

December 14, 2022

ELECTRONIC DELIVERY

██████████
██████████
American Institute of Alternative Medicine
6685 Doubletree Ave.
Columbus, Ohio 43229

School #M070382
Warning

Dear ██████████

At the November 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the following submitted by American Institute of Alternative Medicine (“AIAM”) located in Columbus, Ohio:

- Application for Renewal of Accreditation;
- Outcomes and Licensure Report;
- Application for Initial Distance Education; and
- Application for the Addition of Non-Degree Program (Medical Assisting-Diploma).

Upon review of the July 6, 2022 Warning Letter and the school’s response, the Commission voted to continue AIAM on **Warning** with a subsequent review scheduled for ACCSC’s May 2023 meeting. The reasons for the Commission’s decision and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commissions Review

- At the February 2016 meeting, the Commission voted to grant the school renewal of accreditation for a period of five years and placed the school on Outcomes and Licensure Reporting for ongoing monitoring of the following:
 - Graduate employment rates for the 12-month Practical Nursing Diploma program and the 15-month Registered Nursing AAS Degree program and
 - Licensure pass rates for the 15- and 18-month Registered Nursing AAS Degree programs.
- At the November 2016 meeting, the Commission voted to continue the school on Outcomes and Licensure Reporting for ongoing monitoring of the following:
 - Graduate employment rates for the 15-month Registered Nursing AAS Degree program and
 - Licensure pass rates for the 15-month Registered Nursing AAS Degree program.
- At the June 2017 meeting, the Commission voted to continue the school on Outcomes and Licensure Reporting for ongoing monitoring of the following:
 - Graduate employment rate for the 15-month Registered Nursing AAS Degree program and
 - Licensure pass rate for the 15-month Registered Nursing AAS Degree program.
- At the August 2018 meeting, the Commission voted to continue the school on Outcomes and Licensure Reporting for ongoing monitoring of the following:

- Graduate employment rates for the 15-month Practical Nursing Diploma program and the Registered Nursing (15 and 24-month AAS) program and
- Licensure pass rates for the 15-month Registered Nursing AAS Degree program, the 24-month Registered Nursing AAS Degree program, and the 15-month Practical Nursing Diploma program.
- At the May 2019 meeting, the Commission directed the school to cease enrollment in the 15- and 24-month Registered Nursing (AAS) program and voted to continue the school on Outcomes and Licensure Reporting for ongoing monitoring of the following:
 - Student graduation rate in the 15-month Registered Nursing AAS Degree program;
 - Graduate employment rates in the 15-month Registered Nursing AAS Degree program, the 24-month Registered Nursing AAS Degree program, and the 15-month Practical Nursing Diploma program and
 - Licensure pass rates for the 15- and 24-month Registered Nursing AAS Degree programs.
- At the February 2020 meeting, the Commission took the following actions to:
 - Continue Outcomes and Licensure Pass Rate Reporting for graduate employment rates and licensure pass rates in the 15- and 24-month Registered Nursing (AAS) Degree programs and refer this matter for review in conjunction with the school's Renewal of Accreditation on-site evaluation;
 - Continue the cease enrollment directive in the 15-month Registered Nursing AAS Degree Program; and
 - Direct AIAM to cap enrollment in the 15-month Practical Nursing Diploma program.
- At the August 2020 meeting, the Commission considered AIAM's request to lift the cease enrollment order on the 15-month Registered Nursing AAS Degree program and for permission to enroll students beginning in the Fall 2020 term. The Commission voted to implement an enrollment cap and to limit AIAM to enroll only up to forty (40) new students in the 15-month Registered Nursing AAS Degree program for each enrollment period in the 2020-2021 school year. The Commission also required that the school provide a follow-up report on the student achievement of students enrolled in the 15-month Registered Nursing program.
- At the November 2020 meeting, the Commission considered the school's Application for Renewal of Accreditation and the school's request to lift program enrollment caps for the Registered Nursing AAS Degree programs and Practical Nursing Diploma programs and took the following actions to:
 - Defer final action until the completion of the corresponding on-site evaluation ("COSE");
 - Continue the school on Outcomes and Licensure Reporting to be considered in conjunction with the school's COSE; and
 - Lift the enrollment caps on the Registered Nursing and Practical Nursing programs
- At the May 2022 meeting, the Commission considered the school's Application for Renewal of Accreditation, Outcomes and Licensure Reports, and recent evaluation reports. Upon review of the March 18, 2022 Corresponding On-Site Evaluation Report ("COSER"), which also encompassed the evaluation of the school's initial distance education approval and new non-degree program applications, the Commission voted to place the school on Warning based on the prolonged history of reporting below-benchmark rates of student achievement, particularly in the area of licensure pass rates and graduate employment rates. Specifically, the Commission noted below-benchmark employment rates in the 2-month Phlebotomy, 9-month Practical Nursing, and 27-month Acupuncture (MAc) programs.

November 2022 Review and Action:

AIAM must demonstrate successful student achievement by reporting acceptable rates of student graduation, graduate employment, and pass rates on licensure/certification exams (*Section VII (B)(1)(b), Substantive Standards, Standards of Accreditation*). Using a July 2022 Report Date on the Graduation and Employment Charts, the school’s response provided the following student achievement rates for all approved programs.

Program (Credential)	Length in Months	AIAM Graduation Rate	ACCSC Benchmark Graduation Rate	AIAM Employment Rate	ACCSC Benchmark Employment Rate
Acupuncture (MAc)	27	64%	40%	100%	70%
Medical Assisting (Diploma)	9	40%	60%	100%	
Phlebotomy (Certificate)†	2	83%	84%	11%	
Practical Nursing (Diploma)	9	76%	60%	17%	
Registered Nursing (AAS)	15	75%	50%	83%	
Registered Nursing (AAS)††	24	73%	40%	47%	
Medical Massage Therapy (Diploma) ¹	12	58%	55%	71%	

†ACCSC approved the school’s Notice of Discontinued Program form for the Phlebotomy (Certificate) program on September 20, 2022. There are no students remaining in this program, and as such, there is no need for further review of student outcomes.

†† The March 18, 2022 ACCSC Corresponding On-Site Evaluation Report states that the 24-month schedule of the Registered Nursing Program is no longer offered due to the Commission Cease Enrollment Directive and that the school graduated its last student from this schedule in December of 2021. Therefore, no further reporting for this schedule of the Registered Nursing (AAS) Program is required.

Upon review of the updated Graduation and Employment Charts, the Commission noted that the graduation rate for the Medical Assisting (Diploma) program and the employment rate for the 9-month Practical Nursing (Diploma) program fall below ACCSC benchmark rates.² The school’s response outlines an assessment of factors contributing to the below-benchmark rates and details the school’s remediation efforts, as summarized below.

The Practical Nursing (Diploma) Program:

In the most recent response, the school reported below-benchmark rates of graduate employment, and in the 2022 Annual Report, the school reported licensure/certification examination pass rates for the 9-month Practical Nursing (Diploma) program of 33% against a benchmark of 70%. The school identified the following as factors contributing to the below benchmark rates.

Entrance Exam Testing

In response to the Covid-19 pandemic, the school waived the entrance exams requirement for the Practical Nursing program temporarily. When entrance testing became available again, the school accepted test

¹ The school’s response refers to this program as Western Massage Therapy; however, per the April 2, 2021 Commission letter, the Commission approved the school’s Program Modification Report – Non-substantive modification changing the program name to Medical Massage Therapy (Diploma).

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

results from examinations taken at other facilities and/or remotely. The response posits that due to the temporary changes in admissions testing requirements, the school admitted students who may not have met the criterion under normal circumstances.

Additional Admissions Criteria

AIAM's response notes that students enrolling in the Practical Nursing program generally demonstrate difficulty with dosage calculations, which affects student performance. In response to this assessment, AIAM stated the intention to increase the English Language cumulative score to 75% and to incorporate a math assessment into the entrance exam requirements for admissions to gauge whether applicants can demonstrate sufficient aptitude with math to be successful in learning dosage calculations.

Student Academic Integrity

Upon review of the cohorts captured in the July 2022 Graduation and Employment Charts, AIAM noted that the school had uncovered evidence that called into question the integrity of the test scores among the student population, starting in the summer of 2020. The school believed that the abrupt transition to online entrance examinations and distance education learning created opportunities for academic dishonesty that would have otherwise been stifled by the school's regular protocols. Upon review of the entrance examinations against the student grades, the school noted that those entrance examinations taken at another institution – a local community college – did not align with student academic performance after enrollment, which may have been due to academic dishonesty in a remote test-taking environment.

Additionally, the school received an anonymous tip that students may have used “remote testers” involving external members of the local community, which appeared to elude the precautions used by third-party proctoring companies. In response to this discovery, the school brought all entrance and other student examinations back on campus and instituted safeguards, such as assigning seats for test takers, putting parameters around allowable attire during exams, and relying exclusively on AIAM-owned equipment. The school also indicated that it had informed the Ohio State Board of Career Colleges and Schools of its suspicions regarding the foregoing. AIAM stated that the recently implemented policies and procedures have resulted in normalized testing scores, and the school believes its efforts will translate to improved student achievement outcomes.

Licensure and Employment

AIAM's response states that NCLEX testing opportunities were suspended in March 2020, with testing centers reopening in phases starting in May 2020, resulting in limited opportunities for students, who graduated within the reporting period, to achieve licensure and thereby qualify for employment. Additionally, as testing opportunities became available, graduates were waiting, in some cases, a full 5 months between applying to sit for the exam and being able to take the NCLEX. The response goes on to mention that test opportunities have not yet returned to pre-pandemic frequency. The school's response also recognizes that the length of time between graduation and sitting for the NCLEX impacts the graduate's performance on the examination and the likelihood of achieving a passing score. AIAM also noted that in response to the pandemic, the Ohio Board of Nursing instituted a program wherein graduates would be issued a temporary license prior to passing the NCLEX, and these licenses would expire March 21, 2021. Graduates did not have an opportunity “to apply for a permanent license or opt-out of the temporary license” (September 8, 2022 AIAM Response, page 12). A number of graduates received the temporary license for short periods of time, which did not allow the graduates to benefit from the temporary licensure or sufficient time to take the NCLEX, prior to the March 1 program cancellation. The school indicated that the

interruption in licensure appears to have affected graduate employment opportunities as well. Finally, the school included data regarding the Comprehensive Predictor examination (the school’s exit exam) pass rates broken down by cohort for nursing students, which shows a 65.5% average for Practical Nursing students and a 74.55% average for the Registered Nursing students in the Summer 2021 through Spring 2022 cohorts.

While the Commission recognized the school’s extensive assessment particularly regarding academic integrity among nursing students, the Commission noted that employment rates in the 9-month Practical Nursing (Diploma) program once again did not meet benchmark and appear to be trending downward as noted below.

Program	Length In Months	G/E	July 2020 Report Date	July 2021 Report Date	Jan. 2022 Report Date	July 2022 Report Date	ACCSC Benchmark Rates
Practical Nursing (Diploma)	9	G	72%	76%	80%	76%	60%
		E	54%	65%	38%	17%	70%

As such, the Commission remains interested in the effectiveness of the school’s efforts in bolstering student achievement, particularly with NCLEX licensure pass rates and graduate employment.

The Medical Assisting Program:

Upon review of the student achievement rates for the Medical Assisting (Diploma) program, the Commission noted that the school reported a 40% graduation rate, which falls below ACCSC benchmark of 60%. Though the Commission recognized that the cohort represented in the Graduation and Employment Chart using a July 2022 Report Date consisted of 5 total starts and understood that the smaller cohort may have impacted the school’s ability to demonstrate a graduation rate that meets benchmark, the Commission expressed interest in monitoring the Medical Assisting program and learning about the efforts the school has undertaken to improve student achievement rates in this program.

Overall, though the Commission found that the school engaged in significant assessment and has taken several steps to address the issues affecting student achievement in the Practical Nursing program. Despite the history of student achievement and licensure pass rate monitoring and reporting, the Commission found that only two outcomes remain below benchmark. The Commission remains interested in the assessment and resulting actions taken to bolster student achievement in the Medical Assisting (Diploma) program. As such, to provide the school with an additional opportunity to demonstrate the effectiveness of those efforts, the Commission determined that additional monitoring is warranted. However, as previously stated, if the school does not demonstrate improved student achievement outcomes in all of the school’s programs, the Commission is likely to escalate its action to a Probation.

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

- a. A narrative on the school’s efforts relative to the updated admissions procedures and how those procedures are working to ensure academic integrity in the admissions process;
- b. A list of any students identified as having violated the school’s code of conduct relative to academic integrity and brief description of the actions taken by the school relative to the code of conduct;
- c. A description of any remediation or reskilling opportunities made available to students who failed to pass the NCLEX exam;

- d. A list of graduates from the Practical Nursing (Diploma) program for the last six months and contemporaneous employment information, in the following format, grouped by program:

Graduate ID	Program	Start Date	Employer, Contact, Address, & Phone #	Date of Initial Employ	Descriptive Job Title	Other Status (Unemployed, Further Ed., Unknown, Etc.)

- e. A description of the assessment of student achievement in the Medical Assisting (Diploma) and the Practical Nursing (Diploma) programs, the resulting actions taken, and the effectiveness of those efforts;
- f. Graduation and Employment Charts for the 9-month Practical Nursing, and 9-month Medical Assisting (Diploma) programs using **July 2023 Report Date**.
- g. Summary information for the Graduation and Employment Chart(s) organized according to the corresponding **cohort start date** reported on the chart (line #1) as follows:
- i. For each student start, provide the following information:

Count	Student ID	Program	Start Date	Graduation Date	Withdrawal/Termination Date
1	12345	Medical Assisting	01/10/2021	06/01/2021	N/A
2	12346	Medical Assisting	01/10/2021	N/A	07/10/2021

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

Count	Student ID	Program	Start Date	Reason Unavailable	Description of the Documentation on File
1					

- iii. For each graduate classified as employed in the field³ (line #14), provide the following information:

Count	Graduate ID	Program	Start Date	Grad. Date	Employer, Contact, Address, & Ph. #	Date of Initial Employ.	Descriptive Job Title and Responsibilities	Source of Verification ⁴ (i.e., graduate or employer)
1								

- iv. From the list in (iii) above, for each graduate classified as employed in a training related field, that is “self-employed,” provide the following:

Count	Graduate ID	Program	Start Date	Graduation Date	Description of the Documentation on File
1					

- v. From the list in (iii.) above, for each graduate classified as employed in a training related field, that is “Career Advancement,” provide the following:

Count	Graduate ID	Program	Start Date	Graduation Date	Description of the Documentation on File
1					

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

Count	Graduate ID	Program	Start Date	Classification on the G&E Chart	Reason	Description of the Documentation on File
1						

³ See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.

⁴ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.

- h. The licensure pass rate for the graduates represented in the above charts for the Practical Nursing program;
- i. Information or documentation relative to the school's status with the Ohio Board of Nursing; and
- j. Any additional information or data that the school believes will be useful to the Commission in demonstrating the successful achievement of the school's students and graduates.

Warning Restrictions:

Pursuant to *Section VII (K)(9), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Notification to Students

The Commission requires the school to inform current and prospective students in writing that the school has been placed on Warning and to provide a summary of the reasons for the Warning Order (*Section VII (K)(8) Rules of Process and Procedure, Standards of Accreditation*).

Response Requirements:

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

AIAM 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.⁵ 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.

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

Keep in mind, the school's response must be prepared in accordance with ACCSC's Instructions for Electronic Submission (e.g., prepared as one Portable Document Format ("PDF") file that has been prepared using Adobe Acrobat software (version 8.0 or higher) and which has a .pdf extension as part of the file

⁵ ACCSC has issued two modules of the **Blueprints for Success Series** – [Organizing an Effective Electronic Submission](#) and [Preparing a Comprehensive Response for Commission Consideration](#) – which provide a framework for submitting a well-documented, organized, electronic response for Commission consideration. ACCSC encourages the school to review these modules when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

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 June 29, 2023**. If a response, the required fee,⁶ and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before June 29, 2023**, the Commission will consider further appropriate action.

For assistance with the password or for any other questions regarding the electronic submission requirements, please contact [REDACTED]. Please note that any password requests to access College 360 must be made by the school director, or designated member of the school's management team, via e-mail.

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

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

c: [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

⁶ ACCSC assesses a \$500 processing fee to a school placed on Warning.