pass rate. D'Mart Institute provided a described the strategies being implemented to promote improved pass rates including the implementation of practice exams, additional opportunities for students to review the required skills tested during the exam, and the appointment of a lead teacher who will monitor the new initiatives and ensure that other faculty are supporting the initiatives.

While the Commission recognized that D'Mart Institute has developed initiatives to improve pass rates, the Commission determined that additional information is warranted to ensure that the strategies are successful in improving each programs' exam pass rate to compliance with accrediting standards. Based on the foregoing, the Commission directs the school to provide the following:

- a. The Graduation and Employment Charts submitted with the ACCSC 2017 Annual Report (prepared) using a **July 2017 Report Date** for the Cosmetology program, Electricity with PLC and Renewable Energy program, Refrigeration and Air Conditioning with PLC and Renewable Energy program, and Pharmacy Technician program;
- b. For each Graduation and Employment Chart provide a list of all graduates reported as "Available for Employment" and licensure examination pass rate data, in the following format:

Program Name				
Name of Licensing Agency				
Total Number of Graduates Taking the Exam				
Total Number Graduates Passing the Exam				
Percentage of Graduates Passing the Exam				
DETAIL REPORT				
Graduate Name	Class Start Date	Graduation Date	Took Exam (Y/N)	Passed Exam (Y/N)

- c. For any program for which the reported exam pass rate licensure exam passage do not meet the ACCSC 70% benchmark, an updated assessment of the factors impacting the rates of licensure exam passage, how the strategies implemented by the school are intended to target those factors, and the effectiveness of those strategies; and
 - d. Any additional information that the school believes will be useful to demonstrate the school's compliance with licensure pass rate requirements.
6. D'Mart Institute must demonstrate that the school discloses student graduation and graduate employment rates as last reported to the Commission and that the disclosure for each program's graduation and graduate employment rate must be accurate, not intended to mislead, and includes the program population base and time frame upon which each rate is based. (*Section IV (C)(3), Substantive Standards, Standards of Accreditation*). The March 9, 2017 deferral letter states that the disclosures did not include the population base and timeframe upon which the statement was based and the Commission directed D'Mart Institute to revise the school's website to include the required disclosure of graduation and employment rates. In response, D'Mart Institute provided a copy of graduation and placement data as reported in the 2016 Annual Report; however, the Commission noted that the graduation and placement data is for the branch campus located in Vega Alta rather than the campus in question. Accordingly, the Commission directs D'Mart Institute to revise the disclosure of student graduation and graduate employment rates to reflect those last reported to the Commission on the 2017 Annual Report, as well as the program population base and time frame upon which each rate is based. The school must provide a translated copy to demonstrate that the disclosure of graduation and employment rates complies with accrediting standards.

Application for a New Non-Degree Program:

At the August 2017 meeting, the Commission considered its previous decision to defer action on the Application for a New Non-Degree Program for the Geriatrics Assistant (Diploma) program. Given the pending actions for the Application for Renewal of Accreditation, the Commission voted to again defer final action on the Application for a New Non-Degree program for the Geriatrics Assistant (Diploma) program in conjunction with the decision to place the school on Warning. The Application for a New Non-Degree Program for the Geriatrics Assistant (Diploma) program will again be considered at the August 2018 meeting.

Warning Restrictions:

Pursuant to *Section VII (K)(7), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Notification to Students:

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(7) Rules of Process and Procedure, Standards of Accreditation*).

Response Requirements:

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards.

D'Mart Institute must provide a response to the items expressed above that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.² If the school's response contains documentation that includes personal or confidential student or staff information that is not required for the Commission's review (e.g., social security numbers, dates of birth, etc.), please remove or redact that information.

D'Mart Institute must upload the school's electronic response directly to ACCSC's College 360 Database. The ACCSC College 360 database can be accessed by [clicking here](#). Please note that the password utilized by the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found [here](#). A detailed overview on how to upload a school submission can be found [here](#).

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file name). The school will receive an e-mail confirmation that the file has been received within 24 hours of the submission.

A \$500 processing fee is assessed when a school is placed on Warning. Accordingly, the school will receive an invoice, under separate cover, in the amount of \$500. The school's response must also include a signed certification attesting to the accuracy of the information and be received in the Commission's office **on or before June 29, 2018**.

If a response, the required fee, and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 29, 2018** the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that

² ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

For further assistance or additional information, please contact [REDACTED] or [REDACTED]

Sincerely,



Michale S. McComis, Ed.D.
Executive Director