July 6, 2022

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

Dear [Name]

At the May 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the Application for Renewal of Accreditation, Outcomes and Licensure Report, Application for Initial Distance Education, and Application for the Addition of Non-Degree Program1 submitted by American Institute of Alternative Medicine (“AIAM”) located in Columbus, Ohio. Upon review of the March 18, 2022 Corresponding On-site Evaluation Report (“COSER”) and the school’s response to that report, the Commission voted to place AIAM on Warning with a subsequent review scheduled for ACCSC’s November 2022 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, with two Reporting Enclosures 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 Reporting for going 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 June 2017 meeting, the Commission voted to continue the school on Reporting for going 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 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.

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1 Phlebotomy (Certificate)
Medical Assisting (Diploma)
• At the May 2019 meeting, the Commission directed the school to cease enrollment in the 15- and 24-month Registered Nursing program and voted to continue the school on 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.

• 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”) 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 Report, and recent evaluation reports. Upon review of the March 18, 2022 COSER (which also encompassed the evaluation of the school’s initial distance education approval and new non-degree program applications). The Commission also considered the school’s request to lift program enrollment caps for the Registered Nursing AAS Degree program and the Practical Nursing Diploma program. Upon review of the record in this matter, the Commission voted place AIAM on Warning for a prolonged history of reporting below-benchmark rates of student achievement, particularly in the area of licensure pass rates and graduate employment rates.

**Current Meeting Review and Action:**

1. 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*). The school is currently approved by ACCSC for six programs. Two of those programs – Medical Assisting and Medical Massage Therapy – were approved in 2020 and have not been operational long enough to be reportable via the Graduation and Employment Chart reporting formula. For the remaining four programs, the Commission found the following regarding student achievement outcomes.
Practical Nursing Diploma Program:

The school reported below-benchmark rates of graduate employment, and in some cases licensure/certification examination pass rates, on for the 15-month schedule of the Practical Nursing Diploma program with each Annual Report from 2017 through 2020. With the 2021 Annual Report, the reported rates of graduation, employment and licensure that meet ACCSC’s benchmarks.

The school implemented a 9-month schedule, which first became reportable via the Graduation and Employment Chart formula with the 2021 Annual Report. The school reported a graduate employment rate of 67%, which although below benchmark, represented improvement over the previous four years of reporting in the 15-month version. The school was afforded an opportunity to show a continued upward trend in the program; however, the rates reported using a January 2022 Report Date showed a significant decline. The school also reported a significantly improved employment rate for the 15-month version of the program in the 2021 Annual Report. The Commission is interested as to whether its previous action to direct the school the cease enrollment in the 15-month schedule of this program was an underlying factor in that improvement.

<table>
<thead>
<tr>
<th>Length Mos.</th>
<th>Student Achievement Rates</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Jan-22</th>
<th>Benchmark Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>9</td>
<td>Graduation</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>76%</td>
<td>80%</td>
<td>60%</td>
</tr>
<tr>
<td></td>
<td>Employment</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>67%</td>
<td><strong>38%</strong></td>
<td>70%</td>
</tr>
<tr>
<td></td>
<td>Licensure Exam Pass</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>95%</td>
<td>N/A</td>
<td>70%</td>
</tr>
<tr>
<td>15</td>
<td>Graduation</td>
<td>58%</td>
<td>85%</td>
<td>72%</td>
<td>71%</td>
<td>73%</td>
<td>N/A</td>
<td>50%</td>
</tr>
<tr>
<td></td>
<td>Employment</td>
<td><strong>63%</strong></td>
<td><strong>50%</strong></td>
<td><strong>56%</strong></td>
<td><strong>56%</strong></td>
<td>82%</td>
<td>N/A</td>
<td>70%</td>
</tr>
<tr>
<td></td>
<td>Licensure Exam Pass</td>
<td><strong>68%</strong></td>
<td><strong>55%</strong></td>
<td><strong>81%</strong></td>
<td><strong>86%</strong></td>
<td>91%</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

With regard to the 38% employment rate in the 9-month schedule of the program cited in the COSER, AIAM stated “[t]he pandemic did impact our acupuncture and practical nursing program.” (April 15, 2022 response, 18th page). The school explained that NCLEX testing shut down for a few months and then opened for limited availability due to pandemic protocols. The response does not identify the specific timeframe and graduate population that would have been affected by the inaccessibility of NCLEX testing.

AIAM also described the loss of clinical opportunities with healthcare facilities since April 2020. The school created simulation opportunities, approved by the Board of Nursing, at the school to provide students with the hands-on portion of the program; however, the school found that employers prefer hiring nurses that have hands-on experience with patients. According to the response, the school is “now back in multiple facilities for that important hands-on piece.” The Commission is interested in reviewing contemporaneous data from the recent cohorts to evaluate whether the ability to complete hands-on clinical training improves the graduation rates in this program.

Upon reviewing the five-year history of Annual Reports, as well as the updated data provided in the January 2022 Graduation and Employment Chart, the Commission found that the school’s strategies have had mixed results in improving the rates of graduate employment for the Practical Nursing program. Although the most recent rates may have been affected by the pandemic, the long history of
below-benchmark outcomes indicates that only a portion of the issue can be attributed to the effects of the pandemic. The Commission is interested in ensuring that the school has conducted a rigorous assessment and is strongly targeting those factors within the school’s control.

**Acupuncture (M.Ac):**

ACCSC approved this 27-month program was approved in May 2016 and first became reportable with the 2020 Annual Report. The school has reported below-benchmark rates of graduate employment since the program was first reportable, as shown in the following table:

<table>
<thead>
<tr>
<th>Length Mos.</th>
<th>Student Achievement Rates</th>
<th>2017</th>
<th>2018</th>
<th>2019</th>
<th>2020</th>
<th>2021</th>
<th>Jan-22</th>
<th>Benchmark Rates</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graduation</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>72%</td>
<td>67%</td>
<td>67%</td>
<td>40%</td>
<td></td>
</tr>
<tr>
<td>Employment</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>58%</td>
<td>67%</td>
<td>67%</td>
<td></td>
<td>70%</td>
</tr>
<tr>
<td>Licensure Exam Pass</td>
<td>N/A</td>
<td>N/A</td>
<td>N/A</td>
<td>64%</td>
<td>100%</td>
<td>N/A</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

According to the school’s response, acupuncturists were particularly affected in placement since most become self-employed and work in close quarters with clients and initially, some graduates from the period covered by the 2020 and 2021 Annual Reports did not want to try and start a practice around the time of the inception of the pandemic. This would appear to support the school’s assertion that the pandemic has been a contributing factor to below-benchmark rates of graduate employment. In addition, the Commission noted the school’s statement that “we have not had a history of issues with acupuncture benchmarks with very few outlier cohorts across the years.” AIAM, however, did not provide other information about the performance of previous programs in the field of acupuncture that might create a context for making a determination about the current Acupuncture program. Given these factors, the Commission is interested in reviewing contemporaneous data regarding the success of students in achieving the vocational objectives of the program (e.g., employment) and in examining any additional contextual student achievement results in previous acupuncture programs that might have bearing on assessing the success of students currently.

**Phlebotomy (Certificate):**

ACCSC approved this 2-month program in June 2020 and the school first reported student achievement outcomes with the 2021 Annual Report. For the reporting period January 2020 to December 2020, the school reported 6 starts and 5 graduates resulting in a graduation rate of 83%, which is below the required benchmark of 84%. The school also reported that none of the five graduates were employed in field, for an employment rate of 0%, which is below the required benchmark rate of 70% for graduate employment. In response to the COSER, the school provided an updated Graduation and Employment Chart with a Reporting Period of July 2020 to June 2021. The reported graduation rate of 93% exceeds the required 84% benchmark rate; however, of the 13 students who graduated and were available for employment, none were employed in field. It appears that AIAM is having success in graduating students from this program but that less so in demonstrating that these graduates go on to work in a training related field.

According to the school’s response, “[t]he placement issue for these students is more complex, and we found the graduates had various reasons for not finding employment.” The school provided a list of all 13 students, and the reasons given for the graduate’s lack of employment in the field. As noted by the school, “[t]hese reasons are not related to the pandemic, but idiosyncratic to the individual students”
Of the 13 students, the school was unable to reach 3 students, and 1 student stopped communicating with the school. In order to improve post-graduation communication with graduates, the school has tasked the Externship Coordinator with building relationships with students during enrollment, and with responsibility for placement assistance. The school also indicated that it has worked to establish relationships with clinical sites that will “help the students become excited about the field and follow up with employment opportunities.” The Commission is interested in monitoring the school’s progress in these initiatives.

The Commission noted that among the reasons given for the lack of employment in-field, four graduates appear to have indicated that they are not interested in employment as a Phlebotomist, two are only interested in part-time employment, one is uncomfortable with current skill-level, and one wasn’t offered an interview due to a lack of English language speaking skills. In reviewing these particular notes, the Commission did raise a question with regard to the admissions process and if the school is clearly disclosing to students the name, nature, and level of occupation for which training is provided, and also questions whether the admissions policies and procedures contribute to identifying prospective students that are capable of completing the training offered and achieving success.

**Registered Nursing (AAS):**

The school reported below-benchmark rates of graduate employment and pass rates on licensure/certification exams for the 15-month schedule of the Registered Nursing AAS Degree program with each Annual Report from 2017 through 2020. For the 24-month schedule of this program, the school reported below-benchmark rates of graduate employment on each Annual Report from 2017-2020, and below-benchmark pass rates on licensure/certification exams in the 2017 and 2018 Annual Reports.

With the 2021 Annual Report, the 15-month version of this program reported rates of graduation, employment, and licensure examination passing scores that exceed ACCSC’s benchmark rates. The 24-month version of this program reported rates of graduation and licensure examination passing scores and a graduation employment rate of 69%, which falls slightly below the 70% benchmark rate. The Commission noted the improvements in student success in this program and is interested in ensuring that the school maintains successful student achievement in this program.

Overall, the Commission found that while there are signs of improvement, the Acupuncture and Phlebotomy programs have yet to establish a track record of graduates successfully achieving the vocational objectives of the program. While the Commission is persuaded that Acupuncture graduates have been impacted by the pandemic, the school must provide additional information about the ways in which student success is supported in the Phlebotomy program. The school has historically reported below-benchmark rates in the 15-month Practical Nursing program and recently has been able to show improvement in student success; however, the newer 9-month schedule of the program is now reporting below benchmark rates. Moreover, although the Registered Nursing program has shown recent improvements in the rates of student achievement, in context of the overall performance of the school in this area, the Commission determined that additional monitoring is warranted for this program as well given its history.

Accordingly, the Commission directs AIAM to submit the following:
a. An assessment and identification of the key factors the school believes are impacting the graduate employment rate in all schedules of the Practical Nursing Diploma program, a description of the strategies being implemented by the school to address and overcome those factors, and an explanation of how the strategies are designed to target the factors identified in the assessment.

b. For the Acupuncture (MAc) program, provide a description of the performance of the school’s previous programs relative to student achievement success and how that correlates to projected student success in the current program.

c. An Admissions Study and assessment of how the school represents the vocational outcomes of the Phlebotomy program and whether the school’s admissions practices contribute to identifying prospective students that are capable of completing the training offered and achieving success.

d. A description of any areas for improvement identified during the school’s assessment process to support successful achievement and a description of the results of those improvements.

e. A list of graduates from the Practical Nursing (Diploma) program, the Acupuncture (MAc), and the Phlebotomy (Certificate) programs for the last six months and contemporaneous employment information, in the following format, grouped by program:

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

f. Graduation and Employment Charts for each program that has been operational long enough to be reportable using **July 2022 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:

<table>
<thead>
<tr>
<th>Count</th>
<th>Student ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Withdrawal/Termination Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>12345</td>
<td>Cosmetology</td>
<td>01/10/2021</td>
<td>06/01/2021</td>
<td>N/A</td>
</tr>
<tr>
<td>2</td>
<td>12346</td>
<td>Cosmetology</td>
<td>01/10/2021</td>
<td>N/A</td>
<td>07/10/2021</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Count</th>
<th>Student ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Reason Unavailable</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

iii. For each graduate classified as employed in the field² (line #14), provide the following information:

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Employer, Contact, Address, &amp; Ph. #</th>
<th>Date of Initial Employ</th>
<th>Descriptive Job Title and Responsibilities</th>
<th>Source of Verification³ (i.e., graduate or employer)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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:

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
</table>

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² See Appendix VII – Guidelines for Employment Classification, Standards of Accreditation.
³ Appendix VII (4) – Guidelines for Employment Classification, Standards of Accreditation requires the school to verify the employment classification.
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:

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</th>
<th>Program</th>
<th>Start Date</th>
<th>Graduation Date</th>
<th>Description of the Documentation on File</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>Count</th>
<th>Graduate ID</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>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

h. 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.

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**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. 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

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4 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.acsc.org.
the institution to access the Annual Report Portal is the same to access the School Submission section of the College 360 database. The Instructions for Electronic Submission can be found here. A detailed overview on how to upload a school submission can be found here.

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

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 8, 2022. 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 8, 2022, 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] or [redacted]

Sincerely,

[Redacted]

Michale S. McComis, Ed.D.
Executive Director

c: [Redacted]

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