Public Notice of Probation as of September 8, 2016

The following institutions are currently on Probation as directed by the Accrediting Commission of Career Schools and Colleges (ACCSC). A summary of the reasons for Probation for each institution follows this list. The specific accreditation standards cited in this document are available for review by downloading the Standards of Accreditation from ACCSC’s website.

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CONTINUED PROBATION

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What Does Probation Mean?

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may place a school on Probation. A school subject to a Probation Order will be required to demonstrate corrective action and compliance with accrediting standards.

The Commission may require a school to submit Commission-directed reports and receive on-site evaluation teams in conjunction with a Probation Order. Failure to demonstrate compliance with accrediting standards or other accrediting requirements by the end of the probationary period may result in the school being removed from the accredited list.

When a Probation Order is directed, a written notice is sent promptly to the school. The notice:

- States fully the reasons why the Probation Order was issued;
- Identifies the standard and other accreditation requirements with which the school may not be in compliance;
- Explains the reasons and cite the evidence indicating that the school may not be in compliance with accreditation requirements; and
- Advises the school of its obligations under the Probation Order and the deadline for response.

ACCSC’s Rules of Process and Procedure require a school subject to a Probation Order to inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website. A copy of the Probation Order is
made public via the Commission’s website in accordance with Section VII (L)(7), Rules of Process and Procedure, Standards of Accreditation1.

Commission Action Factsheet

The Commission Action Factsheet is designed to provide information on the types of actions afforded to the ACCSC Commission under the Standards of Accreditation. For a definitive overview of Commission Actions, be sure to review Section VII, Rules of Process and Procedure, Standards of Accreditation.

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1 See March 18, 2014 Accreditation Alert.
Dear Ms. Illingworth:

At the June 2016 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation submitted by Coast Career Institute (“CCI”) located in Los Angeles, California in conjunction with the results of the Commission-directed Unannounced On-Site Evaluation. Upon review of the May 12, 2016 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to place CCI on Probation with a subsequent review scheduled for ACCSC’s November 2016 meeting. The reasons for the Commission’s decision are set forth below.

History of the Commission’s Review:

February 2016

At the February 2016 meeting, the Commission considered the Application for Renewal of Accreditation submitted by CCI. Upon review of the October 22, 2015 Team Summary Report (“TSR”) and the school’s response to that report, the Commission voted to place CCI on Warning. The Commission found that the school’s response to the TSR raised significant questions about changes that are occurring at the institution, and the management’s ability to demonstrate current compliance with accrediting standards as a result. Accordingly, the Commission voted to direct CCI to receive an unannounced on-site evaluation team to conduct an assessment of CCI’s operations and compliance with accreditation requirements, in particular, to the following areas:

- Loss of federal student loan eligibility due to excessive cohort default rates;
- Failure to notify ACCSC of a Change of Location;
- Questionable admissions documentation;
- Failure to provide verifiable records of initial employment;
- Lack of institutional assessment and improvement planning;
- Lack of program structure and organization;
- Failure to furnish fully executed enrollment agreements to students prior to class start; and
- Lack of adequate management

June 2016

Upon review of the May 12, 2016 TSR and the school’s response to that report, the Commission voted to place CCI on Probation with a subsequent review scheduled for ACCSC’s November 2016 meeting. The reasons for the Commission’s decision are set forth below.

1 The address approved by ACCSC is 1354 S. Hill Street. See Concern #5 in this letter.
1. CCI did not demonstrate the school’s ability to manage the process of encouraging student repayment; to plan for the material impact that a loss of eligibility to participate in federal student loan programs would have on the financial structure and resources of the school; and plan for how the school will meet obligations to students including a teach-out plan in the event the school is unable to maintain operation (Section I (E)(iii), Rules of Process and Procedure, Standards of Accreditation). The history of the review of this matter is as follows:

- **Renewal On-site Evaluation:** CCI’s three-year Cohort Default Rate (“CDR”) for fiscal-year 2011 as published by the U.S. Department of Education (“the Department) is 55.7%. The Department notified CCI that the school lost eligibility to participate in the William D. Ford Federal Direct Loan Program, effective May 22, 2015.

- **CCI Response to the October 22, 2015 TSR:** CCI stated that the school had submitted an appeal to the Department of Education and was waiting for a response. In addition CCI stated that the school’s “current default rate” is 6.1%. The response does not include a copy of the appeal or any explanation as to what is meant by “our current default rate or the source of the data used to estimate a default rate of 6.1%.

- **School Action Letter dated April 11, 2016:** The Commission noted that the Department had published the school’s three-year CDR for the fiscal-year 2012, which was 47.2%. The Commission noted that 47.2% represents a modest improvement over the 55.7% for the fiscal-year 2011; however, it appears that the school is still subject to loss of eligibility to participate in the Federal Family Education Loan (FFEL) Program and/or William D. Ford Federal Direct Loan (Direct Loan) Program because the school’s fiscal-year 2012 official cohort default rate is greater than 40.0%. According to the Department, “if a school fails to successfully appeal this sanction, it will lose eligibility to participate in the FFEL and/or Direct Loan Program until September 30, 2017.”

- **Unannounced On-site Evaluation:** The on-site evaluation team requested a copy of CCI’s appeal of the three-year CDR for the fiscal year 2011; however, no one at the school had a copy. When asked, none of the managers present during the on-site evaluation were aware of whether CCI had received a response from the Department regarding the outcomes of the appeal. When asked about the claim regarding the “current default rate” being 6.1%, the managers present during the on-site evaluation were unable to explain what was meant by the statement and could not produce documentation to support that claim. The school hired a third-party servicer to assist with reducing the CDR. Although the school was unable to provide data relative to the draft three-year CDR for the fiscal-year 2013, the school’s third party servicer provided data during the on-site evaluation, indicating that the draft rate is 20.4%. It was unclear to the team as to whether the recent improvement had any impact on CCI’s eligibility to participate in the federal loan program.

- **CCI Response to the May 12, 2016 TSR:** In response to the May 10, 2016 TSR, CCI provided copies of the Department’s notification letters – dated February 2014 and February 2016 – announcing the school’s 2011 draft CDR and the school’s 2013 draft CDR respectively. The Commission found that the correspondence did not provide any new information with regard to the school’s status with the U.S. Department of Education. In addition, CCI provided a narrative stating:

> To date CCI does not have any written communication from the Department regarding the institution’s eligibility to participate in the federal student loan. CCI received a call the afternoon of June 22, 2016 from Marilyn Green at the Department of Education who indicated she would provide CCI a letter June 23, 2016 stating that CCI is eligible to
participate in Pell Grants. She also indicated that once CCI’s Compliance Audit and Financials were submitted she would provide a new ECAR. CCI will provide the documentation to ACCSC in a follow-up response when received. Ms. Green indicated a decision on the appeal to participate in the student loan program is under consideration. However, CCI does not currently plan to participate in the federal student loan program.”

It is unclear whether CCI intends to either continue the appeal process with the Department or to move forward with plans to operate without participating in the federal student loan program. The Commission also noted that CCI has yet to provide a copy of the school’s appeal of the fiscal year-2011 CDR, or copies of correspondence from the Department regarding the status of that appeal or the school’s eligibility to participate in the federal student loan and Pell Grant programs.

CCI does not anticipate that the school’s eligibility to participate in the Pell Grant program will cease, based on the verbal notification of approval to participate in the program from Marilyn Green that a letter will be sent to CCI June 23, 2016. CCI will develop a copy of the budget that outlines the current financial plan. Should the institution cease offering Pell Grants the institution would downsize and relocate to a smaller facility.

As directed, the school included a completed ACCSC Institutional Teach-Out Plan Approval Form. The first attachment to that form is to be a list of all currently enrolled students and estimated graduation dates. The school included a list of 84 student names; however, that list appears to be incomplete, as it includes only students with last names that start with letters A through M. According to the school, as of June 22, 2016, the last date of graduation for current students is January 5, 2017. The school provided a timeline of events, indicating that the duration of the teach-out would be 11 months, as follows:

- Month 1: Written notification via memorandum to personnel, students and governing agencies. Terminate admission personnel.
- Month 2 – 8: Maintain instructors and support as personnel needed. Terminate instructors as programs are taught out.
- Month 9-10: Provide continued support services to graduates, records and career services.
- Month 11: Close.

The Commission found that the timeline does not describe how the delivery of training and services to students will not be materially disrupted and that obligations to students will be timely met. With regard to how CCI is positioned to resource a teach-out, the school provided, for the abbreviated list of students, information Regarding charges, payments, and balances. The columns provided – from left to right – are as follows: start date, expected end, status, tuition, fees, supplies, ledger card charges, amount paid, balance, tuition, earned, balance, deferred unearned\[sic\]. The Commission noted that there are two columns each for tuition and balance, without explanation of how each amount is derived. The amount paid is listed without differentiating the source of the payment (e.g., financial aid). The Commission found that in absence of a complete list of students, and a narrative explaining the information supplied, the school has not provided sufficient information regarding current refunds due, unearned tuition (that has already been collected), and account balances.
The Commission also directed CCI to submit a detailed financial plan to demonstrate the school’s plan teach-out plan will be adequately resourced. The school provided a document titled “FY2016 Budget/2016 Budget with Budget to Actual Semi Annual Analysis – 2016.” The document lists $1,355,500 in revenues and itemized operating expenses totaling 479,300 with total expenses as $1,034,300. Despite the title, the document does not include a Budget-to-Actual Analysis. There is no narrative provided to explain how the school is maintaining sufficient financial resources to fulfill obligations to students in the event of a school closure. The Commission found that that the FY2016 Budget does not constitute a detailed financial plan.

With regard to the directive to submit the school’s most recent cohort default management plan, CCI indicated that the school contracted with Wright International Student Services (“WISS”), Default Management Solutions on September 15, 2014. Rather than providing a copy of the school’s plan, CCI provided a copy of the third-party vendor’s services to assist the school with maintaining a low default rate and to assist students with loan debt. CCI did not provide a specific plan customized to the institution or any assessment regarding the school’s excessive cohort default rates.

Overall, the Commission found that CCI has not demonstrated the ability to manage the process to manage or encourage student repayment; has not demonstrated that the school has developed a reasonable plan of action for the material impact that a loss of eligibility would have on the financial structure and resources of the school; and has not demonstrated that the school has sufficient resources to meet obligations to students in the event the school is unable to maintain operations.

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

a. A copy of any correspondence between the school and the Department regarding the school’s CDRs and the school’s eligibility to participate in the federal student loan and Pell Grant programs;

b. A revised ACCSC Institutional Teach-Out Plan Approval Form that provides all information required in the instructions and all attachments to demonstrate that, in the event of closure the school has a plan for students to complete their education which is not materially disruptive and that ensures obligations to students will be timely met;

c. A detailed financial plan to demonstrate the school’s plan teach-out plan will be adequately resourced;

d. A copy of the school’s most recent cohort default management plan including:
   i. Documentation to demonstrate that the school is engaging in ongoing efforts to promote student loan repayment;
   ii. A detailed description as to how the school determined the effectiveness and appropriateness of this plan taking into account the reported CDR; and
   iii. A description of any changes made to the school’s CDR management plan or changes to institutional policies regarding the school’s efforts in this regard; and

e. An explanation as to any additional steps the school has undertaken with regard to this matter (e.g., additional resources committed, appeal initiated).

2. CCI failed to demonstrate that the school determines that every applicant meets the admission’s requirements prior to enrollment (Section V (A)(4)(a), Substantive Standards, Standards of
Accreditation). At issue is the school’s acceptance of completion awards that have not been shown to be the equivalent of a high school diploma. The history of the review of this matter is as follows:

− Renewal On-site Evaluation: The on-site evaluation team found that out of 70 files sampled, 41 students claim to possess a “high school diploma” from East Beverly High School (“EBHS-Santa Monica”) located in Santa Monica, California. During the on-site evaluation, the school was unable to demonstrate that the credential awarded by that institution is the equivalent of high school diploma. In addition, the on-site evaluation raised the question as to whether the 22 students admitted on the basis of a credential from EBHS-Santa Monica were eligible for the funding received through the federal student financial assistance program.

− CCI Response to the October 22, 2015 TSR: CCI stated:

  Coast Career Institute spoke with East Beverly Hills H.S. whereas it was stated they had two graduation dates per year. Each of their students would fall under those two specific dates. Furthermore, although East Beverly Hills High School does have a training facility. Coast Career Institute is no longer enrolling graduates from East Beverly Hills High School Our admission’s officer is now performing more in depth research into High School verification prior to student enrollment.

− School Action Letter dated April 11, 2016: The Commission noted that the response did not provide information regarding how the completion award from EBHS-Santa Monica can be considered the equivalent of a high school diploma. In addition to being non-responsive to the question regarding the EBHS-Santa Monica credential, the response also raises questions with regard to the management and oversight of the admissions process. And, in absence of documentation that the EBHS-Santa Monica credential is the equivalent of a high school diploma, CCI has not demonstrated that the 22 students were eligible for the federal financial aid received.

− Unannounced On-site Evaluation: School officials informed the on-site evaluation team that in the past, CCI referred applicants without high school diplomas to EBHS-Santa Monica. The process of obtaining a diploma from that institution seemed to take only a matter of weeks. Ms. Illingworth indicated that due to ACCSC’s questions regarding the institution, she had visited East Beverly High School in Los Angeles, California on two occasions and had observed a functional institution. The on-site evaluation team pointed out that the institution in question is purportedly based in Santa Monica, not Los Angeles, and Mr. Illingworth admitted she had not visited an institution in Santa Monica. As part of the school’s response to the October 2015 TSR, CCI claimed to have ceased accepting credentials from EBHS-Santa Monica and to have strengthened the admissions process to include more in-depth research of high school credentials. Despite this claim, the on-site evaluation team’s file review showed that CCI accepted at least one additional credential from EBHS-Santa Monica subsequent to that claim. In addition, the team found that the school admitted two students with potentially unreliable credentials from two other institutions: Aberdeen Academy High School and Alford High School.

− CCI Response to the May 12, 2016 TSR: CCI’ response repeats the information provided to the on-site evaluation team – that Ms. Illingworth visited a school named “East Beverly High School” in Los Angeles and observed classes. To support the school’s assertion of the existence of the school, CCI included a picture of the “school site.” The picture appears to be a Google Earth image captured in April 2015 of the building at 672 S La Fayette Park Place in Los Angeles, California. The Commission noted – as did the on-site evaluation team in April 2016 – that the institution in question is purportedly located in Santa Monica and is not at the location that Ms. Illingworth visited in Los Angeles. The school also provided documentation that shows “Beverly High School” located at 672 Lafayette Park Place, Suite 15 is listed in the California
Department of Education Directory. Again, the Commission noted that the documentation is for an institution with a different name from the school in question and which is located in Los Angeles, not in Santa Monica. Based on a visit to and documentation of approval for a similarly named school in a different location, the school stated that “[w]e have documented that East Beverly Hills High School credential is valid.” The Commission disagreed with this assertion.

With regard to the four students identified in the May 12, 2016 TSR as having either no documentation or unacceptable documentation, CCI provided the following:

- The school restated the on-site evaluation team’s finding that [redacted] was admitted on the basis of an EBHS-Santa Monica credential, with no further information.
- [redacted] was admitted on the basis of a credential through Alford High School and [redacted] was admitted on the basis of a credential through Aberdeen Academy High School. CCI acknowledged that the high school documentation from these two institutions does not appear to be valid and stated “[a]s a result we have asked our third party compliance advisor to research the transcript received from Alford High School and are seeking advice from our Title IV expert and provide (sic) an update to ACCSC.”
- [redacted] was admitted on the basis of a credential from Hawthorne High School in Hawthorne, California. The school provided a transcript showing that [redacted] graduated from the institution on August 25, 2013.

The Commission found that CCI has failed to demonstrate that the 44 students known to be admitted on the basis of a “diploma” from EBHS-Santa Monica, Alford High School, or Aberdeen Academy High met the school’s admissions criteria. CCI has not demonstrated that the 22 students admitted on the basis of a diploma from EBHS-Santa Monica and known to have received student financial assistance were eligible for those funds. Moreover, the Commission found the school admissions process to be wholly mismanaged such that such a significant number of students have been enrolled based on dubious documentation and which could have been prevented using a simple internet search.

With regard to the requirement to that CCI submit a description of the oversight of the admissions process identifying the individuals responsible for determining the authenticity/equivalency of a high school credential, the school’s response states the following:

If a member of the Admission department obtains documentation for a prospective student that appears not to be valid that document it will be provided to the Assistant Director to research the validity of the document. Resources for verification include:

1. Review of the school’s website to location document of a known agencies approval (such as the links below).
2. Research using the links below and / or the school district in which the school’s is located.
3. Request a transcripts (sic) to verify coursework.

The response includes documentation (enrollment agreements and admissions documentation) for the most recent 20 students admitted. From the documentation provided, it appears the students were all admitted on the basis of a reliable high school diploma, with the exception of [redacted]. The school provided an enrollment agreement for [redacted] but
did not provide documentation of a high school diploma. The school provided a high school
diploma for [REDACTED] but did not provide an enrollment agreement.

Although the school’s submission of apparently reliable high school documentation for applicants
admitted between April 25, 2016 and June 16, 2016, serious questions remain with regard to the
school’s admission of students in the absence of reliable high school credentials. CCI has not
demonstrated how a completion credential from EBHS-Santa Monica is acceptable for the purposes
of meeting the school’s admissions criteria, and has made no response regarding the Aberdeen
Academy High School and Alford High School credentials. The Commission found the school’s
claim that it visited a functioning high school in Los Angeles to be less than cogent. At this juncture,
it is imperative that CCI either provide compelling evidence to support the validity of the school’s
admissions decisions or make appropriate reparations for the consequences of invalid admissions
decisions. Specifically, in cases where CCI cannot demonstrate that an admissions decision is based
on valid credentials, the school is required to return any monies collected from the students and from
agencies through which CCI obtained funding under the pretense of a valid admission. In addition,
CCI has not demonstrated that school’s management understands the fundamental issue of using only
reliable high school credentials as an indicator of an applicant’s ability to succeed in the program and
has failed to demonstrate that the school’s management is capable of developing criteria that will
enable the school to make an informed judgment in this regard.

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

a. A list of every student admitted on the basis of a high school diploma during 2015 and 2016, a
description of the high school documentation collected by the institution, and whether the student
received funding through the federal financial assistance programs;

b. A list of each high school from Item (a) that is not accredited by an agency recognized by the US
Department of Education. For each, the school must provide evidence that the credential awarded
by the institution constitutes the equivalent of a high school diploma; and

c. Documentation that the school has refunded or returned funds to all students and/or funding
agencies or authorities for any student admitted based upon invalid high school credentials.

The Commission noted that this next submission constitutes the school’s third opportunity to
demonstrate that the school is capable of identifying reliable high school diploma upon which to
make an informed admissions decision. A continued lack of response or demonstrated compliance
will result in a finding that CCI has failed to fulfill the responsibility that 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.

3. CCI has yet to demonstrate that when the school enrolls a person who does not possess a high school
diploma or recognized equivalency certificate that the determination of the applicant’s ability to
benefit from the training offered is confirmed by documentation of the applicant’s achievement of an
approved score on a test that has been reviewed by a qualified, independent third party for
appropriateness of the instrument and specific score levels required for admission (Section V (B)(1),
Substantive Standards, Standards of Accreditation). The history of the review of this matter follows
below.

– **Renewal On-site Evaluation:** According to the August TSR, CCI does not admit students without
a high school diploma.
− **Unannounced On-site Evaluation:** The on-site evaluation team noted that the school had begun accepting applicants who do not possess high school diplomas and raised questions about the school’s practices in this regard. Although the catalog states that the school utilizes the Wonderlic Entrance Exam, the files for all students admitted on an ability-to-benefit basis included scores for the Combined English as a Second Language (“CELSA”) I test. This test, published by the Association of Classroom Teacher Testers, is approved by the US Department of Education as an ATB test for students whose second language is English. The school’s managers were unable to explain how it was determined that this test is an appropriate instrument and that the specific score levels required for admission are appropriate indicators of an applicant’s ability to achieve the objectives of the program.

− **Response to the May 12, 2016 TSR:** The school’s response states:

> CCI is working with legal counsel to review the Career Pathways program implemented to determine compliance. Until this review is completed (estimated July 2016) CCI has ceased ATB as a means of admissions to any CCI program. Counsel had previously scheduled appointments and depositions scheduled in June, therefore we requested an extension of time to submit additional information regarding any additional actions that may occur. CCI will provide additional narrative and documentation in a follow-up response.

The Commission noted that the school has engaged legal counsel to review federal regulations pertaining to eligibility for federal student financial assistance to students admitted on an ability-to-benefit basis. Those regulations differ from ACCSC’s standards, which are intended to ensure that the school has established a means by which to make an informed decision with regard to an applicant’s capability of achieving the program’s educational and training objectives. Therefore, implementation of the “Career Pathways” program to determine a student’s eligibility for federal funding does not obviate the school’s responsibility to comply with accrediting standards in the process of admitting that student. CCI must demonstrate that when the school enrolls a person who does not possess a high school diploma or recognized equivalency certificate that the determination of the applicant’s ability to benefit from the training offered is confirmed by documentation of the applicant’s achievement of an approved score on a test that has been reviewed by a qualified, independent third party for appropriateness of the instrument and specific score levels required for admission.

Based on the foregoing, the Commission determined that although the school may have ceased enrolling students who do not possess high school diplomas on a temporary basis, CCI has again failed to demonstrate the validity of the basis of all admissions decisions. Therefore, the Commission directs the school to submit the following:

a. An attestation as to whether the school is currently admitting students who do not possess a high school diploma or recognized equivalent;

b. A description of the school’s current admissions policy and effective date, as well as an excerpt from the current catalog, showing that policy is disclosed to students;

c. If the school is currently admitting students who do not possess a high school diploma, provide a copy of the test used to admit students who do not possess a high school diploma or recognized equivalent, and evidence that the test and specific score levels required have been reviewed by a qualified, independent third party.

d. A list of the students admitted in 2015 and 2016 who did not possess a high school diploma or recognized equivalent, a description of the test, cut-off score, and the score each student achieved
that was used as the basis of admission. Also, indicate whether the student received funding through the federal financial assistance programs; and

e. For each entrance test and cut-off score used as a basis of admission (if different from the test listed in (b) above), evidence that the test and specific score levels required have been reviewed by a qualified, independent third party.

4. CCI did not demonstrate that the school notified the Commission in advance of changes taking effect or being implemented in accordance with the provisions set forth in the Rules of Process and Procedure as it pertains to changes of location (Section IV (A)(1), Rules of Process of Procedure, Standards of Accreditation).

- **Renewal On-site Evaluation:** The on-site evaluation team found that CCI no longer occupies the 1354 S. Hill Street, which is currently the official address on record with ACCSC, The California Bureau for Private Postsecondary Education (“BPPE”), and the United States Department of Education (“the Department”). CCI had moved entirely into 1340 S. Hill Street, which constitutes a change of location. The school failed to notify the Commission in advance of the change.

- **CCI Response to the October 22, 2015 TSR:** CCI submitted a letter with the response, describing the consolidation of the school into the facility at 1340 S. Hill Street in Los Angeles. In addition, the school provided a copy of the school’s City of Los Angeles Tax Registration Certificate, which shows the school’s address as 1340 S. Hill Street.

- **School Action Letter dated April 11, 2016:** The Commission found that the school’s letter with regard to the change of location does not fulfill ACCSC’s reporting requirements for the notification and application for approval of a change of location. The Commission found that CCI had yet to show that the school understands ACCSC’s requirements with regard to the approval of substantive changes and is able to follow the appropriate process and procedures.

- **Unannounced On-site Evaluation:** CCI was unable to provide further information with regard to the change of location. Ms. Illingworth stated that she thought the previous director had already taken care of the change of location issue; however, that does not appear to be the case. The following documents do not appear to have been updated with regard to the school’s new address, as it is still listed as 1354 S. Hill Street on CCI’s state license, the Department’s website, and on the school’s most recent catalog.

- **Response to the May 12, 2016 TSR:** CCI acknowledged that the school had failed to notify ACCSC, BPPE, or the Department regarding the change of location and had not yet completed the required applications. The school estimated that CCI would be able to submit the required application to ACCSC the week of June 27, 2016. According to the school’s response, once ACCSC approves the change of location, CCI will submit approval requests to BPPE and the Department.

The on-site evaluation team requested that the school provide a narrative regarding how the new location and facility are sufficient to accommodate CCI’s programs and student body specific to the library, equipment, classrooms, and available learning resources. In response, the school stated the following:

*The facility accommodates CCI’s programs and student body specific to the library, equipment, classrooms, and available learning resources as it consists of over 15,575 square feet. Which includes nine classrooms, ten separate administrative offices, one student resource library/computer room, one student lounge/lunch room, and one faculty/staff lounge/lunch room, one conference room, three wash areas, three restroom*
areas (multiple stalls in each), and two disabled access restrooms. The combined lecture and lab classrooms can accommodate 24 to 32 students.

The Commission found that the narrative is an assertion that the facility meets the requirements, rather than an explanation as to how the school reached that determination and upon what evidence the assertion is based.

The on-site evaluation team also requested evidence that the new facility meets fire, safety, and sanitation standards required by appropriate regulatory authorities. In response, CCI provided only a copy of the City of Los Angeles Tax Registration Certificate, the same certificate that had been submitted in response to the October 2015 TSR. According to the certificate, it is “issued for tax compliance purposes only” and “not a license, permit, or land use authorization.” Therefore, the Commission concluded that this certificate does not constitute evidence that the facility meets fire, safety, and sanitation standards required by appropriate regulatory authorities.

Although the original failure to fulfill reporting requirements may have been an oversight, the Commission found it unacceptable that CCI has subsequently failed to rectify the situation once the matter was brought to the school’s attention during the August 2015 on-site evaluation conducted in conjunction with the school’s Application for Renewal of Accreditation. On July 8, 2016, subsequent to the Commission’s consideration of this matter, CCI submitted an Application for a Change of Location-Part I and the corresponding fee of $750. The school did not, however, submit the Application for a Change of Location-Part II, which is to be submitted after the change of location is complete.

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

a. The Application for a Change of Location-Part II immediately to the ACCSC;

b. Copies of the completed Application for a Change of Location-Part I and Application for a Change of Location-Part II submitted to ACCSC’s offices along with the proof of payment of the corresponding fees;

c. A description of the local fire, safety, and sanitation standards with which the school’s facilities must comply, and documentation that the school has been determined to be in compliance with each; and

d. A detailed narrative regarding how the new location and facility are sufficient to accommodate CCI’s programs and student body specific to the library, equipment, classrooms, and available learning resources.

The Commission noted that this is the school’s third opportunity to demonstrate that the school is capable of notifying the Commission in advance of changes taking effect or being implemented in accordance with the provisions set forth in this section of the Rules as it pertains to changes of location. A continued lack of response in this matter will call into question the CCI’s eligibility for ACCSC accreditation as the school will have failed to fulfill the responsibility that 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.

5. Program structure: CCI did not demonstrate that for every program there are detailed and organized instructional outlines and course syllabi showing a scope of sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies (Section II (A)(2)(a), Substantive Standards, Standards of Accreditation).
Renewal On-site Evaluation: The on-site evaluation team found that CCI does not provide students with syllabi for each course within their designated program. Instead, students are provided with a program syllabus, description, and content outline that do not include specific learning outcomes for each module within the course.

CCI Response to the October 22, 2015 TSR: The school provided a copy of syllabi for the Cake Decorating, Optical Dispensing Technician, Private Security Guard, and Solar System Installation Technician programs.

School Action Letter dated April 11, 2016: The Commission noted that the documents that the school referred to as “syllabi” are course descriptions that include only course titles, instructional hours, and credit hours.

Unannounced On-site Evaluation: The school was unable to furnish any information other than that provided with the response to the TSR. In addition, the on-site evaluation team raised a question regarding the sequencing of classes and the educational administration of the school’s programs.

CCI Response to the May 12, 2016 TSR: In response to the on-site evaluation team’s request for information regarding the individuals responsible for on-site supervision of the school’s programs, CCI indicated that Saleha Shah is the Director of Education and provided a copy of Ms. Shah’s resume and a copy of her Master of Science in Education certificate. The Commission noted from Ms. Shah’s resume that she does not have the appropriate experience and education to oversee college level faculty and educational administration. Specifically, the Commission noted that with regard to her experience, Ms. Shah’s professional experience is limited to a Student Teacher position at the secondary level. In addition, the Commission noted that Ms. Shah’s Master of Science in Education is specifically for Early Childhood and Childhood Education birth – sixth grade, rather than college-level based education. Based on the aforementioned information, the Commission found that CCI has yet to demonstrate that Ms. Shah is qualified to serve as the school’s director of education.

The on-site evaluation team requested detailed and organized instructional outlines and course syllabi for each program to show a scope and sequence of subject matter sufficient to achieve the program objectives and acquired knowledge. In response, CCI stated that the school is re-reviewing curriculum documentation (outlines / syllabi) for updates and compliance and that the school will provide full supporting documentation for each program in a “response follow-up.”

With regard to the question of course sequencing, CCI indicated that the school will cease enrolling students on a weekly basis at the school and prospective students who meet the admission requirements will now start at the beginning of each module. The response does not provide further explanation with regard to how this strategy is meant to resolve the problems caused by a lack of clear course sequencing.

Overall, the Commission found that CCI has not demonstrated an understanding of how to construct instructional outlines and course syllabi nor how to design an appropriate course sequence. This concern is compounded by the question regarding lack of qualified educational administration at the school.

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

a. Additional details regarding Ms. Shah’s education and experience and how her education and experience supports her Director of Education role specific to her ability to lead and manage the
school’s instructional programs and administrative staff. Provide any additional documentation to support Ms. Shah’s experience and training relative to a leadership role in a higher education institution, and

b. Detailed and organized instructional outlines and course syllabi for a sample of courses in each program showing a scope and sequence of subject matter sufficient to achieve the program objectives and to acquire the necessary knowledge, skills, and competencies.

The Commission noted that this is the third request for a demonstration of compliance in regard to instructional outlines and course syllabi. A continued lack of response in this matter will call into question the CCI’s eligibility for ACCSC accreditation as the school will have failed to fulfill the responsibility that 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.

6. CCI did not demonstrate that the school supports student achievement rates through student transcripts, the school’s verifiable records and documentation of initial employment of its graduates, and exam pass rate data obtained from the requiring entity (Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation and Appendix VII–Guidelines for Employment Classification). The history of review of this issue follows.

− Renewal On-site Evaluation: The school did not provide complete and verifiable documentation for the following classifications reported on the Graduation and Employment Charts submitted with the school’s 2014 Annual Report: “Unavailable for Graduation,” “Unavailable for Employment,” “Graduates-Further Education.” In addition, the team found that the school does not have complete records for graduates classified as “employed in field,” and is not obtaining attestations for self-employed graduates in accordance with the Guidelines for Employment Classification.

− CCI Response to the October 22, 2015 TSR: In response to the aforementioned issues, CCI stated that the school revised the graduate placement record for CCI’s career services officer to complete and implemented a new form for all self-employed graduates. The school included only blank copies of both forms with its response.

− School Action Letter dated April 11, 2016: Although the forms appear to be structured in a manner that would collect all required information for employment records, CCI did not provide completed copies of the documents to demonstrate that the forms have been implemented successfully. In addition, CCI did not explain how the school secures documentation to support the status of “unavailable for graduation.”

− Unannounced On-site Evaluation: CCI was unable to provide documentation during the unannounced on-site evaluation that the forms have been implemented. In addition, the school provided no information about whether CCI maintains supporting and verifiable documentation for each graduate classified as “Unavailable for Graduation,” “Unavailable for Employment,” or “Graduates-Further Education.”

− CCI Response to the May 12, 2016 TSR: The on-site evaluation requested that CCI submit a detailed description of the school’s process and procedures for recording and verifying graduate employment to include any updates made since the on-site evaluation. In response, CCI stated the following:

CCI has provided in Exhibit 6a, documentation of the process for verifying a placement, which are completed verification forms. CCI has engaged a third party compliance firm
with over 20 years of experience to audit and review policies, procedures and forms with
management and staff. This is an on-going process that CCI will provide an update to
ACCSC with the additional followup materials addressed within this response document.

Although the school provided completed verification forms, CCI did not submit a description of
the process and procedures for records and verifying graduate employment classifications. The
school refers to engaging a third-party compliance firm to perform an audit and review policies
and procedures; however, there is no detail with regard to what the third-party will be asked to
perform, the expected time frame for this action, or how the school intends to use the result of the
review.

The on-site evaluation team requested that CCI provide documentation for each student who
graduated from February 1, 2016 to March 31, 2016 to demonstrate that the school has made the
necessary revisions to its policies and procedures as a means to ensure that there is supporting and
verifiable documentation for each graduate classified as “Unavailable for Graduation,”
“Unavailable for Employment,” or “Graduates-Further Education.” The school’s response
includes a list of 28 graduates indicating that 11 graduates are employed in the training field;
however, the school provided the complete Graduate Placement Records for only six of the
eleven graduates. In addition, there was one student identified as “Unavailable for Graduation-
Further Education.” This student graduated from the Optical Dispensing program and was
unavailable for employment in that field due to his enrollment in the Solar Installation program at
CCI.

Overall, the Commission found that CCI’s response does not provide any further explanation of the
school’s current process and procedure or show that any changes have been implemented. The
school’s reference to the engagement of third-party compliance firm provides no assurance that the
school will engage in the assessment in a meaningful way and be able to incorporate the results in an
effective plan to improve the institution. The Commission’s concern is heightened by the school’s
inability to provide employment documents for a mere eleven students.

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

a. A detailed description of the school’s process and procedures for recording and verifying
   graduate employment demonstrating compliance with ACCSC’s Guidelines for Employment;

b. For each student who graduated from February 1, 2016 through August 31, 2016,2 provide the
   following information for each of the school’s programs (under employment status, the school
   must use the classifications set forth in the ACCSC Graduation and Employment Chart:
   “Graduates-Further Education,” “Graduates-Unavailable for Employment,” “Employed in Field,”
   “Unemployed,” “Employed in Unrelated Field,” or “Unknown”):

<table>
<thead>
<tr>
<th>Student Name</th>
<th>Program</th>
<th>Graduation Date</th>
<th>Employment Status (Use Category from G&amp;E Chart)</th>
<th>Written Verification (✓ Doc. Source)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Grad</td>
<td>Employer</td>
</tr>
</tbody>
</table>

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2 This timeframe incorporates the previous reporting requirement of February 1, 2016 through March 31, 2016, as the school
failed to provide complete documentation. In addition, the timeframe is expanded to incorporate more recent graduates to
determine if the school’s practices in this area have improved.
c. For each graduate listed as employed in field:

<table>
<thead>
<tr>
<th>Graduate Name</th>
<th>Program</th>
<th>Start Date</th>
<th>Place of Employment, Address &amp; Phone#</th>
<th>Employer Point of Contact</th>
<th>Date of Initial Employment</th>
<th>Descriptive Job Title</th>
</tr>
</thead>
</table>

d. Supplementary information for the charts above:

i. For each regular employment provide a copy of the school’s completed verification form and one of the following:
   - Written documentation from the employer verifying the employment and that the employment is related to the student’s program of study at the school;
   - Written documentation from the graduate verifying the employment and that the employment is related to the student’s program of study at the school; or
   - In cases where a school can show diligent efforts have been made to secure such written documentation without success, how the school maintains employment verification records that include a) the graduate’s and employer’s name and contact information, b) a signature of school staff attesting to verbal employment verification with the employer and the graduate, and c) the date(s) of verification are acceptable.

ii. For each graduate classified as self-employed, provide a signed statement from the graduate that includes the graduate’s name and contact information acknowledging that the position is aligned with the individual’s employment goals, is vocational, is based on the education and training received, and that the graduate is earning training-related income, as well as some form of verifiable documentation to demonstrate that the employment is valid;

iii. For each graduate classified as “career advancement,” provide supporting and verifiable documentation for each graduate to include a signed statement from the graduate or employer acknowledging that the training allowed the graduate to maintain the employment position due to the training provided by the school or that the training supported the graduate’s ability to be eligible or qualified for advancement due to the training provided by the school; and

iv. For each graduate reported as “Graduates-Further Education” or “Graduates-Unavailable for Employment,” provide supporting and verifiable documentation to demonstrate that the classification is appropriate and meets the Commission’s defined allowances.

7. CCI did not demonstrate that the school 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). The history of review of this matter follows:
   - **Renewal On-site Evaluation:** The on-site evaluation team found that the planning document provided appears to be only a task list of the school’s current operations, does not go beyond the current year or address the school’s May 22, 2015 loss of eligibility to participate in the William D. Ford Federal Direct Loan Program; does not address the discontinuation of three (3) programs (Diagnostic Medical Sonography; Floral Arrangements & Bridal Accessories; and Medical Office Assistant); and does not address the pending closure of the branch campus located in Colton, California.
CCI Response to the October 22, 2015 TSR: The school’s response states:

*Coast Career Institute (CCI) maintains an ongoing institutional assessment plan. It is a task list to remind CCI items to be addressed and implement new items as well. We are attaching our revised institutional assessment plan for the following years 2016, 2017, and 2018. All supporting documentation will be maintained with the executive director, available upon request.*

School Action Letter dated April 11, 2016: The Commission found that the copy of the “revised institutional assessment plan” provided by CCI as part of the response does not show evidence of the school’s self-evaluation process or the improvement planning process. The document appears to be more of a procedural checklist that shows how the school intends to conduct assessment and improvement planning, rather than documentation that the process has taken place.

Unannounced On-site Evaluation: Ms. Illingworth indicated to the on-site evaluation that she was not familiar with the document described in the school’s response. The team found none of the managers present during the unannounced on-site evaluation, or the owner Ms. Illingworth, were able to produce planning documents or evidence of any ongoing institutional assessment and improvement activities.

CCI Response to the May 12, 2016 TSR: The school’s response states, in total:

*CCI acknowledges that this document needs revision and at a minimum yearly updates, to be an effective as the go to tool to improve our institution. We have taken the ACCSC standards and outlined the content format in a more effective manner. Our extension request was so that after our site visits concluded the week of June 20, 2016 our team could focus on creating a quality document. When a finalized document is completed in July 2016 it will be added to the followup response document.*

The Commission found that the school’s response does not provide useful information to answer the questions that have been raised about the school’s institutional assessment and improvement planning process. Accordingly, the Commission directs the school to submit the following:

a. A description of the school’s ongoing institutional assessment and improvement planning process, how the staff, faculty, students, Program Advisory Committee, and other external interests contribute to the school’s self-evaluation, and how the self-evaluation process is a meaningful, significant, and ongoing process;

b. A copy of the school’s current assessment and improvement planning document that shows 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; educational program curricula; learning resources system, equipment, and supporting materials; facilities; and student achievement outcomes; and

c. A list of institutional improvement activities that took place between May 1, 2016 and August 31, 2016 and documentation that the activities occurred;

The Commission noted that this is the school’s third opportunity to demonstrate that the school is capable engaging in a fundamental component required for demonstration of compliance with accrediting standards, that is, the process of ongoing self-evaluation institutional assessment and improvement planning. A continued lack of response in this matter will call into question the CCI’ eligibility for ACCSC accreditation as the school will have failed to fulfill the responsibility that 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.

8. CCI has not demonstrated that the school’s management has the ability to lead and manage a post-secondary educational institution in compliance with accrediting standards and that the school has appropriate administrative and operational policies and procedures in place (Section I (A)(1), Substantive Standards, Standards of Accreditation).

- Renewal On-site Evaluation: The on-site evaluation team observed that Sherry Pruett, the Campus Director, was considered responsible for the oversight of the daily operation of the institution at that time, in August 2015. She had been with the school since June 2001 and responsible for the oversight of numerous areas of the operation of the school during her tenure. In addition, the school’s owner and Executive Director, Brigitte Illingworth, worked with Ms. Pruett to manage the institution. The on-site evaluation team noted that Ms. Pruett has been undergoing treatment for cancer at intervals over the most recent term of accreditation. She was receiving chemotherapy and therefore unable to provide assistance to the team throughout the duration of the on-site evaluation due to her medical condition. The on-site evaluation team observed that in Ms. Pruett’s absence, Ms. Illingworth and the remaining management staff seemed to lack sufficient knowledge of school operations and/or accrediting standards to be able to provide adequate responses to team questions.

- School Action Letter dated April 11, 2016: Upon consideration of the October 22, 2015 TSR and the school’s response to that report, the Commission noted CCI’s inability to address the findings enumerated by the on-site evaluation team raised questions regarding the management’s ability to operate the school in compliance with accrediting standards.

- Unannounced On-site Evaluation: During the on-site evaluation, the team observed that even though Ms. Pruett has not been present at the school on a regular basis for a few years, all of the staff relies on her for almost every managerial/administrative task and are under the impression that she had everything under control. It appears that the amount of time Ms. Pruett has been away from the school the past few years because of her illness, coupled with her high level of responsibility for administering the key managerial functions, had a great impact on school operations. However, there does not appear to have been any training, succession planning, or support put into place over the past five years to ensure Ms. Pruett’s responsibilities were covered during her absences. Even though Ms. Illingworth is the owner/Executive Director and is at the school on a daily basis, it is clear that there has been a lack of overall leadership at CCI for some time. Ms. Illingworth and the remainder of the management staff seem engaged; however, appear to lack fundamental knowledge to run a post-secondary institution in compliance with state, federal, and ACCSC regulations.

- CCI Response to the May 12, 2016 TSR: Subsequent to the on-site evaluation and prior to the school’s response, Ms. Pruett passed away. The response indicates that

CCI is managed by Brigitte Illingworth, Owner and Cora Bravo, Assistant Director. As the management team over the institution, we have implemented policies and procedures for many years that we continue to follow, revise and improve. We have sought out guidance and support from a compliance and accreditation advising firm for training and review of state and accreditation requirements and legal assistance with Title IV requirements, since the ACCSC visit in April 2016. With our history of compliance prior to Ms. Pruett’s illness, training and support from staff, faculty and outside partners CCI will continue to make operational improvements to meet and exceed standards on an ongoing basis.
The response acknowledges that a “thorough review and updates are needed to ensure compliance and timely reporting.” CCI indicated that the focus for managers since the unannounced on-site evaluation in April 2016 have been working with the CPA to finalize the audited financials, hosting a compliance audit, and an unannounced on-site evaluation by the BPPE. The response describes the professional development activities that Ms. Illingworth and Ms. Bravo plan to attend in the next quarter, as follows:

- July 20, 2016 – Bureau for Private Postsecondary Education Compliance Workshop
- July 26, 2016 – ACCSC Best Practices in Accreditation - 2016 Series
- July-August 2016 – California Association of Private Postsecondary Schools Director Boot Camp
- September 21-23, 2016 – ACCSC Professional Development Conference

The Commission is interested in following up on the results of the on-site evaluation conducted by BPPE and the professional development activities described. Therefore, the school must provide the following:

a. A copy of any correspondence or notifications of findings in regard to the unannounced visit conducted by the California BPPE, and

b. Copies of certificates or other confirmation that Brigitte Illingworth and Corlita Bravo completed the professional development activities listed above.

The Commission recognizes the void in management left by the illness and death of Sherry Pruett and therefore has afforded the school repeated opportunities to make the changes necessary to demonstrate compliance with standards. Based on the school’s responses to the findings of renewal of accreditation on-site evaluation team and the unannounced on-site evaluation, school managers have not demonstrated the ability to lead and manage CCI in compliance with accrediting standards. The Commission’s concern in this regard has only deepened with each additional opportunity that has been afforded the institution and the way in which the Commission has very clearly specific the information needed to demonstrate compliance, only to have the school managers fail to provide the information as required.

The school’s managers also have yet to show that compliance with accrediting standards and improvements within the school are due primarily to CCI’ internal efforts rather than due to an on-site evaluation by an outside team or Commission action. The Commission noted the school’s tendency to provide reactive responses rather than proactive responses. As an example, the school decided to cease accepting diplomas from EBHS-Santa Monica in response to the question raised by the on-site evaluation. Instead, the school decided to enroll students on an ability-to-benefit basis. When the on-site evaluation team for the unannounced on-site evaluation raised questions with regard to the manner in which the school implemented that program, the school ceased enrolling students on that basis. Another example is the school’s move to cease enrolling students in the middle of a module in reaction to the on-site evaluation team’s finding in this regard. Given this pattern of response, coupled with the finding regarding the school’s lack of assessment and improvement planning activity, the Commission has a strong concern that the school managers do not have the knowledge base required to successfully assess and implement effective change that will ensure ongoing compliance with accrediting standards.
Therefore, the Commission will make a determination regarding the management of the institution in large part, based on the success of the school’s managers in providing:

- Complete and accurate information in response to each item requested as part of this letter and
- Evidence that the school’s managers are capable of assessing school operations and making the required adjustments to ensure compliance with accrediting standards.

Failure to provide complete and cogent evidence of compliance with accrediting standard will create a strong likelihood that the Commission will withdraw the school’s accreditation in accordance with Section VII (P), Rules of Process and Procedure, Standards of Accreditation.

**PROBATION REQUIREMENTS:**

A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in Section IV, Rules of Process and Procedure, Standards of Accreditation.

In accordance with Section X, Rules of Process and Procedure, Standards of Accreditation, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with Section VII (L)(8), Rules of Process and Procedure, Standards of Accreditation, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.

**MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:**

Please refer to Section VII (M), Rules of Process and Procedures, Standards of Accreditation for the maximum timeframe allowed for CCI to achieve and demonstrate compliance with the Standards of Accreditation set forth in this letter. The timeframe to achieve compliance begins as of the date of this letter. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

**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.

CCI 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. 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.

CCI 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 College 360 DMS Submissions 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.

The 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 September 30, 2016. If a response is not received in the Commission’s office on or before September 30, 2016, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact Anne Santalla at asantalla@accsc.org or (703) 247-4532. Please note that 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 Lisa J. Miles at 703.625.4393 or lmiles@accsc.org.

Sincerely,

Michale S. McComis, Ed.D.
Executive Director

c: Joanne Wenzel
California Bureau for Private Postsecondary Education

3 ACCSC has issued the first 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 prior to formulating its response to this letter. More information is available under the Resources section at www.accsc.org.
August 30, 2016

Loyd C. Jones
President/Owner
Jones Hair Design College
305 Highway 16 West
Carthage, Mississippi 39051

Dear Mr. Jones:

At the August 2016 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous decision to continue System-Wide Financial Reporting and to defer the Application for Renewal of Accreditation submitted by Jones Hair Design College (“JHDC”) located in Carthage, Mississippi. Upon review of the June 8, 2016 continued System-Wide Financial Reporting letter and June 9, 2016 Deferral letter and the school’s responses, the Commission voted to place JHDC on Probation with a subsequent review scheduled for ACCSC’s November 2016 meeting. The reasons for the Commission’s decision are set forth below.

Background:

May 2016

At the May 2016 meeting, the Commission considered the continued System-Wide Financial Reporting status and the Application for Renewal of Accreditation submitted by JHDC and voted to defer action on the application to allow JHDC additional time to demonstrate compliance with accrediting standards and to continue the school on System-Wide Financial Reporting. The Commission found that the school’s response to the TSR raised questions about the effectiveness of the school’s efforts in the following areas:

- Lack of conducting an independent third-party employment verification as required;
- Student graduation and employment outcomes;
- Appropriateness of employment classifications and record keeping;
- Student attendance/SAP policies;
- Required ACCSC graduation and employment disclosures; and
- Appropriate credential titling.

Additionally, the school’s response to the System-Wide Financial Reporting indicated continued monitoring in this area was warranted.

August 2016

JHDC’s responses to the June 8, 2016 continued System-Wide Financial Reporting letter and June 9, 2016 Deferral letter were due on July 11, 2016. The school did not respond by that deadline. Therefore, on July 14, 2016 ACCSC issued a letter to JHDC indicating that a $750 late fee was assessed for the delinquent responses.

On July 26, 2016, in response to ACCSC’s late fee letter, JHDC sent ACCSC an e-mail, stating:

I am informing ACCSC about the current status of Jones Hair Design College. Jones Hair Design College have[sic] been working as much as we can to complete these report[sic] and
hope the letter that was sent to the Dept. of Education help[sic] shed some light on our situation. We are in receipt of the email and are working hard to resolve all issues. Please give me a call if you have any questions. Jones Hair Design College is requesting for more time to complete the report. Jones Hair Design is seeking help from Dept of Education [sic] and any information from ACCSC can help as well.

Attached to the email response was a copy of a letter dated June 9, 2016 from Owner/President Loyd C. Jones to the U.S. Department of Education (‘the Department’). In this letter JHDC stated the following:

As of July 1, 2015 Mr. Loyd C. Jones is the Owner of infinity[sic] Career College1. In the process of getting the Name[sic] changed to Jones Hair Design College, getting new bank accounts, and the Letter of Credit, this is when the trouble started. Mr. Loyd Jones and Mr. Ricky.[sic] Jones had been in negotiation for a while now about the change of the name, bank account and the letter of credit.

As of March 2016, the students went on spring break and at this time Mr. Ricky Jones locked the Senatobia Campus doors. Mr. Ricky Jones stated that Mr. Loyd Jones has not paid rent on the building for January, February, and March, and the balance is $10,000. Michelle Hunter-Rhodes advised Mr. Loyd Jones and stated he did not have $10,000 to give Mr. Ricky Jones. At this point no funds are being process[sic] due to the new bank account being established and Mr. Loyd Jones wanted to know how much money was coming in and what bills are being paid. Mr. Ricky Jones made a book and some of the pages were missing to reflex[sic] this information but the book came up missing or misplaced. Mr. Ricky Jones stated he will not keep getting this information together for Mr. Loyd Jones. Mr. Loyd Jones stated that it is not fair for Jones Hair Design College to pay the whole $3500 a month when Mr. Ricky Jones has a Tax Office and Funeral Home in the same building.

Ricky Jones stated that if Mr. Loyd Jones does not complete the following, he will closed[sic] the school.

1. He wants the name to stay- Infinity Career College.
2. He wants 51% of the school to be transferred to his daughter name[sic] (Jones Hair Design College do not want to disclose her name, but Mr. Ricky Jones stated her name.) Ricky Jones stated the reason for this,[sic] is he did not want Mr. Loyd Jones to turn the money off any more.
3. He wants the bank account returned back to the previous bank which is M&F Bank.
4. He stated that the annual financial audit report is due on June 30, 2016 and it has to be completed through him and if 1-3 is not met then the report will not be completed.
5. He will not give Jones Hair Design College access to the Senatobia Student File Folders, the Fame (Federal Student Aid) Software, or the Genesis Software (student attendance, sap reports etc), nor book keeping records. All these items are needed to complete the audit and other reports that are due to ACCSC. Mr. Ricky Jones has taken these computers from the building and out of possession of all employees.

1 The Commission acknowledged this transaction on July 1, 2015 and found that it represented a transfer of ownership interest within an immediate family and was thus excluded from the Commission’s change of ownership review and approval process as described in Section IV (E)(2)(f)(ii), Rules of Process and Procedure, Standards of Accreditation.
Mr. Loyd Jones has tried to negotiate with Mr. Ricky Jones but Mr. Loyd Jones can not[sic] comply with all of Mr. Ricky Jones demands.

As of July 2015, Mr. Ricky Jones always has had access to all the bank record, financial records, tax records, and book keeping. Mr. Loyd Jones only had what Mr. Ricky Jones give[sic] him in form of book.[sic] Mr. Loyd Jones is in the dark about financial report, bank records, tax records, and book keeping. Mr. Loyd Jones does not have access to this information and Mr. Ricky Jones is denying him access to his information.

As of April 2016, Ricky Jones allowed the students at the Senatobia Campus to return to school. As for Jones Hair Design College, we still do not have access to the building. The students are under the supervision of Ricky and Sharon Jones. They are back on their day to day operation. They have theory class and practice floor. Students are completing the program and sign up for state board exam. Jones Hair Design College has not taken any new enrollment until we can come to a solution.

Several attempts have been made to resolve the issues but no progress has been made.

The Commission reviewed the above response and noted that JHDC did not provide a response to any of the previously identified areas of concern in either the Deferral or System-Wide Financial Reporting letters. Moreover, the Commission now finds additional areas of heightened concern in the areas of continuous operation and management of both the main school and the branch location (“JHDC-Senatobia”) in Senatobia, Mississippi (B070570) in light of the school’s response. JHDC is reminded that the main school bears the ultimate responsibility and oversight for compliance of standards with any branch locations and the accredited status of the branch campus is dependent upon the continued accreditation of the main school.2

Based on the foregoing, the Commission directs JHDC to submit the following:

1. JHDC must demonstrate that the school operates providing education and training to students and maintains its ability to and meets its obligations to students on a continuous basis with the exception of regularly scheduled breaks or an approved change of location (Section I(D)(2)(b), Rules of Process and Procedure, Standards of Accreditation). As noted in the school’s letter to the Department of Education, JHDC indicated that as of March 2016 until April 2016, students at the Senatobia campus did not have access to the school as “at this time Mr. Ricky Jones locked the Senatobia Campus doors.” As such, the Commission is concerned that it appears that JHDC-Senatobia may not have been in continuous operation during this time. Therefore, the Commission directs the school to submit the following:
   a. The specific dates JHDC-Senatobia remained closed and unavailable to students;
   b. An explanation as to whether the branch in Senatobia ceased operation for those dates or whether this period represented a regularly scheduled break – if the latter, then JHDC must provide a copy of the school’s catalog showing a regularly scheduled break for this period;
   c. A roster of all students enrolled at the schools and complete student attendance records for each for the period of from January 1, 2016 through August 31, 2016 broken out by each campus and program length; and

2 The main school bears ultimate responsibility for compliance with accrediting standards by its separate facilities (Section VIII (B)(1) & (3), Substantive Standards, Standards of Accreditation).
d. Any other information or documentation JHDC believes will assist the Commission in its review.

2. JHDC must demonstrate that the school has adequate management and administrative capacity and can operate in compliance with accrediting standards, meet its objectives, and fulfill its obligations to students in an ongoing manner (Section I (4)(1), Substantive Standards, Standards of Accreditation). As noted in the school’s letter to the Department, JHDC indicated that “[a]s for Jones Hair Design College, we still do not have access to the building” and that:

   Mr. Loyd Jones is in the dark about financial report, bank records, tax records, and book keeping. Mr. Loyd Jones does not have access to this information and Mr. Ricky Jones is denying him access to his information.

Given the non-response to the previous Deferral letter and this new information that the owner does not have access to the school for which he is responsible, the Commission has great concerns about school management’s ability to effectively run a postsecondary institution given that it appears the owner has been locked out and remains without access to critical financial records.

Based on the forgoing, the Commission directs the school to submit the following:

a. An update on the current operational status of both the main JHDC and branch JHDC-Senatobia campuses and evidence that the owner has access to and control of school operations;

b. A detailed description of the management structure and administrative capacity at the schools and an explanation as to how this structure is adequate to support school operations, student services, educational programs, and to ensure ongoing compliance with accrediting standards;

c. Job descriptions for all directors and management staff members listed on the organizational chart to include the individuals’ qualifications for that particular role, such as appropriate education, training, and experience commensurate with the level of the individual’s responsibilities;

d. A description of the school’s plan to provide ongoing training and development for members of school management and administrative employees that will support their particular roles in the school;

e. An overview on how JHDC management oversees the operations of the JHDC-Senatobia campus;

f. A copy of a completed organizational chart to include the names and titles of all individuals currently employed for both JHDC and JHDC-Senatobia;

g. Documentation of any relevant professional development activities for those listed above since the submission of the Self-Evaluation Report which demonstrates continued professional development in the operation of a postsecondary institution, to include items such as agendas from the training sessions, sign-in sheets, attendance rosters, and certificates of completion;

h. Copy of the current annual budget; and,

i. Any additional information that the school believes will be useful to the Commission in making a determination regarding the school’s compliance with ACCSC’s requirements regarding management and administrative capacity.

3. JHDC failed to submit the required items as outlined in the Commission’s June 8, 2016 Continued System-wide Financial Reporting letter. As such, JHDC has also failed to show that the financial structure of the schools are sound with resources sufficient for the proper operation of the school and the discharge of obligations to its students (Section I (C)(1), Substantive Standards, Standards of
Accreditation). Also, JHDC has failed to demonstrate compliance with all federal government requirements because it is the Commission’s understanding that JHDC is late filing audited financial statements for fiscal year ended December 31, 2015 with the Department (Section I (B)(1)(e)(iii), Rules of Process and Procedure, Standards of Accreditation).

Based on the foregoing, the Commission directs JHDC to submit the following:

a. Audited financial statements for the fiscal year ended December 31, 2015, prepared and submitted in accordance with requirements set forth in ACCSC’s Instructions for the Preparation and Submission of Financial Statements and Related Information available on the ACCSC website at www.accsc.org;

b. Internally prepared financial statements for the nine month period to cover January 1, 2016 to September 30, 2016, also prepared and submitted in accordance with requirements set forth in ACCSC’s Instructions for the Preparation and Submission of Financial Statements and Related Information;

c. A Management Discussion and Analysis (MD&A) examining and explaining the schools’ current financial condition to include:

i. A discussion that address the schools’ financial performance goals and results;

ii. A financial improvement plan to return to profitability;

iii. Anticipated future demands, events, conditions, and trends that may impact the schools; and

iv. Specific comments relative to the schools’ financial position and condition, its revenues and costs, assets and liabilities, and other obligations and commitments;

d. The school’s 2016 budget and budget-to-actual analysis for the nine month period to cover January 1, 2016 to September 30, 2016;

e. An update as to the schools’ current status with the Department to include copies of all correspondence between the schools and the Department; and

f. Any other information or documentation that JHDC believes will assist the Commission in its review of the school’s financial position.

As the main school has not responded to the June 9, 2016 Deferral letter, the Commission requires a response to the following items previously directed in the June 9, 2016 deferral letter:

4. JHDC did not demonstrate that the school submitted required reports within the time frame prescribed in the Rules of Process and Procedure (Section I (H)(1), Rules of Process and Procedure, Standards of Accreditation). JHDC has yet to demonstrate that employment data reported on the 2014 Annual Report has been verified by an independent third party, as required as part of the Self-Evaluation Report (“SER”). JHDC submitted the SER on September 15, 2015 and was notified by ACCSC via e-mail on September 30, 2015, that the results of an independent third-party audit were missing from the school’s SER submission. By letter dated October 5, JHDC explained that the school had chosen Hypercore Solutions as the independent third party verifier. As Hypercore had subsequently gone out of business, JHDC was “in the process” of securing another third-party agency. During the on-site evaluation, conducted on November 3-4, 2015, JHDC had yet to secure a contract with a third-party vendor to conduct the required employment record verification. In the school’s response to the TSR, received April 24, 2016, JHDC indicated that the school has contracted with MMI Data Integrity. It appears the work is scheduled to begin on April 1, 2015 and will take approximately 30 days.
While the Commission recognizes the difficulty posed by Hypercore’s closing, it appears that JHDC took approximately five months to engage an alternate vendor. In absence of the results of a third-party verification of employment records, conducted in accordance with the instructions set forth in the SER, the school has not met its burden to provide complete information upon which the Commission can make a determination with regard to compliance with accrediting standards.

Accordingly, the school is directed to submit the following:

a. Documentation demonstrating that the third-party procured by the school for independent employment verification meets the Commission’s tests to be considered an “Independent” Third-Party as follows:

i. If the independent third-party is one of the two identified by ACCSC in the July 1, 2013 Accreditation Alert, the school only needs to provide the name of that verification company; or

ii. If the school chooses another independent third-party the school must provide the following:

a) A signed attestation from the independent third-party is not affiliated with the school or share any part ownership in the school or its affiliated schools.

b) The independent third-party does not provide any other services to the school.

c) The independent third-party will only report accurate findings through work conducted in an independent manner.

d) The independent third-party understands and applied the classifications defined in item #2 below exactly as stated.

e) A description of the methodology that the verification agency used for the selection of the 50% sample.

f) A description of the methodology that the verification agency used for the verification process.

b. A summary of results for each G&E Chart that includes the following (at a minimum):

i. The total number of students in the sample;

ii. The number of students in each of the categories below and the percentage in each category as defined below:

**Verified as Correct** – A record is classified “verified as correct” when the independent third party finds:

- The same employer as listed in the school’s record;
- The start date listed in the school’s record is within 45 days of the verified start date;
- The verified job title is substantively the same as that listed in the school’s record, using the following illustrative guidelines (examples from an Automotive Technology program):
  - Exact Match - The school employment record matches exactly the verified job title e.g., “Mechanic”;
  - Obvious Match - The school employment record states “Mechanic” and the verified job title of, “Auto Mechanic” is an obvious match; or
- Confirmed Match - The school employment record states “Mechanic” but the verified job title is “Technician II” and the employer or graduate confirm that the job responsibilities are substantively the same.

**Verified but Different** – A record is classified “verified but different” when the independent third party finds:

- A start date that is more than 45 days different from the start date in the school’s employment record; or
- A substantively different job title from that in the school’s employment record (i.e., any job title that is verified to be different from the school’s employment record and is not an obvious match or confirmed match as described above)

**Unable to Verify** – A record is classified “unable to verify” when the independent third party is unable to obtain verification of the school’s employment record from either the employer or the graduate; and

**Verified as Not Correct** – A record is classified “verify as not correct” when the independent third party finds any of the following:

- The graduate is not found in employer’s records;
- The graduate’s initial employer is different than the employer listed in the school’s employment record;
- The graduate denies having worked in the position as stated in the school’s employment record;
- The position listed in the school’s employment record is unpaid or an intern/externship; and
- Other discrepancies that render the school’s employment record as incorrect.

iii. The following chart completed for each program:

<table>
<thead>
<tr>
<th>Annual Report Year</th>
<th>Program Title (Credential)</th>
<th>Length of Program (Months)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Total Number of Students Sampled</th>
<th>Total Number of Available Students To Sample*</th>
<th>Sample Size Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Verified as Correct</th>
<th>Verified but Different</th>
<th>Unable to Verify</th>
<th>Verified as Not Correct</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* Students classified as Graduates - Employed in Field in program
## Placements Verified by a Different Independent Third-Party*

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Number of Graduates Verified</th>
</tr>
</thead>
</table>

* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”

### c. The following chart completed with the aggregate institutional results across all programs:

#### Independent Third Party Initial Employment Verification

<table>
<thead>
<tr>
<th>Reported Institutional Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Annual Report Year</td>
</tr>
</tbody>
</table>

| Total Number of Students Sampled | Total Number of Available Students To Sample* | Sample Size Percentage |

| Verified as Correct | Verified but Different | Unable to Verify | Verified as Not Correct |

* Students classified as Graduates - Employed in Field across all programs for Annual Report year

### Placements Verified by a Different Independent Third-Party*

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Number of Graduates Verified</th>
</tr>
</thead>
</table>

* Graduates that were unable to be verified by the school’s chosen vendor but were verified by a different third-party company like “The Work Number.”

### d. Any additional information or response the school deems appropriate regarding the above results.

5. JHDC must demonstrate successful student achievement by maintaining acceptable rates of student graduation and employment in the career field for which the school provided education and supporting these rates through the school’s verifiable records of initial employment of its graduates or other verifiable documentation (Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation). In response to the on-site evaluation team’s finding in this regard, the school provided updated Graduation and Employment Charts prepared using a February 2016 Report Date, reporting the following student achievement rates:

<table>
<thead>
<tr>
<th>Program</th>
<th>Length in Months</th>
<th>School Graduation Rate</th>
<th>ACCSC Benchmark Graduation Rate</th>
<th>School Employment Rate</th>
<th>ACCSC Benchmark Employment Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Barber/Hairstyling</td>
<td>11</td>
<td>57%</td>
<td>55%</td>
<td>50%</td>
<td>68%</td>
</tr>
<tr>
<td></td>
<td>15</td>
<td>50%</td>
<td>51%</td>
<td>0%</td>
<td></td>
</tr>
</tbody>
</table>
The graduation and employment rates highlighted above fall below ACCSC’s student achievement benchmark rates. The Commission took note that this is the program in which most of the school’s student enroll; however, JHDC did not provide an assessment of the factors impacting the rates of student graduation (e.g., admissions requirements and student support) and graduate employment (e.g., economic conditions), how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies. The Commission took note that the program does not have a history of low student achievement outcomes and as such is interested in affording the school an additional opportunity to provide updated student achievement data. If the rates in the program continue to fall below benchmark, then the Commission expects the school to conduct a rigorous assessment of student achievement in the Barber/Styling program, to determine the factors impacting the rates of student graduation and graduate employment, and to develop appropriate strategies to address those factors.

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


b. For each Graduation and Employment Chart submitted, provide supporting summary information for the graduation and employment data organized according to the corresponding cohort start date reported on the chart (line #1) as follows:

i. For each student reported provide the following information:

<table>
<thead>
<tr>
<th>Student Name</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Withdrawal/ Termination Date</th>
</tr>
</thead>
</table>

ii. For each student classified as “Unavailable for Graduation” (line #6), provide the following information:

<table>
<thead>
<tr>
<th>Student Name</th>
<th>Program</th>
<th>Start Date</th>
<th>Reason Unavailable</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
</table>

iii. For each graduate reported, provide the following information:

<table>
<thead>
<tr>
<th>Graduate Name</th>
<th>Program</th>
<th>Start Date</th>
<th>Employer Name, Address, &amp; Phone #</th>
<th>Employer Point of Contact</th>
<th>Date of Initial Employment</th>
<th>Descriptive Job Title</th>
<th>Other Status (Unemployed, Further Ed., Unknown, Etc.)</th>
</tr>
</thead>
</table>

iv. For each graduate classified as “Graduates-Further Education” (line #11) or “Graduates-Unavailable for Employment” (line #12), provide the following information:

<table>
<thead>
<tr>
<th>Graduate Name</th>
<th>Program</th>
<th>Start Date</th>
<th>Classification on the G&amp;E Chart</th>
<th>Reason</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
</table>

3 Section VII (B)(1)(b)(ii), Substantive Standards, Standards of Accreditation and Appendix VII - Student Achievement Rates.
c. For each program for which the reported rates of student graduation and graduate employment do not meet the ACCSC benchmark, the school must provide an updated assessment of the factors impacting the rates of student graduation (e.g., admissions requirements and student support) and graduate employment (e.g., economic conditions), how the strategies implemented by the school are intended to target those factors, and how the school is measuring the effectiveness of those strategies.

4. JHDC must be able to justify the classification of each graduate as employed in a training-related field with verifiable employment records using the guidelines set forth in Appendix VII Guidelines for Employment Classification (Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation). According to the TSR, the on-site evaluation team found that employment verification sheets had not been consistently completed and as a result did not consistently include the information required by Appendix VII: graduate name and contact information; date of initial employment; place of employment; employer address and phone number; employer contact person/supervisor; and a descriptive job title and duties. Records for self-employed graduates did not include the required attestation from the graduate that the self-employment is aligned with the individual’s employment goals; is vocational; is based on and related to the education and training received; and that the graduate is earning training-related income.

In response to the TSR, JHDC stated that the school:

“has updated our graduate placement log book to verify grad placement and employment… has had a corporate meeting to train all our employee(s) on each responsibility and job titles…[and has] updated our Graduate Placement Certification to employ the student certify[sic] to have obtained industry related employment and is earning training-related income.”

In addition, the school provided a sample of six placement logs. The Commission noted the following:

- The records for [name redacted] do not appear to be based on written documentation from the student or employer, and do not include a signature of school staff attesting to verbal employment verification with the employer and the graduate;
- The records for [name redacted] indicates that they are self-employed; however, the records do not include an attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received; and that the graduate is earning training-related income; and
- According to the school’s 2015 Annual Report to ACCSC, licensure is required for employment in the state of Mississippi; however, the employment records for [name redacted] indicate that licensure is “pending.”

The Commission determined that the school has yet to demonstrate that records of initial employment include the elements required by Appendix VII, Guidelines for Employment Classification. Therefore, the Commission directs the school to submit the following:

a. A description of the school’s policies and procedures to ensure that written documentation is secured from the graduate or employer to verify a “regular employment” classification.
b. In cases where the school has been unable to secure written documentation from the employer or graduate, a description of the school’s policies and procedures for documenting the school’s diligent efforts to secure written documentation and for maintaining records that include the graduate’s and employer’s name and contact information, b) a signature of school staff attesting to verbal employment verification with the employer and the graduate, and c) the date(s) of verification.

c. A description of the school’s definition of a “reasonable time period,” and “sustainable” employment;

d. A list of the ten most recent graduates classified as “Employed in Field” from the Barbering/Hairstyling program;

e. A copy of the documentation that the school relied upon to classify each graduate requested above in (d.) as “Employed in Field.” The record must be based on written documentation from the student or employer, and must include the signature of school staff attesting to verbal employment verification with the employer and the graduate;

f. A copy of the documentation that the school relied upon to classify each graduate requested above in (d.) as “Employed in Field” who are self-employed. The record must be based on an attestation that the self-employment is aligned with the individual’s employment goals, is vocational, and is based on and related to the education and training received; and that the graduate is earning training-related income;

g. Any other information or documentation JHDC believes will assist the Commission in its review.

5. JHDC must demonstrate that the school maintains a student services program that responds to the individual needs of students and that minimally encompasses student retention strategies suited to the school’s programs particularly with respect to attendance advising (Section VI (A)(3&5), Substantive Standards, Standards of Accreditation). According to the TSR, JHDC maintained minimal evidence that the school engaged students in attendance advising sessions or that the school offered other student services to six students who did not meet the school’s minimum attendance requirements. In response, the school provided a job description for the Student Services Coordinator, completed advising forms for eight students, and sign-in sheets for Guest Speaker presentations on topics such as Customer Services, and Professionalism in the Barber Shop. The Commission found that the response did not provide specific information about how JHDC supports student attendance, and therefore directs the school to provide the following:

a. A description of the school’s policies and procedures for assisting and advising students that are not making satisfactory progress in terms of attendance or academics;

b. A list of currently enrolled students, indicating which students are currently not meeting the school’s attendance or academic performance requirements;

c. A copy of the school’s attempts to advise and assist each student that is not meeting the school’s attendance or performance requirements; and

d. Any other information or documentation that JHDC believes will assist the Commission in its review.

6. JHDC must demonstrate that the school discloses, minimally, the graduation and graduate employment rate for each program offered as last reported to the Commission (Section IV (C)(3), Substantive Standards, Standards of Accreditation). According to the TSR, at the time of the on-site
evaluation, the ACCSC graduation and employment rates reported on the school’s website were from the 2013 Annual Report. Although the school was providing students with a disclosure form titled “How We’re Doing,” the completion and employment rates are not those last reported to the Commission. In response, JHDC indicated that the school is “…working diligently on our website” and that the school “will publish our website on Monday, April 11, 2016.” In absence of documentation that the website has been updated, the school has yet to demonstrate that the appropriate rates are disclosed as required. Therefore, the Commission directs the school to submit the following:

a. A screenshot(s) of the school’s website with the most recently reported graduation and employment rates;

b. An updated copy of the “HOW OUR STUDENTS ARE DOING” demonstrating that the graduation and employment rates most recently reported to the Commission are disclosed, and;

c. Any other information or documentation that JHDC believes will assist the Commission in its review.

7. JHDC must demonstrate that the credential document awarded to graduates accurately identifies the school’s program of study (Section VII (A)(3)(i), Substantive Standards, Standards of Accreditation). The on-site evaluation team noted that the diplomas awarded to graduates did not disclose the correct number of hours in the program or the program’s name. In response, the school provided copies of diplomas that include a typographical error in listing the name of the program: “Baber[sic]/Hairstyling.” The Commission directs the school to revise the diploma to reflect the correct spelling of the program name, and to submit a copy of the corrected credential.

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. **Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.**

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in Section IV, Rules of Process and Procedure, Standards of Accreditation.

In accordance with Section X, Rules of Process and Procedure, Standards of Accreditation, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with Section VII (L)(8), Rules of Process and Procedure, Standards of Accreditation, a school subject to a Probation Order must inform current and prospective students that the school has been
placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.

**MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:**

Based on Section VII (M), Rules of Process and Procedures, Standards of Accreditation and the school’s longest program of 15 months, the maximum timeframe allowed for JHDC to achieve and demonstrate compliance with the Standards of Accreditation is eighteen months. Thus, the timeframe to achieve compliance begins as of the date of this letter and ends on February 28, 2018. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

**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.

JHDC 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. 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.

JHDC 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 College 360 DMS Submissions 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.

As stated in the July 1, 2016 Accreditation Alert, at the Commission’s discretion a $1,000 processing fee is assessed when a school is placed on Probation. Accordingly, the school will receive an invoice, under separate cover, in the amount of $1,000. 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 September 30, 2016.

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4 ACCSC has issued the first 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 prior to formulating its response to this letter. More information is available under the Resources section at www.accsc.org.
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 September 30, 2016, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact Anne Santalla at asantalla@accsc.org or (703) 247-4532. Please note that 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 Erik Embrey at 703.247.4512 or eembrey@accsc.org.

Sincerely,

Michale S. McComis, Ed.D.
Executive Director

c:        Shawanna Carter
          Director

          Sharon Jones
          Director
          Senatobia Branch Campus (B070570)

          Kim Verneuille
          Mississippi Commission on Proprietary Schools and College Registration

          Sondra Clark
          Administrator
          Mississippi State Board of Barber Examiners

          David Derrick
          Executive Director
          Mississippi Board of Cosmetology
August 30, 2016

Sharon Jones
Director
Jones Hair Design College
562 West Main Street
Senatobia, Mississippi 38668

Dear Mrs. Jones:

At the August 2016 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the deferral response and letter submitted to the U.S. Department of Education (“the Department”) by Jones Hair Design College’s (“JHDC-Carthage”) (M054614) located in Carthage, Mississippi. Upon review of the matter, the Commission voted to place JHDC-Carthage on Probation with a subsequent review scheduled for ACCSC’s November 2016 meeting. Accrediting standards state that the accredited status of the branch campus is dependent upon the continued accreditation of the main school (Section VIII (B)(3), Substantive Standards, Standards of Accreditation). Given that JHDC-Senatobia is a branch campus of JHDC-Carthage and the grounds of the Probation Order involve both campuses, the Commission finds that concurrent action is warranted for the branch campus.

Therefore, the Commission voted to place Jones Hair Design College (“JHDC-Senatobia”) located in Senatobia, Mississippi on Probation with a subsequent review scheduled for ACCSC’s November 2016 meeting. The reasons for the Commission’s decision are set forth in the August 30, 2016 letter to JHDC-Carthage.

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in Section IV, Rules of Process and Procedure, Standards of Accreditation.

In accordance with Section X, Rules of Process and Procedure, Standards of Accreditation, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.
In accordance with Section VII (L)(8), *Rules of Process and Procedure, Standards of Accreditation*, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.

**MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:**

Based on Section VII (M), *Rules of Process and Procedures, Standards of Accreditation* and the school’s longest program of 15 months, the maximum timeframe allowed for JHDC-Senatobia to achieve and demonstrate compliance with the *Standards of Accreditation* is eighteen months. Thus, the timeframe to achieve compliance begins as of the date of this and ends on **February 28, 2018**. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

**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.

JHDC-Senatobia 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.\(^1\) 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.

JHDC-Senatobia 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 College 360 DMS Submissions 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.

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 **September 30, 2016**. If a response and the certificate of attesting to the accuracy of the information is not received in the Commission’s office on or before **September 30, 2016**, the Commission will consider further appropriate action.

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\(^1\) ACCSC has issued the first 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 prior to formulating its response to this letter. More information is available under the Resources section at www.accsc.org.
For assistance with the password or for any other questions regarding the electronic submission requirements, please contact Anne Santalla at asantalla@accsc.org or (703) 247-4532. Please note that 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 Erik Embrey at (703)247-4512 or eembrey@accsc.org.

Sincerely,

Michale S. McComis, Ed.D.
Executive Director

c:  Shawanna Carter
    Director

   Loyd C. Jones
   President/Owner
   Carthage Main Campus (M054614)

   Kim Verneuille
   Mississippi Commission on Proprietary Schools and College Registration

   Sondra Clark
   Administrator
   Mississippi State Board of Barber Examiners

   David Derrick
   Executive Director
   Mississippi Board of Cosmetology
Dear Ms. Cazares:

At the August 2016 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered its previous action to place Pacific Coast Trade School (“PCTS”) located in Oxnard, California on Probation. Upon review of the June 2, 2016 Commission letter and the school’s response, the Commission voted to continue PCTS on Probation with a subsequent review scheduled for ACCSC’s May 2017 meeting. The reasons for the Commission’s decision are set forth below.

HISTORY OF THE COMMISSION’S REVIEW:

December 2012 Review

At the December 2012 meeting, the Commission considered the cohort default rate information submitted by PCTS. Upon review of the October 25, 2012 Commission letter and the school’s response, the Commission voted to place PCTS on Cohort Default Rate (“CDR”) Reporting. The Commission noted that PCTS’ two-year cohort default rates for fiscal years as released by the U.S. Department of Education (“the Department”) were as follows: 26.3% in 2009 and 26.4% in 2010. In addition, the Commission noted that the school’s official three-year cohort default rate for fiscal-year 2009 was 45.6%.

August 2013 Review

At the August 2013 meeting, the Commission considered PCTS’ Cohort Default Rate Report and voted to continue the school on CDR Reporting. The Commission found that the school appeared to have an appropriate Default Preventions and Management Plan; however, the Commission expressed concern about PCTS’ two-year cohort default rates as well as the three-year cohort default rate of 45.6% for fiscal-year 2009 and draft rate of 35.0% for fiscal-year 2010.

Additionally, the Commission considered the Request for a Good Cause Showing submitted by PCTS. Specifically, PCTS’ request sought the Commission’s permission to apply for a separate facility while subject to Reporting for issues related to financial soundness. Upon review of the July 10, 2013 request, the Commission voted to deny the request.

February 2014 Review

At the February 2014 meeting, the Commission considered PCTS’ Cohort Default Rate Report and again voted to continue the school on CDR Reporting. The Commission found that the school’s three-year cohort default rates as released by the Department for fiscal years 2009 and 2010 exceeded 50.0%. In its response, PCTS indicated that the school filed an economically disadvantaged appeal with the Department based on the school’s fiscal year 2011 two-year cohort default rate.
Subsequently, the Commission received a copy of the Department’s February 20, 2014 notice to the school stating that the economically disadvantaged appeal was denied, and the April 25, 2013 notice that PCTS lost eligibility to participate in the federal student financial aid programs.

**November 2014 Review**

At the November 2014 meeting, the Commission reviewed the Application for Renewal of Accreditation, Cohort Default Rate Report, employment verification information, and the fiscal year 2013 audited financial statements, interim financial statements, and the school’s responses. The Commission voted to issue a Warning Order based on concerns related to the PCTS’ financial structure, employment verification policies and procedures, and admissions processes for enrolling ability to benefit students. Additionally, the Commission also reviewed an anonymous complaint and voted to forward the complaint to the school for its own review and action.

**May 2015 Review**

At the May 2015 meeting, the Commission voted to continue PCTS on Warning based on concerns related to PCTS’ financial structure. The Commission noted that the school’s financial improvement plan to return to profitability provided positive results but also that the financial position of the school was not yet wholly sound.

**November 2015 Review**

At the November 2015 meeting, the Commission considered its previous action to continue PCTS on Warning and again voted to continue the school on Warning. Specifically, ACCSC found that the school did not alleviate all of the Commission’s concerns regarding the financial soundness of the school. Additionally, the Commission considered the school’s Request for a Waiver of a Standard or Policy in order to permit the school to change location while operating under a Warning Order and voted to grant the waiver.

**May 2016 Review**

At the May 2016 meeting, the Commission considered its previous action to continue PCTS on Warning and voted to place the school on Probation. The Commission determined that PCTS must demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to its students.

**August 2016 Review and Action**

PCTS must demonstrate that the financial structure of the school is sound, with resources sufficient for the proper operation of the school and discharge of obligations to its students (Section 1 (C)(1), Substantive Standards, Standards of Accreditation). In response to the June 2, 2016 Commission letter, PCTS provided revised audited financial statements for the fiscal years ended December 31, 2015 and 2014. Upon review of this information, the Commission found the following positive changes:

- PCTS increased its cash reserves in the amount of $84,477:
  - Cash in Bank as of December 31, 2014: $14,525
  - Cash in Bank as of December 31, 2015: $99,002 instead of the previous $0 as of December 31, 2015;
PCTS decreased its net working capital deficit in the amount of $82,676:
  o As of December 31, 2014: $195,014 ($387,645 current assets to $582,659 current liabilities)
  o As of December 31, 2015: $112,338 ($326,361 current assets to $438,699 current liabilities)

PCTS recorded a net increase in cash in the amount of $6,710:
  o As of December 31, 2014: $77,767
  o As of December 31, 2015: 84,477; and

Note 8 – Notes Payable (p. 11) indicates that at the time of the original release of the audit, PCTS was renegotiating outstanding liabilities to the procurement director and the landlord. The school wrote checks to cover the liabilities and recorded them in accounts payable on the balance sheet which resulted in a bank overdraft, but they were held. The negotiations resulted in installment note payables with monthly payments starting in January 2017 and bearing no interest.

Although the comparative 2014-2015 financial statements show some positive trending as described above, the internally prepared financial statements covering the five-month period of January 1, 2016 through May 31, 2016 provided by PCTS, show that although the school recorded net income of $33,695, PCTS is still operating with a sizable net working capital deficit in the amount of $211,522 ($335,557 current assets to $547,079 current liabilities) and negative equity in the amount of $119,074.

In the school’s Management Discussion and Analysis (“MD&A”), PCTS highlighted that since losing Title IV funding for high Cohort Default Rates in 2014, the school has been able to continue operations for two years without federal funding; moved to facilities with affordable rent, lower utilities, and less maintenance; reduced staff to coincide with the lower student enrollment while reducing expenditures; and as of January 24, 2015, maintained a 12.3% draft Cohort Default Rate. PCTS stated that the school will continue to implement and update strategies in its financial stability plan to return to profitability.

The school’s fiscal year 2016 budget projects net income in the amount of $173,236, as of December 31, 2016. The 2016 budget also shows projections for net income in the amount of $69,316, as of May 31, 2016. The Commission noted, however, that the budget-to-actual for the five-month period of January 1, 2016 to May 31, 2016 only shows net income in the amount of $33,695, which is already $40,921 under budget.

In addition, PCTS provided documentation showing that the school resubmitted its Reinstatement Application to participate in federal student financial aid to the U.S. Department of Education (“the Department”) on May 27, 2016. On the same date, a representative from the Department again requested additional information needed in order to move forward in the application process.

While the Commission recognized the continuing efforts being made by PCTS, based on the review of the financial information provided and the uncertainty of the school’s ability to participate in federal funding programs, the Commission remains interested in ensuring that the school is operating in compliance with accreditation requirements for financial soundness. As such, the Commission voted to continue PCTS on Probation and directs the school to submit the following:

a. Audited and comparative financial statements for the fiscal year-end December 31, 2015 and December 31, 2016 prepared in accordance with requirements set forth in ACCSC’s Instructions for the Preparation and Submission of Financial Statements and Related Information;
b. An updated MD&A narrative examining and explaining the school’s current financial condition and ability to project future financial soundness;

c. The school’s fiscal year 2017 budget and a budget-to-actual analysis for the three month period of January 1, 2017 to March 31, 2017;

d. An update on the school’s current status with the Department including copies of any correspondence from the Department regarding the school’s eligibility to participate in federal student financial aid programs; and

e. Any other information or documentation that the school believes will assist the Commission in its review of the school’s financial position.

TEACH-OUT PLAN REQUIREMENT:

Given the continued serious nature of the issues outlined herein, the Commission directs the school to provide an updated ACCSC Institutional Teach-Out Approval Plan which must be submitted as part of the response for the items listed above.

PROBATION REQUIREMENTS:

In cases where the Commission has reason to believe that a school is not in compliance with accreditation standards and other requirements, the Commission may, at its discretion, place a school on Probation. A school subject to a Probation Order must demonstrate corrective action and compliance with accrediting standards. Failure of the school to demonstrate compliance with accrediting standards or other accrediting requirements by the due date set forth herein may result in a revocation of accreditation action.

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 on Probation. However, a school that is subject to Probation may seek the Commission’s approval for the transfer of accreditation that would result from a change of ownership as described in Section IV, Rules of Process and Procedure, Standards of Accreditation.

In accordance with Section X, Rules of Process and Procedure, Standards of Accreditation, a summary of the Probation Order is made public and provided to the U.S. Department of Education, appropriate State agencies, and appropriate accrediting agencies. Moreover, in accordance with Section X (C)(6), Rules of Process and Procedure, Standards of Accreditation, the Commission has notified the U.S. Department of Education of this action pertaining to the findings related to the school’s federal financial aid responsibilities.

In accordance with Section VII (L)(8), Rules of Process and Procedure, Standards of Accreditation, a school subject to a Probation Order must inform current and prospective students that the school has been placed on Probation and that additional information regarding that action can be obtained from the Commission’s website.
MAXIMUM TIMEFRAME TO ACHIEVE COMPLIANCE:

Based on Section VII (M), Rules of Process and Procedures, Standards of Accreditation and the school’s longest program of 11 months, the maximum timeframe allowed for PCTS to achieve and demonstrate compliance with the Standards of Accreditation is twelve months. Thus, the timeframe to achieve compliance began as of June 2, 2016 and ends on June 2, 2017. Please also be advised that the Commission is under no obligation to wait for the maximum timeframe to expire and may take an adverse action prior to the expiration of the maximum allowable timeframe.

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.

PCTS 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.1 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.

PCTS 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 College 360 DMS Submissions 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.

The school’s response must include a signed certification attesting to the accuracy of the information and be received in the Commission’s office on or before April 14, 2017. If a response and the certificate of attesting to the accuracy of the information is not received in the Commission’s office on or before April 14, 2017, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact Anne Santalla at asantalla@accsc.org or (703) 247-4532. Please note that

1 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 prior to formulating its response to this letter. More information is available under 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 Sean Forman at (703) 247-4505 or sforman@accsc.org.

Sincerely,

[Signature]

Michale S. McComis, Ed.D.
Executive Director

c: Teresita Hacuman
    Joanne Wenzel
Bureau of Private Postsecondary Education