March 20, 2020

iMed Health Training Center
7441 Marvin D. Love Freeway, Suite 200
Dallas, Texas 75237

Dear [Name]

At the February 2020 meeting, the Accrediting Commission of Career Schools and Colleges ("ACCSC" or "the Commission") considered its previous decision to defer action on the Application for Initial Accreditation submitted by iMed Health Training Center located in Dallas, Texas. Upon review of the Commission’s June 28, 2019 deferral letter and the school’s response, the Commission voted to deny initial accreditation to iMed Health Training Center. The reasons for the Commission’s decision are set forth below.

**History of ACCSC’s Review**

According to the Commission’s records, iMed Health Training Center ("iMed") located in Dallas, Texas:

- Attended the mandatory Accreditation Workshop in order to begin the initial accreditation process on June 8-9, 2015;
- Submitted an Application for Initial Accreditation-Part I in August 2015;
- Re-submitted the Application for Initial Accreditation-Part I in December 2015;
- Submitted an Application for Initial Accreditation-Part II and Initial Self-Evaluation Report in September 2016; and
- Submitted a revised Application for Initial Accreditation-Part II in March 2018.

As stated under Section III (B)(1), Rules of Process and Procedure, Standards of Accreditation, “[u]naccredited applicants for initial accreditation with ACCSC will receive an orientation on-site evaluation conducted by an ACCSC staff person after the initial submission of the Self-Evaluation Report.” ACCSC staff conducted an Orientation On-Site Evaluation to iMed on February 16, 2017 and issued a report from that review on June 9, 2017. Pertinent to the history of this matter, the Orientation Evaluation Report states, inter alia, the following:

> Accrediting standards require that schools must supply the Commission with complete and accurate information and documentation showing the school’s compliance with all accrediting standards if the school is to be granted accreditation (Introduction, Standards of Accreditation). The school’s Self-Evaluation Report does not include any of the exhibits that are referenced in the narrative. Because the exhibits contain critical information such as the Organization Chart; Institutional Assessment and Improvement Planning; Fiscal Budget; Program Advisory Committee activities; Codes of Conduct; and Graduation and Employment Charts, iMed has yet to demonstrate that the school is operating in compliance with accrediting standards. iMed is advised to take particular care in preparing the revised Application for Initial Accreditation and Self-Evaluation Report to ensure the materials are complete, well-organized, bookmarked, or attached in a logical sequence [emphasis added].
As a general observation that applies throughout every section of the SER and is of significant importance, imed is encouraged to provide a far more thorough description of its policies, procedures, and describe in far greater detail how those policies and procedures meet ACCSC standards. It is not enough to simply state that the school is “managed by campus administration” without detailing how this structure effectively ensures that the school meets its objectives and fulfills its obligations to students [emphasis added]. Similarly, it is not enough to simply state that the school “uses institutional strategies, goals, and measurements” without detailing specifically what those strategies, goals, and measurements are or how they are used. This is a general rule that the school should apply when answering each question. Currently, the SER leaves the reader with insufficient information to make critical assessments as to whether imed meets ACCSC’s accreditation standards. The how and the why, the descriptive and explicative, are what the school should devote its energy to in the next version of the SER.

Moreover, the Key Areas of Focus section of the Orientation Evaluation Report includes thirteen (13) compliance elements for the school’s consideration. However, despite being provided with a formal notice regarding the requirements for compliance as outlined in the Standards of Accreditation in the Orientation Evaluation Report, the record in this matter shows that a number of these compliance elements were also findings of non-compliance detailed in the December 13, 2018 Team Summary Report (“TSR”). In particular, the record demonstrates that the following three findings, which are also part of the Commission’s grounds for denying initial accreditation, were first brought to the school’s attention in the June 9, 2017 Orientation Evaluation Report:

• imed did not demonstrate that the school has appropriate written administrative and operational policies and procedures in all areas of the school to which the school adheres, reviews, and updates as needed (Section I (A)(1)(d), Substantive Standards, Standards of Accreditation);

• imed did not demonstrate that advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school, its location, its name, its personnel, its training, its services, or its accredited status (Section IV (B)(1), Substantive Standards, Standards of Accreditation); and

• imed did not demonstrate that the school’s cancellation and refund policies are in compliance with Section I (D), Substantive Standards, Standards of Accreditation.

May 2019 Commission Meeting

At the May 2019 meeting, the Commission considered the Application for Initial Accreditation submitted by imed. Upon review of the December 13, 2018 TSR, which cited 14 Team Findings, and the school’s response to that report, the Commission voted to defer final action on imed’s Application for Initial Accreditation until the February 2020 meeting. The Commission’s decision to defer action directed the school to submit additional information in the following 15 areas required by accrediting standards:

1. imed must demonstrate that the school has a sufficient number of managers and administrative employees necessary to support the school’s operations, student services, and educational programs and that the managers and administrative employees possess the appropriate education, training, and experience commensurate with the level of their responsibilities (Section I (A)(1)(a & c), Substantive Standards of Accreditation).
2. iMed must demonstrate that the school has appropriate administrative and operational policies and procedures to which the school adheres, reviews, and updates as needed (Section I (A)(1)(d), Substantive Standards, Standards of Accreditation).

3. iMed must demonstrate that the school has and applies a fair and equitable refund policy (Section I (D)(5), Substantive Standards, Standards of Accreditation) and that the school’s refund policy includes the time frame within which refunds will be made (Section I (D)(5)(a)(iii), Substantive Standards, Standards of Accreditation).

4. iMed must demonstrate that the school enforces a policy of acceptable student attendance (Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation).

5. iMed must demonstrate that, if an externship is part of the program completion requirements, students may not be considered as graduates or issued a graduation credential until the requirements of the externship have been satisfactorily completed (Section II (A)(8)(f), Substantive Standards, Standards of Accreditation).

6. iMed must demonstrate compliance in the area of student recruitment, as follows:
   - The school did not demonstrate that recruiting personnel are trained and qualified to engage in recruiting activities (Section IV (A)(5), Substantive Standards, Standards of Accreditation).
   - The school did not demonstrate that it has in place policies and procedures and takes reasonable steps to ensure that its personnel do not make false, exaggerated, or misleading statements about the school, its personnel, its training, its services, or its accredited status and to ensure that its personnel do not make explicit or implicit promises of employment or salary prospects to prospective students (Section IV (A)(8), Substantive Standards, Standards of Accreditation).

7. iMed must demonstrate that the school prohibits personnel whose primary responsibilities include recruiting and admissions activities to become involved in admission testing or admission decisions, including signing and accepting the enrollment agreement (Section IV (A)(13) Substantive Standards, Standards of Accreditation).

8. iMed must demonstrate that the school verifies prior work experience of all faculty members and administrators, as required to demonstrate compliance with applicable Standards of Accreditation (Section III (A)(4), Substantive Standards, Standards of Accreditation).

9. iMed must demonstrate that the school remains attentive to students’ educational and other needs (Section VI Statement of Purpose, Standards of Accreditation).

10. iMed must demonstrate that the school maintains an official transcript for all formerly enrolled students (i.e., graduates and terminated or withdrawn students) that includes, at a minimum, the program of study; the date of program entry; the date of graduation, termination or withdrawal; and the clock or credit hours and grades earned (Section IV (B)(2), Substantive Standards, Standards of Accreditation).

11. iMed must demonstrate compliance with Program Advisory Committee (“PAC”) requirements as follows:
   - The school must demonstrate that Program Advisory Committees are comprised of appropriately qualified representatives external to the institution (Section II (A)(6) Substantive Standards, Standards of Accreditation), and that PAC meetings include at least three members in attendance that represent the employment community and/or practitioners from the program area (Section II (A)(6)(a) Substantive Standards, Standards of Accreditation);
• The school must demonstrate that written and detailed minutes of each meeting are maintained that include a description of all members in attendance (i.e., titles and affiliations) (Section II (A)(6)(c), Substantive Standards, Standards of Accreditation); and

• The school must demonstrate that PAC review and comment activities include at least annual review and comment on program length, learning resources, and the adequacy of facilities and equipment (Section II (A)(6)(d)(i), Substantive Standards, Standards of Accreditation).

12. iMed must demonstrate compliance in the area of institutional assessment and improvement planning as follows:

• The school must demonstrate that it engages in ongoing institutional assessment and improvement activities and planning appropriate to the size and scale of the school’s operations and that support the management and administration of the school as well as the quality of education provided (Section I (B)(1), Substantive Standards, Standards of Accreditation) and

• The school must demonstrate institutional assessment and improvement goal setting, benchmarking, and implementation activities appropriate to the size and scale of the school’s operations in the areas of management; fiscal condition and budget; administrative policies and practices; student support services; faculty and staff development; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes (i.e. graduation and employment) (Section I (B)(2), Substantive Standards, Standards of Accreditation).

13. iMed must demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school, its training, or services (Section IV (B)(1), Substantive Standards, Standards of Accreditation).

14. iMed must demonstrate that the school utilizes an enrollment agreement that includes, at a minimum, all required items listed on the ACCSC Enrollment Agreement Checklist and that clearly states the obligations of both the student and school (Section IV (C)(2)(a), Substantive Standards, Standards of Accreditation).

15. iMed must demonstrate that the school publishes a catalog that accurately portrays the school; its educational programs, resources and facilities; and policies and procedures (Section IV (C)(1)(a), Substantive Standards, Standards of Accreditation).

February 2020 Review and Action

Overall, in considering the Application for Initial Accreditation submitted by iMed Health Training Center (iMed), the Commission determined that iMed failed to meet the burden to demonstrate compliance with the Standards of Accreditation in a number of areas and showed a fundamental lack of understanding of the Commission’s standards and requirements. Of note, the December 13, 2018 TSR provides formal notice of the expectations for the school to demonstrate compliance and the June 28, 2019 deferral letter includes specific requirements identifying what iMed should submit in order to demonstrate compliance with accrediting standards. The school, however, failed to provide the specific information as directed by the Commission in response to several of the findings in the June 28, 2019 deferral letter.

According to Section I (F), Rules of Process and Procedure, Standards of Accreditation, “[b]y applying for initial accreditation, a school accepts and agrees to the terms set forth in the ACCSC Application for Accreditation and accepts and agrees that the responsibility rests with the school to demonstrate continuous eligibility for accreditation and compliance with accrediting standards and requirements as set forth in the
Standards of Accreditation.” The Commission considered iMed’s response to the Commission’s June 28, 2019 deferral letter and found that the school failed to meet the burden to demonstrate compliance with the Standards of Accreditation in several areas (Preamble, Section VII (N)(1), Rules of Process and Procedure, Standards of Accreditation) and as such voted to deny initial accreditation to the school for the following grounds:

1. iMed failed to demonstrate that the school has adequate management and administrative capacity that includes a management team with a demonstrated ability to lead and manage an ACCSC-accredited postsecondary institution in compliance with accrediting standards (Section I (A)(1)(a), Substantive Standards of Accreditation).

In response to the on-site evaluation team’s concern that, based on the number of findings and the small size of the school’s management team, iMed did not appear to have a sufficient number of administrative staff to operate the school in compliance with the Standards of Accreditation, the school stated that:

In the past iMed functioned with a small team due to small class sizes. The team was able to support the schools operations, student services and educational programs effectively. The previous Organizational Chart listed [redacted] in several departments due to the fact that [redacted] handled the admin, management and educational aspects of the school.

Currently iMed has reconfigured the Organizational Chart see Exhibit A to delegate the admin, management and educational duties of the school to the various divisions and departments. This will allow for a separation of duties and eliminate conflicts of interest that might arise from one person working in multiple departments. The hierarchy established allows for each department to perform assessments and effectively evaluate the performance. iMed has posted available jobs to recruiting sites and is actively seeking to fill positions.

However, in reviewing the Organizational Chart the Commission found that the school had failed to clearly show which positions the school was “actively seeking to fill” because some positions included a “temp” designation (i.e., Program Coor. Office and Business Affairs Office) while others did not include any personnel listed (i.e., Facilities & Equipment Department and Financial Aid Office). In addition, the Commission noted that the I.T. Office included [redacted] but that no one named [redacted] was listed anywhere else on the organizational chart. Although the school “reconfigured the organizational chart,” it was also unclear to the Commission what some of the job duties referenced. For example, the Program Coor. Office [redacted] listed Career Services while the Admin Office [redacted] listed Graduates.

As such, in the June 28, 2019 deferral letter the Commission notified the school that:

iMed must demonstrate that the school has a sufficient number of managers and administrative employees necessary to support the school’s operations, student services, and educational programs and that the managers and administrative employees possess the appropriate education, training, and experience commensurate with the level of their responsibilities (Section I (A)(1)(a & c), Substantive Standards of Accreditation). Based on the quantity and nature of Team Findings identified by the on-site evaluation team and the number of issues that remain in this Deferral letter, the Commission is concerned with iMed’s leadership and whether the school has the necessary administrative capacity sufficient to ensure operation of the school in compliance with accrediting standards.
Therefore the Commission directed the school to submit information including the following:

- An organization chart listing all management and administrative staff by name and title;
- Completed job descriptions for each position listed on the organization chart;
- Information and documentation, as applicable, to demonstrate how each staff member is qualified for their position; and
- An update on any positions the school is currently actively seeking to fill.

Moreover, in the June 28, 2019 deferral letter the Commission reminded iMed that the burden rests with the school to establish that the school is meeting all requirements of the Standards of Accreditation, that the Commission’s deliberations and decisions are made on the basis of the written record of an accreditation review, and that the school must supply the Commission with complete documentation of its compliance with all accrediting standards and requirements if the school is to be granted accreditation. The Commission directed iMed to provide a thorough and complete response with documentation to each of the 14 other items listed in the deferral letter.

At its February 2020 meeting, the Commission found that iMed’s response to the June 28, 2019 deferral letter is disorganized, largely incoherent, and lacking in narrative responses to explain the exhibits despite the Commission’s prior direction to iMed to ensure the clarity and thoroughness of its response. The Commission found the state of the school’s response to be evidence that the school does not possess adequate administrative capacity needed to operate a postsecondary school in compliance with ACCSC’s Standards of Accreditation.

The Commission noted the following regarding iMed’s response to the June 28, 2019 deferral letter:

a. The response does not include a job description for each position listed in the organization chart, as directed. The response only includes 9 position descriptions and does not include a position description for the following positions: “Finance Department” (held by [Name]), “Faculty Staff” (held by [Name]), and “Admin Office” (held by [Name]). The response does include a position description for “Administrative Faculty” which is not listed on the organization chart.

b. The position descriptions provided in the response list titles that in some cases do not match the organization chart. For example, a job description lists the title of “Management of Externship” and the organization chart lists “Externship Coordinator.”

c. The job descriptions do not appear to align with the job titles listed on them and/or in some cases with areas of school operations relevant to accrediting standards or with other statements made by the school in the response as follows:

i. The job description for the “Recruitment Management” position appears to focus on hiring employees for iMed as it states:

   **Job Goals:**

   *This department will manage recruitment to ensure the organization hire’s [sic] qualified employees to meet the company’s current and future needs.*

   **Essential Duties/Responsibility:**
• Updating current and designing new recruiting procedures
• Supervising the recruiting team and reporting on its performance
• Keeping track of recruiting metrics
• Review recruitment software and suggest the best option for company needs
• Research and choose job advertising options
• Advise hiring managers on interviewing techniques
• Recommend ways to improve our employer brand
• Coordinate with department managers to forecast future hiring needs
• Stay up-to-date on labor legislation and inform recruiters and managers about changes in regulations
• Participate in job fairs and career events
• Build the company's professional network through relationships with HR professionals, colleges and other partners

The school did not provide a job description for personnel responsible for the recruitment of students or admission of students.

ii. The job description for “School Management” does not appear to be a position related to iMed but instead appears to be for a “Principal” position in a school “district,” (i.e., “principal” is not a position at iMed). The job description states in part:

Essential Duties/Responsibility:

• In accordance with the practices and procedures of the District and the school, manages the day to-day operations of the school including, but not limited to, the financial, technical, and clerical and front office support services.
• Assists principal/administrator response to parents and/or community concerns and complaints.
• Manages a variety of school administrative functions for the purpose of enforcing school, District, [sic]
• In coordination with the Principal, maintains a positive, safe learning environment for students.

iii. The response does not provide sufficient information and documentation to demonstrate how each staff member listed on the organization chart is qualified for their position, as directed. Specifically, the response does not include any documentation of qualifications for the following individuals and positions on the organization chart: [Redacted] (position: Finance Department) or [Redacted] (position: IT Department), and only background check information for [Redacted] (positions: School Manager and Recruitment Management).

Based on the foregoing, coupled with the other items in this letter listed below, the Commission found that iMed failed to demonstrate that the school has adequate management and administrative capacity that includes a management team with a demonstrated ability to lead and manage an ACCSC-accredited postsecondary institution in compliance with accrediting standards (Section I (A)(1)(a), Substantive Standards of Accreditation).

2. iMed failed to demonstrate that the school has appropriate administrative policies and procedures necessary for the operation of the school in compliance with accrediting standards (Section I (A)(1)(d), Substantive Standards, Standards of Accreditation). The December 18, 2018 TSR notes that iMed
overall lacked adequately detailed written policies and procedures because although the school catalog and employee handbook contain brief descriptions of operational policies and procedures, the school had not developed an adequate set of written internal operating procedures as needed to ensure the consistent application of policies. Additionally, the on-site evaluation team found that iMed did not demonstrate any established process to review and update policies and procedures.

In response to the December 18, 2018 TSR, iMed stated that:

At the time of the onsite review iMed had a set of Operational Policies and Procedures specific to Faculty and Staff in addition to a Student Handbook. The policies were developed by the school director and the director of education. Reviewing and drafting new policies were initiated on an as needed basis.

Since the onsite review iMed has hired [redacted] to assist with the process of developing a system for reviewing and updating policies and procedures. iMed is now using a systematic approach that incorporates the Strategic Plan see Exhibit B and input from all staff and faculty as outlined in the Policies and Procedures Manual see Exhibit C. The result is a more robust set of Policies and Procedures see Exhibit D.

As stated in the June 28, 2019 deferral letter, in reviewing the submitted Strategic Plan and Policies and Procedures Manual, the Commission found that while the school did implement a process to review and update policies and procedures as necessary, the reference documents continued to lack an adequate set of written internal operating procedures with specifics steps, forms, and tools necessary to ensure the consistent application of policies. In addition, the Policies and Procedures Manual only referenced the following areas:

- Board, Committees & Compliance which focuses on ethics, program advisory committees, and internal governance;
- Business Affairs which focuses on financial stability, accounting policies, and an annual independent audit policy;
- Curriculum which focuses on development and change procedures;
- Staff & Faculty Development which focuses on recruitment, performance evaluation and professional development; and
- Student Services which includes only a single paragraph as follows:

  *iMed is committed to ensuring access for all students, providing a quality education, and maximizing student success. The implements [sic] a variety of student services that accomplish these outcomes, including academic advising, registration, veterans affairs, academic support services, tuition assistance programs, personal counseling, career planning, testing and assessment, as well as a comprehensive array of programs and activities through the office of student and career services.*

In the June 28, 2019 deferral letter, the Commission informed iMed that the intent of appropriate administrative and operational policies and procedures are specific steps, above and beyond what is listed in a catalog or employee handbook, for employees to review and follow to ensure consistent application in all functional areas of the school. As such, in the June 28, 2019 deferral letter, the Commission directed the school to provide information including the school’s updated Policies and Procedures Manual.
At its February 2020 meeting, the Commission reviewed the response to the June 28, 2019 deferral letter which includes the updated iMed Policies and Procedures Manual1 (“P&P Manual”), as directed and noted that in some cases the content of the policies in the P&P Manual does not align with the name/area of the policy; in some cases the policy does not appear to be specific to iMed; in some cases the policies were inconsistent with other information and documentation in the response; or, were already cited by the Commission as problematic and yet remain, as outlined below.

a. In the June 28, 2019 deferral letter, the Commission directed iMed to demonstrate compliance in the area of student recruitment under Section IV (A), Substantive Standards, Standards of Accreditation. Specifically, the Commission directed the school to submit a reference as to where the school’s recruiting policies and procedures are included in the Policies and Procedures Manual as part of the Commission’s findings regarding Section IV (A)(5, 8, &13), Substantive Standards, Standards of Accreditation. Upon review of the response, the Commission noted the following:

i. The school’s response hyperlinks to “Exhibit 27” in the P&P Manual; however, the manual does not include policies and procedures with regard to student recruitment (Section IV Substantive Standards, Standards of Accreditation). “Policy/Procedure Number: D.1.1, Title: Recruitment Policies and Procedures” appears to be policies for hiring employees for the school and placement/employment, not recruitment of students into the school. The manual states, in part (see excerpts below):

The following recruitment policies and procedures apply to all of our recruiting programs, including but not limited to: position postings, internships, on-campus interviews and job fairs. These policies will be reviewed regularly and may be subject to change at the university’s discretion

iMed Health Training Center is a member of the National Association of Colleges and Employers (NACE) and adheres to and promotes its Principles for Professional Practice and fully expects that employers working with our office and utilizing our services will conform to these principles....

Expectations of Employers:

- Provide clear, accurate and up-to-date information in all position postings and dealings with iMed Health Training Center students
- Organizations must have actual or anticipated career related jobs and/or internships for our students and alumni
- All position postings must have full details, verifiable contact information, detailed descriptions and all conditions of employment must be clearly articulated in the posting
- Refrain from any practices that improperly influence and affects job acceptances (i.e. time pressures, encouraging backing out of other offers, exploding offers, etc.)
- Honor all offers made to students and alumni. Withdrawing job offers, both written and oral, violates professional standards and can have a negative professional and financial impact on students.
- All recruiting events and interviews will be kept professional and as such alcohol will not be served.

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1 Additional policies and procedures deemed insufficient are also included as part of other compliance findings listed herein.
• Keep all student information confidential regardless of the source. Sharing student information with another organization is prohibited without the prior written consent of the student.

• Have a fair and equitable recruiting and hiring process that includes timely communication of candidate status and hiring decisions.

Posting of Positions:

All of our full-time jobs and internship positions are posted on our Remind portal which can be accessed at time of enrollment, and also will be giving hand-out in a career center and break room.

Career Fair and On Campus Recruiting Policies

Employers that wish to participate in career fairs and other on campus recruiting opportunities must have open or anticipated part-time/full time professional job and/or medically focused internship opportunities at their organization. Third party recruiting agencies, graduate programs as well as commission only based employers will not be included in on campus recruiting events. Career Services offers on campus recruiting privileges on a first-come, first-serve basis and reserves the right, if space is limited, to select organizations that offer positions that best meet our students’ needs regardless of date.

Prohibited Positions and Practices

While our offices reserve the right to restrict access to services and programs in the best interest of our students and alumni, the following practices, positions and strategies are restricted:

• Employers and individuals offering employment opportunities with compensation packages requiring prospective employees to pay start-up fees, products or services upfront.

• Employers/individuals offering employment/entrepreneurial opportunities based on a “pyramid” or “multi-level” type networking structure requiring/encouraging the recruitment of others who recruit others to sell products and services.

• Campus roles that seek students to sell or market an organization or brand on campus are not considered full-time employment nor an academic internship. Paid opportunities can be posted with Student Employment.

• Placement/Training Agencies or Organizations that provide training with no definitive or guaranteed job offer.

• Use of “exploding offers” that include undue time pressure to accept an offer (such as same day) and/or those that encourage candidates to back out of existing offers.

• Rescinding, deferring or making bad-faith job offers.

ii. In response to the Commission’s directive to provide a narrative for how the school’s policies and procedures take reasonable steps to ensure that personnel do not make false, exaggerated, or misleading statements, instead of a narrative, the response hyperlinks to “Exhibit 27,”\(^2\) which is titled “iMed Health Training Center” and begins by stating:

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\(^2\) Although the school’s response here states “Exhibit 27,” the hyperlink is to a document that is different than the Exhibit 27 mentioned in item (i.) above. Specifically, Exhibit 27 mentioned in item (i.) hyperlinks to a different document titled
The following recruitment policies and procedures apply to all of our recruiting programs, including but not limited to: position postings, internships, on-campus interviews and job fairs. These policies will be reviewed regularly and may be subject to change at the university's discretion. [The exhibit goes on to provide ‘policies’ regarding acceptable/unacceptable employers and careers fairs as in the recruitment policy quoted in item (i.) above]

To further demonstrate the confusing nature of the school’s response, this document includes a signature line signed by someone which looks like a “C” for a first name on the line “Staff Signature” and dated 9-22-19, under the following statement: “By signing below, you agree that you will abide by the terms and conditions of the Recruitment Policies and Procedures:” It is unclear if this is a copy of the school’s policy, some sort of code of conduct,3 or other documentation. iMed failed to provide a narrative as to how the school’s policies and procedures take reasonable steps to ensure that personnel do not make false, exaggerated, or misleading statements.

iii. Although the response includes an Admissions Packet with a script and a list of things not to say to prospective students, the recruitment policy in the P&P Manual does not align with and does not reference the Admission Packet – the recruitment policy in the P&P manual only addresses hiring employees to work at the school. In addition, the response to the Commission’s concerns regarding student recruitment specifically states “[w]e currently do not have any promotional materials, flyers or scripts” which appears to be an incorrect statement since the school provided an admissions script for the Commission’s review.

iv. The response includes a slides presentation titled: “Principles and Procedures for Student Recruiting” (emphasis added). The slides, however, do not provide a cogent illustration of student recruiting procedures and appear to go on and off the topic of student recruitment and focus instead on ways to help students find employment.

- For example, one slide titled “Expand Your Knowledge” appears to provide tips for placing students in employment. This slide states: “Researching the amount of pay and descriptions of the work prior to sending employment options to students” and “Videos are particularly useful on the topic of interviewing skills, where students can watch examples of how to answer questions in a job interview situation.”

- A slide titled “Stay Up to Date” also appears to focus on student employment although it is unclear. For example the slides states “Email and texting students consistently with links to how to improve skills and employment options,” “Work with students to develop skills, such as organization, time management, and effective study habits,” and “Post job ads and source potential candidates on social media groups” (emphasis added).

- The Quiz at the end of the presentation, titled “Principles & Procedures for Student Recruiting Quiz” has three questions, none of which appear to actually address student

3 The response includes five signed “Employee Code[s] of Conduct” in response to the Commission’s directive to submit a Code of Conduct for recruitment personnel. That code of conduct document, however, is not related to student recruitment. Rather it appears to be a general employee code of conduct covering areas such as treatment of company property, treating colleagues with respect, misuse of company equipment, etc.
recruitment or admissions (e.g., “What are three ways to stay up to date with finding students employment?”).

b. The “Policy/Procedure Number: J.1.1, Title: Admission Policy & Procedure” does indicate that “[a]n enrollment becomes official after the signature of both the applicant and the director are contained on the fully executed enrollment agreement and the applicant has satisfactorily completed all admissions procedures” however, the policy does not make clear how the school ensures that that the person responsible for signing and accepting the enrollment agreement is not also involved in student recruitment. This policy also references the Nursing Assistant program which is not part of the school’s application for initial accreditation, stating: “A high school diploma or GED or recognized equivalent is required except for the Nursing Assistant program.” This is exactly the same statement cited in the June 28, 2019 deferral letter as being a misleading statement in the catalog.

c. Some policies and procedures documents provided in the response fail to provide any details or actionable procedures to follow such as:

- In the June 28, 2019 deferral letter, the Commission directed iMed to submit a reference as to where the school’s policies and procedures for verifying prior work experience of faculty members and administrators are included in the Policies and Procedures Manual. The school’s response to the Commission’s concern begins by hyperlinking to an employee code of conduct which is unrelated to this subject. The response also includes “Policy/Procedure Number: H.3.1, Title: Criminal History Background” which indicates in summary that “[a]ll jobs [sic] offers are conditional upon successful completion and approval of the criminal history background check and at least 3 job references has [sic] been verified. A criminal history background check is required of every candidate for hire.” The response includes “Policy/Procedure Number: H.4.1, Title: Qualification to Hire” which indicates that “[r]equirements for hire include verification of a satisfactory: employment record check; criminal record check; and, pre-employment results...”; however, there appears to be no school P&P indicating how the school verifies the prior work experience of faculty members and administrators as required by accrediting standards. The response also includes employee resumes, transcripts, application and “Policy/Procedure Number: D.3.1, Title: References and Background Investigations Procedure,” which also fail to demonstrate how the school verifies the prior work experience of faculty members and administrators as required by accrediting standards.

- The school submitted the same single paragraph policy for Student Services that the Commission previously cited in the June 28, 2019 deferral letter, with the exception of fixing

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4 In the June 28, 2019 deferral letter the Commission directed the school to demonstrate that the person responsible for signing and accepting the enrollment agreement is not also involved in student recruitment (Section IV (A)(13) Substantive Standards, Standards of Accreditation) and directed iMed to submit a reference as to where the school’s recruiting and admissions policies and procedures are included in the P&P Manual. The response again points to the “Policy/Procedure Number: D.1.1, Title: Recruitment Policies and Procedures,” which appears to be policies for hiring employees for the school and placement/employment of students. That policy does not demonstrate that the person responsible for signing and accepting the enrollment agreement is not also involved in student recruitment. The responses goes on to provide an admissions policy (see item (b.) above, and while that policy does not expressly state that recruitment and admissions personnel cannot sign the enrollment agreement, it does indicate that the director signs the enrollment agreement to make it official. The school’s response simply fails to demonstrate clearly how the school ensures that that the person responsible for signing and accepting the enrollment agreement is not also involved in student recruitment.
a typographical error. The “Policy/Procedure Number: E.1.1, Title: Student Services Policy” still states:

iMed is committed to ensuring access for all students, providing a quality education, and maximizing student success. We implement a variety of student services that accomplish these outcomes, including academic advising, registration, veterans affairs, academic support services, tuition assistance programs, personal counseling, career planning, testing and assessment, as well as a comprehensive array of programs and activities through the office of student and career services.

The Commission found that this Student Services Policy still does not provide any details or actionable procedures to follow.

d. In some cases the policies do not appear to be specific to iMed Health Training Center as follows:

- In the June 28, 2019 deferral letter, the Commission raised concerns regarding iMed’s catalog and directed the school to submit a reference as to where the school’s catalog policies and procedures are found in the P&P Manual. In response, the school submitted the “Policy/Procedure Number: C.2.1, Title: School Catalog Policy & Procedure” that states:

  Course offerings may be changed during a student’s education. If a course required under a previous catalog is no longer offered, a student eligible to graduate according to that catalog should consult his or her academic advisor or Dean to identify another course that may be used to fulfill the requirement. Course substitutions in the degree program are permitted only with approval of the Dean through the department head or program director.

  Students who have been gone from the institution for seven years or more must enter the University under the catalog in effect at the time of re-entry. (emphasis added)

The Commission noted that the above policy does not appear to be specific to iMed as it refers to “degrees” rather than the single diploma program offered at iMed, and references the school as a “University.”

- The P&P Manual includes “Policy/Procedure Number: H.6.1, Title: Employee Complaints” which does not appear to be specific to iMed as it references school positions that are not on the school’s organization chart. In addition, the policy references a “formal process described in the procedure in this Manuel [sic]” which the Commission could not find:

  The Career center encourages fair, efficient, and equitable solutions for problems arising out of the employment relationship. The Career Center encourages informal resolution of employee concerns and complaints whenever possible. In the event an employee’s complaint is not resolved informally, the employee may initiate the formal process described in the procedure in this Manuel [sic]. The Human Resources department shall maintain a formal grievance procedure, which includes mediation, to resolve employment disputes....

  In this procedure “Human Resources” means the Associate Vice Chancellor for Human Resources or designee, or the Employment/Employee Relations Manager (“E/ER Manager”) or designee, unless otherwise specified (emphasis added).

Based on the foregoing, the Commission found that iMed failed to demonstrate that the school has appropriate administrative and operational policies and procedures necessary for the operation of a
school in compliance with accrediting standards (*Section I (A)(1)(d), Substantive Standards, Standards of Accreditation*).

3. iMed failed to demonstrate that the school has and applies a fair and equitable refund policy (*Section I (D)(5), Substantive Standards, Standards of Accreditation*); that the school’s refund policy includes the time frame within which refunds will be made; and that the refund policy is disclosed consistently and not in conflict in the catalog and enrollment agreement (*Section I (D)(6), Substantive Standards, Standards of Accreditation*). (*Section I (D)(5)(a)(iii) & (D)(6), Substantive Standards, Standards of Accreditation*).

Per the December 18, 2018 TSR, the school’s refund policy at the time of the on-site evaluation as published in the catalog and enrollment agreement stated that “refund computation will be based on scheduled course time of class attendance though the last date of attendance,” and indicated that students will receive a pro-rata refund if withdrawal/termination occurs within the first 75% of a payment period. The December 18, 2018 TSR also stated that iMed did not appear to follow the published refund policy as the school applied refund calculations applicable to Workforce Innovation and Opportunity Act (“WIOA”) funding requirements, which were not disclosed in the catalog or enrollment agreement and do not align with the published refund policy.

iMed indicated to the on-site evaluation team that because WIOA allows the school to keep all funds drawn down for the current payment period rather than issuing a pro rata refund, the school had not issued a refund to any student that had withdrawn or been terminated. The on-site evaluation team noted that the refund policy described in the school’s catalog and enrollment agreement established a time frame for issuing refunds to students who are called to active military service, but that the policy did not specify the time frame for refund payments applicable to any other non-military case of withdrawal or termination.

In response to the December 18, 2018 TSR, iMed stated that the school’s policy is “a direct reflection of the Texas Workforce Commission’s Cancellation and Refund Policy see Exhibit F “CSC-023R” and that “[o]ur process consisted of completing a Refund Worksheet see Exhibit G “CSC-1040R” detailing the amount if any to be refunded…[i]n all cases there was no refund due.” The Commission found the school’s response to be unclear for students who are not entitled to a full refund or not called to active military service and stated as much in the June 28, 2019 deferral letter. Additionally, the Commission found that because the timeframe for the payment of refunds – within 60 days after the effective date of termination – was listed in the catalog after the “Refund Policy for Students Called to Active Military Service” policy, it remained unclear whether that timeframe was specific to students called to active military service or if the timeframe applied to all withdrawn/terminated students.

Further, in comparing the updated catalog with the updated enrollment agreement, the Commission found that the refund policy did not appear to be consistently stated between the enrollment agreement and the catalog. Specifically, the catalog indicated that the school would not keep more than “$100 in any administrative fees charged” after the expiration of the 72 hour cancellation privilege while the Enrollment Agreement referred to “not more than $50.00 in nonrefundable administrative fees” after the expiration of the 72-hour cancellation privilege.

In the June 28, 2019 deferral letter, the Commission reminded iMed that the refund policy must be disclosed consistently in the catalog and enrollment agreement and the language in the catalog and the enrollment agreement shall not be in conflict (*Section I (D)(6), Substantive Standards, Standards of
Accreditation). Based on the foregoing, the June 28, 2019 deferral letter directed iMed to provide additional information including the following:

- A reference as to where the refund policies and procedures are included in the school’s Policies and Procedures Manual;
- The school’s refund policy as published in the catalog;
- A copy of the school’s refund policy as published on the enrollment agreement;
- Clarification on whether refunds will be processed within 60 days after the effective date of termination for all students or only those students who are called to active military service; and
- A list of all personnel who process refunds along with documentation of their training on the refund policy.

Upon review of iMed’s response to the June 28, 2019 deferral letter, the Commission found the following:

a. In response to the Commission’s directive to provide a reference as to where the refund policies and procedures are included in the school’s P&P Manual, the response hyperlinks to “Policy/Procedure Number: H.1.1, Title: Cancellation & Refund Policy.” The Commission found that the policy still does not include (1) a timeframe for payment of refunds for non-military students or (2) a policy for partial refunds for non-military students – only students called to active service. The P&P Manual states the following:

   A student who withdraws for a reason unrelated to the student’s academic status after the 75 percent completion mark and requests a grade at the time of withdrawal shall be given a grade of "incomplete" and permitted to re-enroll in the course or program during the 12-month period following the date the student withdrew without payment of additional tuition for that portion of the course or program.

   A full refund of all tuition and fees is due and refundable in each of the following cases:

   a) An enrollee is not accepted by the school;
   b) If the course of instruction is discontinued by the school and this prevents the student from completing the course; or
   c) If the student’s enrollment was procured as a result of any misrepresentation in advertising, promotional materials of the school, or representation by the owner or representative of the school

   A full or partial refund may also be due in other circumstances of the program deficiencies or violations of requirements for career schools and colleges.

REFUND POLICY FOR STUDENTS CALLED TO ACTIVE MILITARY SERVICE

A Student of the school who withdraws from the school as a result of the student being called to active duty in a military service of the United States or the Texas National Guard may elect one of the following options for each program in which the student is enrolled:

a) If tuition and fee are collected in advance of the withdrawal, a pro rata refund of any tuition, fees, or other charges paid by the student for the program and a cancellation of any unpaid tuition, fees, or other charges owed by the student for the portion of the program the student does not complete following withdrawal;
b) A Grade of incomplete with the designation "withdrawn-military" for the courses in the program, other than courses for which the student has previously received a grade on the student’s transcript, and the right to re-enroll in the program, or a substantially equivalent program if that program is no longer available, not later than the first anniversary of the date the student is discharged from active military duty without payment of additional tuition, fees, or other charges for the program other than any previously unpaid balance of the original tuition, fees, and charges for books for the program; or

c) The assignment of an appropriate final grade or credit for the courses in the program, but only if the instructor or instructors of the program determine that the student has:
   1) Satisfactorily completed at least 90 percent of the required coursework for the program; and
   2) Demonstrated sufficient mastery of the program material to receive credit for completing the program

The payment of refunds will be totally completed such that the refund instrument has been negotiated or credited into the proper account(s), within 60 days after the effective date of termination only for students called for active military service (emphasis added).

b. The refund policy in the enrollment agreement and catalog does not align with the internal P&P cited above as it does provide a provision for a partial refunds indicating that the school refunds a “prorated” portion of the tuition. The refund policy in the enrollment agreement and catalog, states the following:

   The minimum refund of the remaining tuition and fees will be prorated portion of tuition, fees, and other charges that the number of hours remaining in the portion of the course or program for which the student has been charged after the effective date of termination bears to the total number of hours in the portion of the course or program for which the student has been charged, except that a student may not collect a refund if the student has completed 75 percent or more of the total number of hours in the portion of the program for which the student has been charged on the effective date of termination.

c. The refund policy in the catalog and enrollment agreement does not provide the timeframe within which refunds will be paid other than for students called to active military. iMed did not submit any narrative or other information to clarify whether refunds will be processed within 60 days after the effective date of termination for all students or only those students who are called to active military service, as directed.

d. In comparing the updated catalog with the updated enrollment agreement, the refund policy does not appear to be consistently stated between these documents as follows:

   • The catalog states “[i]f the tuition and fees are collected in advance of entrance, and if after expiration of the 72-hour cancellation privilege the student does not enter school, not more than $100.00 in nonrefundable administrative fees shall be retained by the school for the entire residence program” (emphasis added).

   • The Enrollment Agreement states [i]f the tuition and fees are collected in advance of entrance, and if after expiration of the 72-hour cancellation privilege the student does not enter school, not more than $50.00 in nonrefundable administrative fees shall be retained by the school for the entire residence program (emphasis added).”
The Commission found this discrepancy remained despite the Commission identifying this issue in the June 28, 2019 deferral letter.

Based on the foregoing, the Commission found that iMed failed to demonstrate that the school has and applies a fair and equitable refund policy (Section I (D)(5), Substantive Standards, Standards of Accreditation); that the school’s refund policy includes the time frame within which refunds will be made; and that the refund policy is disclosed consistently and not in conflict in the catalog and enrollment agreement (Section I (D)(5)(a)(iii) & (D)(6), Substantive Standards, Standards of Accreditation).

4. iMed failed to demonstrate that the school enforces a policy of acceptable student attendance (Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation). The on-site evaluation team found that although iMed’s school catalog described a student attendance policy, the school did not accurately apply and enforce the policy. Specifically, the team observed that by 11:30 a.m., five students had already “signed out” on the attendance sheet indicating a departure time of 1:50 p.m., prematurely attesting to the accuracy of hours they had not yet attended and that numerous student files sampled contained attendance records with incorrect calculations of hours attended. In addition, graduate files sampled during the review included externship time sheets that frequently appeared to contain arithmetic errors in calculating hours attended and in several cases, the on-site externship supervisor did not sign the student’s time sheet to verify the accuracy of the hours reported.

In response to the December 13, 2018 TSR, iMed stated that the school “implemented a new electronic Sign-in/Sign-out feature” and provided “a report generated by utilizing the feature” and “a screenshot of calculated hours.” However, the school did not provide a clear policy and procedure for utilizing the electronic Sign-in/Sign-out feature with details such as whether the student or the faculty member completes the information; whether the information is gathered through an online portal or manually entered; and how the school ensures students no longer prematurely attest to the accuracy of hours that are not yet completed. In addition, in reviewing the screenshot of hours, the Commission found a single student with a “Total Hours” of 80 while all other students had a “Total Hours” of zero (0) with no explanation. Additionally, the school stated that “[i]n the future, we plan to assess the use of the electronic timesheet system and find better ways to streamline the process of tracking hours.”

Therefore, the Commission’s June 28, 2019 deferral letter directed iMed to submit information including the following:

- The school’s attendance policies and procedures as found in the Policies and Procedures Manual;
- The school’s attendance policy as found in the catalog;
- A list of all personnel who monitor attendance along with documentation of their training on the updated attendance policy;
- Documentation to demonstrate students have been notified of the change to the attendance policy; and
- Attendance records for the week of October 28, 2019 through November 1, 2019.
In response to the Commission’s June 28, 2019 deferral letter, iMed submitted a copy of the attendance policy as found in the catalog and an identical policy identified as the P&P. The Commission found that these policies do not reference the utilization of the electronic Sign-in/Sign-out feature.

Additionally, in response to the request for attendance records for the week of October 28, 2019 to November 1, 2019, iMed provided a document titled “Date Range Report 10/01/2019 – 12/18/2019” with the following information:

<table>
<thead>
<tr>
<th>Student</th>
<th>Grade</th>
<th>Sign-in</th>
<th>Sign-out</th>
<th>Attendance</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Medical Billing &amp; Coding</td>
<td>10/07/2019 – 12:00 a.m.</td>
<td>10/07/2019 – 12:00 a.m.</td>
<td>16 hours 10/07/19 – 10/10/19</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10/14/2019 – 12:00 a.m.</td>
<td>10/14/2019 – 12:00 a.m.</td>
<td>12 hours 10/14/19 – 10/17/19</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10/21/2019 – 12:00 a.m.</td>
<td>10/21/2019 – 12:00 a.m.</td>
<td>12 hours 10/21/19 – 10/24/19</td>
</tr>
<tr>
<td></td>
<td></td>
<td>10/28/2019 – 12:00 a.m.</td>
<td>10/28/2019 – 12:00 a.m.</td>
<td>8 hours 10/28/19 – 10/31/19</td>
</tr>
</tbody>
</table>

| Medical Billing & Coding | 10/07/2019 – 12:00 a.m. | 10/07/2019 – 12:00 a.m. | 23 hours 33 minutes 10/07/19 – 10/10/19 |
| Medical Billing & Coding | 10/14/2019 – 12:00 a.m. | 10/14/2019 – 12:00 a.m. | 11 hours 66 minutes 10/14/19 – 10/17/19 |
| Medical Billing & Coding | 10/21/2019 – 12:00 a.m. | 10/21/2019 – 12:00 a.m. | 11 hours 66 minutes 10/21/19 – 10/24/19 |
| Medical Billing & Coding | 10/28/2019 – 12:00 a.m. | 10/28/2019 – 12:00 a.m. | 17 hours 30 minutes 10/28/19 – 10/31/19 |

| Medical Billing & Coding | 10/07/2019 – 12:00 a.m. | 10/07/2019 – 12:00 a.m. | 23 hours 33 minutes 10/07/19 – 10/10/19 |
| Medical Billing & Coding | 10/14/2019 – 12:00 a.m. | 10/14/2019 – 12:00 a.m. | 23 hours 33 minutes 10/14/19 – 10/14/19 |
| Medical Billing & Coding | 10/21/2019 – 12:00 a.m. | 10/21/2019 – 12:00 a.m. | 23 hours 33 minutes 10/21/19 – 10/21/19 |
| Medical Billing & Coding | 10/07/2019 – 12:00 a.m. | 10/07/2019 – 12:00 a.m. | 11 hours 66 minutes 10/07/19 – 10/10/19 |

| Medical Billing & Coding | 10/07/2019 – 12:00 a.m. | 10/07/2019 – 12:00 a.m. | 17 hours 30 minutes 10/07/19 – 10/10/19 |
| Medical Billing & Coding | 10/14/2019 – 12:00 a.m. | 10/14/2019 – 12:00 a.m. | 17 hours 30 minutes 10/14/19 – 10/17/19 |
| Medical Billing & Coding | 10/21/2019 – 12:00 a.m. | 10/21/2019 – 12:00 a.m. | 17 hours 30 minutes 10/21/19 – 10/24/19 |
| Medical Billing & Coding | 10/28/2019 – 12:00 a.m. | 10/28/2019 – 12:00 a.m. | 5 hours 50 minutes 10/28/19 – 10/31/19 |
| Medical Billing & Coding | 10/07/2019 – 12:00 a.m. | 10/07/2019 – 12:00 a.m. | 8 hours 10/07/19 – 10/10/19 |
Based on the day schedule listed in the catalog of 8:00 a.m. to 1:50 p.m. Monday to Thursday or evening schedule of 6:00 p.m. to 9:50 p.m. Monday to Thursday, each day student would attend 23 hours and 20 minutes per week and each evening student would attend 15 hours and 20 minutes. However, four (4) students attended more than the required day hours and the remaining six (6) students do not appear to have consistently attended the required day hours or evening hours. In addition, the Date Range Report does not clearly indicate whether students attend during the day or evening as the Sign-In/Sign-Out time for each student is student listed “12:00 a.m.” for the Monday of the week. Further, iMed failed to show that students are utilizing the electronic Sign-in/Sign-out feature as the Sign-in and Sign-out occur on a single day while the attendance hours apply to multiple days.

Based on the foregoing, the Commission determined that iMed failed to demonstrate that the school enforces a policy of acceptable student attendance (Section VII (A)(3)(b), Substantive Standards, Standards of Accreditation).

5. iMed must demonstrate that, if an externship is part of the program completion requirements, students may not be considered as graduates or issued a graduation credential until the requirements of the externship have been satisfactorily completed (Section II (A)(8)(f), Substantive Standards, Standards of Accreditation). The December 13, 2018 TSR states that iMed’s Medical Billing and Coding program includes a mandatory 120-hour externship course. However, based on sampled graduate files reviewed by the on-site team, iMed did not appear to consistently require documented completion of the externship prior to considering the student a graduate and issuing a diploma to the student. Specifically, of the ten graduate files reviewed by the on-site team, two files did not contain any record of hours attended for the 120-hour externship and one graduate did not have any documented assessment by the on-site externship supervisor. In addition, the on-site evaluation team found that the school’s externship sign-in sheet states “[t]he student must complete 120 hours for externship within 3 to 4 weeks.” However, of the records reviewed the team found three students who appeared to complete their required hours over a period exceeding the stated four-week maximum.

In response to the December 13, 2018 TSR, iMed stated that the school “would allow students to participate in the Graduation Ceremony but would not issue a certificate if 120 hr. externship was not completed” and that “clerical errors caused some students to be awarded certificates without the externship hours.” In addition, the school indicated it had implemented the following:

- Plan to Graduate meetings which will periodically check the grades and hours for students along with a file audit;
• Externship Orientations to make students aware of the requirements;
• Having the Program Coordinator conduct Externship Info Sessions with all Onsite Supervisors to make them aware of the requirements;
• Eliminated the time restriction of only four (4) weeks to complete the externship;
• Dedicating one day per week to visit potential and current Extern sites; and
• Requiring students to sign an Externship Agreement with the understanding that they have to complete 120 hours to graduate.

However, the Commission found that the school did not provide documentation of implementation for any of the above items. In addition, the Commission was concerned that with the elimination of the four (4) week requirement but no discussion on a maximum amount of time to complete the course, that the externship course may extend for a significant period of time. Further, the Commission questioned how the school would assess that a student is meeting the school’s attendance policy and student academic progress policy while on externship.

Therefore, the Commission’s June 28, 2019 deferral letter directed iMed to submit information including the following:
• The school’s externship policies and procedures as found in the Policies and Procedures Manual;
• The school’s externship policy as found in the catalog;
• An explanation for how the school assesses that a student is meeting the attendance policy and student academic progress policy as it relates to the externship course;
• A list of all personnel who monitor externship along with documentation of their training on the updated externship policy;
• Documentation to demonstrate students have been notified of the change to the externship policy;
• Documentation of the Plan to Graduate meetings; Externship Info Sessions, and weekly site visits; and
• The Externship Agreements along with attendance records for any student who completed an externship between July 1, 2019 and October 31, 2019.

In response to the Commission’s June 28, 2019 deferral letter, iMed submitted the externship P&P and externship policy as found in the catalog which both state that “[t]he externship is a pass/fail course with grading based upon weekly, final assessment [sic].” In addition, the externship P&P states that “[t]here are no exams or letter grades assigned to externship students upon completion of their externship is a pass/fail course of study [sic].” However, both graduate transcripts included in the response indicate that each student received a grade of “A” for the externship course. Further, the Commission found that for one of the two graduates, the school’s final assessment of the externship occurred after the graduation date. Specifically, the “Leave Date” (i.e., graduation date) for Student ID# S________ is listed on the transcript as August 16, 2019 which is prior to the “Worksite Extern Assessment” dated August 23, 2019, which serves as the “written evaluation on the student” as required by the P&P. Similarly, the Externship Notes confirming the completed 120 hours for this graduate was signed by the Supervisor and Externship Coordinator on August 23, 2019.
Additionally, although the school indicated that it had eliminated the four (4) week requirement to complete the externship, the P&P and catalog state that “all externship hours of (120) must be completed within the designated number of weeks (emphasis added) in order to pass the course,” with no information about how many weeks are “designated.” The Commission also found that the first student completed the externship in five (5) weeks while the second student completed the externship in 11 weeks. Respectively, this would result in completion of the programs in six (6) months and almost nine (9) months, neither of which align with either of the program lengths, 28 weeks and 31.5 weeks, as stated in the catalog.

Further, the externship P&P states that the “extern must be supervised at the organization office supervisor and field placement supervisor [sic]” which conflicts with the “Externship Affiliation Agreement” which states that “[t]he supervisor shall be available to the students as a resource and offer counseling and guidance as needed.” The Commission noted a comment on the Student ID# S-

“Externship Notes” that states that the “[s]upervisor was not at the office at the time of the visit” and the signature line for that week was blank on the form which conflicts with both policies as stated above.

Lastly, the Commission noted that the school did not submit the following items directed in the June 28, 2019 deferral letter:

i. An explanation for how the school assesses that a student is meeting the attendance policy and student academic progress policy as it relates to the externship course;

ii. A list of all personnel who monitor externship along with documentation of their training on the updated externship policy; and

iii. Documentation to demonstrate students have been notified of the change to the externship policy.

Based on the foregoing, the Commission determined that iMed did not demonstrate that with an externship as part of the program completion requirements, students may not be considered as graduates or issued a graduation credential until the requirements of the externship have been satisfactorily completed (Section II (A)(8)(f), Substantive Standards, Standards of Accreditation).

6. iMed failed to demonstrate compliance with accrediting standards relative to Program Advisory Committees (“PAC”) in the following areas:

a. The school did not demonstrate that PAC meetings include at least three members in attendance that represent the employment community and/or practitioners from the program area (Section II (A)(6)(a), Substantive Standards, Standards of Accreditation).

b. The school did not demonstrate that written and detailed minutes of each meeting are maintained that include a description of all members in attendance (i.e., titles and affiliations) (Section II (A)(6)(c), Substantive Standards, Standards of Accreditation).

c. The school did not demonstrate that it reviews and comments at least annual review and comment on program length, learning resources, and the adequacy of facilities and equipment (Section II (A)(6)(d)(i), Substantive Standards, Standards of Accreditation).

The Commission considered that the December 13, 2018 TSR and June 28, 2019 deferral letter cite this as an area of concern and that the deferral letter specifically requested the school to submit copies of any meeting held since the submission of the response to the TSR. In response to the June 28, 2019
deferral letter, the school provided the names of five (5) PAC members. The Commission found, however, that that the school’s response does not include any meeting minutes.

With regard to PAC membership, the Commission noted that the response to the June 28, 2019 deferral letter includes an Organization Chart listing __________ as the __________ for the institution. This conflicts with the school’s assertion in the response to the December 13, 2018 TSR that “________” is no longer an employee but is still an active member of the Program Advisory Committee.” Additionally, the Commission noted the school’s “Policy/Procedure Number A.3.1 Title: Program Advisory Committees Policy” that states:

B. Membership

1. Each Advisory Committee shall consist of a minimum of three members representing business, industry, human services, education and the community at large.

2. Full-time iMed faculty or staff shall serve as ex-officio members. Part-time instructors who hold a full-time position within the field may be a member [emphasis added]. Membership should reflect an appropriate representative of gendered and of racial and ethnic minorities.

The policy for “part-time instructors” serving as PAC members conflicts with the Standards of Accreditation which requires an independent Program Advisory Committee comprised of appropriately qualified representatives external to the institution (i.e., non-school employees) (Section II (A)(5), Substantive Standards, Standards of Accreditation). As ________ was not included in the PAC profile forms in this latest response, the school failed to show ________ membership conforms to accreditation requirements and whether ________ is an employee or a PAC member or both.

Based on the foregoing, the Commission found iMed has not demonstrated compliance with ACCSC’s requirements regarding the Program Advisory Committee.

7. iMed failed to demonstrate that all advertising, promotional materials, statements, and claims are truthful and accurate and avoid leaving any false, misleading, misrepresenting, or exaggerated impressions with respect to the school, its training, or services (Section IV (B)(1), Substantive Standards, Standards of Accreditation). Specifically, the on-site evaluation team found that the school had made potentially misleading statements; advertised the Health Information Tech and Nurse Aid programs; referred to program lengths other than the current 6-month version; utilized superlatives; and included a discrepancy with the founding year of the school (2010 vs. 2012).

In response to the December 13, 2019 TSR, iMed updated the mission statement; removed references to the Health Information Tech and Nurse Aid programs from the website and ads; changed language to remove references to programs shorter than six (6) months; adjusted the founded date on the website to 2012; and stated that:

At the time of the onsite visit iMed had a website and printed material that needed to be updated. The program was no longer offered but the flyer was still in circulation. We put in requests to the website developer to make the appropriate corrections.

Currently the website has been updated to reflected [sic] the required changes see Exhibit R.

In the future we will require all digital and printed promotional materials are approved by the Campus Director prior to being in circulation.
While the Commission acknowledged the changes to website, the Commission found that the changes did not appear to have been implemented for all documents utilized by the school. Specifically, the 2018-2019 Admissions Training Packet script included the statement “[w]e have a MIBC or HIT program here at iMed which program are you interested in” and the statement “iMed Health Training Center was originally founded in 2010, by [redacted] to address the growing need for skilled medical professionals, and to help provide a quality service in the health field.” Additionally, the “Admission Requirements” on page 7 of the catalog states, “[a] high school diploma or GED or recognized equivalent is required except for the Nursing Assistant program.”

Further, a review of the screenshot of the website to demonstrate the removal of the Health Information Tech and Nurse Aid programs from the website includes the following language:

*iMed Health Training Center offers comprehensive academic programs in two general study areas including Medical Billing and Coding. Within these three broad based training programs, iMed students may choose among a number of possible medical specialist fields thus allowing the student better flexibility in future career planning.*

While there was no specific reference to the Health Information Tech or Nurse Aid programs in the updated website information, the language continued to refer to multiple programs and training areas, which did not appear to be truthful and accurate and could leave a false, misleading, misrepresenting, or exaggerated impression of the breadth of the school’s training programs.

Therefore, the Commission’s June 28, 2019 deferral letter directed iMed to submit the following information:

- The school’s advertising policies and procedures as included in the Policies and Procedures Manual;
- Updates to the website to clarify that the school only offers a single program or area, as applicable;
- All current advertisements; and
- An updated Admissions Training Packet

In response to the Commission’s June 28, 2019 deferral letter, iMed provided the updated “Admissions Packet 2019-2020.” The Commission reviewed this information and found:

- The packet continues to reference more than the single program cited in the June 28, 2019 deferral letter stating: “[w]e have a MIBC or HIT program here at iMed which program are you interested in.”

- The packet continues to refer to the incorrect founding year of the school (which should be 2012) stating: “iMed Health Training Center was originally founded in 2010 [emphasis added], by [redacted] to address the growing need for skilled medical professionals, and to help provide a quality service in the health field.”

In response to the Commission’s directive to submit the school’s Advertising policies and procedures as included in the Policies and Procedures Manual, iMed submitted “Policy/Procedure Number: K.1.1, Title: Advertising Policy and Procedure.” The Commission found the P&P refers to policies regarding external companies advertising on the iMed’s website rather than policies regarding
advertising for the school in order to demonstrate compliance with the accrediting standards cited in the June 28, 2019 deferral letter. Specifically the P&P states the following, *(emphasis added)*:

To further our mission of helping students prepare for career success, we **accept advertising and sponsorship** under strict guidelines as set forth herein ("Guidelines"). We reserve the right to refuse any advertisement we believe is incompatible with our mission. We also reserve the right to refuse any advertisement we deem competitive or contrary to the best interests of the company.

The following Guidelines govern various aspects of advertising within the network of Websites (the "Sites"). iMed’s has sole and absolute discretion with respect to interpretation and enforcement of this policy and all other issues associated with advertising and promotion on the Sites. iMed Health Training Center may change this policy at any time at its sole discretion by posting revised guidelines. iMed Health Training Center has sole discretion for determining the types of advertising and promotion that will be accepted and displayed on the Sites. The presence of an ad on our Sites or in e-mail communications does not imply endorsement of the advertised company or product. iMed's is not responsible for the content or accuracy of third-party advertisements.

iMed Health Training Center will not accept advertising that, in our sole opinion, is not in good taste. We will not permit the placement of a) advertising for illegal or objectionable products or services, or b) advertising that is offensive to any individual or group of individuals based on age, color, national origin, race, religion, sex, sexual orientation, or handicap. Advertising will not be accepted if it promotes any of the following: alcohol, firearms, ammunition, fireworks, gambling, pornography, tobacco, or the simulation of news or an emergency.

iMed prefers to work with advertisers who share our mission of helping students, schools, and families achieve their educational goals and who provide education-seeking families a broad array of choices for the future. iMed retains the exclusive right to determine the way in which any and all search results for specific information by keyword or topic are displayed on the Sites. We may display search results based on monetary incentives provided by advertisers.

In addition, as part of the “Website & Advertising Materials Corrections,” the Commission found that the school’s Website continues to reference the “academic programs in two general study areas” and the “three broad based training programs,” which was specifically cited in the deferral letter.

As such, the Commission found that iMed failed to demonstrate compliance with the accreditation standards regarding advertising.

Based upon the foregoing, the Commission voted to deny the Application for Initial Accreditation submitted by iMed Health Training Center located in Dallas, Texas.  

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5 Although not included in the grounds for denial, questions and concerns remain regarding the other eight (8) items listed in the June 28, 2019 deferral action.
**Appeal and Reapplication Process and Procedure**

iMed may opt to appeal the Commission’s decision to deny accreditation or may elect to reapply for accreditation. Details regarding the reapplication and appeal procedures are outlined in the ACCSC Rules of Process and Procedures, Standards of Accreditation.

- If iMed 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 March 30, 2020.**

- If iMed 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 April 20, 2020.**

- If iMed elects not to appeal this decision, the Commission’s decision will become effective **March 30, 2020.** The school may submit comments **on or before March 30, 2020** in accordance with the enclosed Public Comment Disclosure Form. Comments submitted by the school will accompany any public disclosure of a final Commission action pursuant to Section X (D)(4), Rules of Process and Procedure, Standards of Accreditation.

- In accordance with Section VII (N)(3) Rules of Process and Procedure, Standards of Accreditation, the school may reapply no sooner than nine months from the date on which the denial of accreditation becomes effective.

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

Sincerely,

Michale S. McComis, Ed.D.
Executive Director

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