



Accrediting Commission of Career Schools and Colleges

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November 16, 2022

ELECTRONIC DELIVERY

██████████
██████████

Palm Beach Academy of Health & Beauty
1220A 10th Street
Lake Park, Florida 33403

School #M070645
Continued Warning

Dear ██████████

At the November 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” or “the Commission”) considered the December 2, 2021 complaint submitted by ██████████ against Palm Beach Academy of Health & Beauty (“PBAHB”) located in Lake Park, Florida. Upon review of the Commission’s August 29, 2022 Warning Order and the school’s response, the Commission voted to **continue PBAHB on Warning** with a subsequent review scheduled for ACCSC’s February 2023 meeting. The Commission also considered the Admissions Report submitted by PBAHB, upon review of the Commission’s May 13, 2022 letter and the school’s August 23, 2022 Admissions Report, the Commission voted to **continue PBAHB on Admissions Reporting**. The reasons for the Commission’s decisions and the Commission’s requirements for the school to demonstrate compliance are set forth below.

History of the Commission’s Review:

Complaint Review History

ACCSC received a complaint submitted by ██████████ dated December 2, 2021 against PBAHB located in Lake Park, Florida. The complaint alleges that PBAHB may not be in compliance with the Commission’s standards in the areas of instructional materials and equipment, and promotion. The school was directed to submit documentation to the Commission to demonstrate compliance in the aforementioned areas. The school was required to submit a narrative response to ██████████ allegations, a copy of any complaints ██████████ filed with the school, a complete list of all training/instructional aids for the complainant’s cohort, a copy of the policy and procedures to ensure recruitment personnel do not make misleading statements regarding the school’s personnel and faculty, a record of the most recent recruitment training, a description of any remedy offered to ██████████ and the status of any such offer, and any other supporting documentation.

In response to the Commission’s initial December 29, 2021 letter, the school provided two responses dated February 3, 2022 and February 6, 2022. ACCSC determined the responses appear to be missing the requested list of textbooks and publication dates for the Hemodialysis Technician program, as well as documentation regarding the sufficiency of the equipment. Furthermore, additional information was required regarding faculty qualifications, the roles and responsibilities of staff in the area of recruitment, and the school’s complaint policy and procedure. As a result of the school’s February 3, 2022 and February 6, 2022 responses, ACCSC determined that additional information was necessary pertaining to the following areas: instructional materials, equipment, recruitment, faculty qualifications, and student complaints.

In response to the Commission’s February 14, 2022 additional information request, the school’s March 1, 2022 response notes that ██████████ was currently on a leave of absence and awaiting an externship placement without providing further explanation of the school’s process and procedure for ensuring that ██████████ would secure an externship. Additionally, the school provided the applicable roles and responsibilities of the admissions personnel, the requested student satisfaction surveys, faculty personnel report, the complaint policy, and an explanation of the school’s adherence to its complaint procedure, an explanation of the sufficiency of the textbooks, materials, and equipment, and an attestation of the student’s

receipt of the program materials. The school's February 3, 2022, February 6, 2022, and March 1, 2022 responses were forwarded to the Commission for review at the May 2022 Commission meeting.

At the May 2022 Commission meeting, the Commission considered the aforementioned responses. The school's responses provided an explanation pertaining to the complainant's allegations and documentation in response to the Commission's requests for information. In reviewing the submitted documentation regarding the school's assistance to secure an externship site for the complainant, the Commission was concerned with the school's policies and procedures to ensure students secure externships in a timely manner and the school's usage of its leave of absence policy in the interim. The Commission noted that the student's transcript has the enrollment status recorded as leave of absence, the explanation provided, however states: "The school understands the progress [REDACTED] completed her theory courses and is awaiting to attend her externship component" (February 27, 2022 PBAHB response, p. 5), without further explanation of the leave of absence status noted in the transcript or documentation to demonstrate an approved leave of absence was executed. The Commission expressed concern with the extensive time between the student's last date of attendance of September 9, 2021 and the student's current status awaiting an externship site. This left the Commission questioning the school's effectiveness in securing externship sites for its students, the procedure for updating students of this progress, and whether or not the school is continuing to enroll students in programs that require an externship component when such externships are difficult to obtain.

Additionally, although the school noted it "took substantial measures to address the concerns of [REDACTED]" (February 27, 2022 PBAHB response, p. 6), the Commission noted that the school did not provide sufficient documentation showing a resolution with respect to the student's complaint. The response contains email correspondence dated November 2, 2021 between the school administrators noting all the complainant's concerns, but only addressed the externship component in subsequent emails. In addition, the school provided an email dated January 18, 2022 informing the complainant that her concerns will be investigated further, with the complainant's response to the school indicating communication should be addressed to her attorney. The school's response does not provide an explanation of the process and procedure that occurred during the time between these email correspondences to rectify the concerns, an update regarding the status of the investigation, nor an explanation of the complainant's response referring to potential legal action.

The Commission also noted the school did not provide sufficient evidence and explanation that the program materials and equipment are sufficient for the student population or a narrative response demonstrating the program textbook is sufficiently comprehensive and reflects the current occupational knowledge and practice. Specifically, documentation of the textbook notes a publication year of 2018, the Commission required justification that the instructional material reflects the current occupational knowledge, but the school did provide any justification of the textbook. The school also provided external review from the Program Advisory Committee to demonstrate the equipment and materials are sufficient for the number of students in the Hemodialysis Technician program. The Commission noted that the school's acknowledgement that students practice on industry standard equipment was not an acceptable explanation, combined with Program Advisory Committee meeting minutes that the Commission noted did not provide a meaningful review of the school's programs and supporting resources and materials, nor a comprehensive and clear description of the review and commentary made by the school representatives and the Program Advisory Committee members (*Appendix III – Program Requirements, Standards of Accreditation*).

Upon review of the Commission's prior directives and the school's responses, the Commission voted to direct PBAHB to submit additional information in the areas of instructional materials, externships, advertising, faculty qualifications, student complaints, and leaves of absence to demonstrate the school's compliance with accrediting standards to be reviewed at the August 2022 Commission meeting.

August 2022 Meeting Review and Action

At the August 2022 Commission meeting, the Commission reviewed the May 17, 2022 ACCSC letter and PBAHB's response, which led to further questions and concerns regarding PBAHB's operations in the areas of externships, leaves of absence, and facilities.

The Commission had questioned the school's execution of the externship components of its programs. In response to the Commission's request for specific policies and/or procedures regarding a student's inability to secure an externship placement, the PHAHB stated:

In the past, [PBAHB's] practice was to place students on a Leave of Absence when an externship site was unavailable. This was not a formal policy, but an ad hoc attempt to deal with the unusual situation precipitated partly by the Covid-19 pandemic, and short-term inability to send students to clinical externship sites. The institution recognizes that this was an error, and has revised the practice... (July 15, 2022 PBAHB response, p. 6).

Although the school provided the new policy, the Commission questioned whether or not the school implemented the policy because the documentation provided has not been fully executed with a date and signature.

Additionally, in the May 17, 2022 letter the Commission requested the status of enrolling students in the programs that require an externship component. Of the three programs requiring externships, there is no active externship site for the Patient Care Technician program, while the Hemodialysis Technician program continues to have only one active site. The Commission expressed concern that the school is enrolling students in the Patient Care Technician program without having sufficient active externship sites available for enrolled students and without an explanation or timeline of the status of acquiring such externship sites. The Commission also questioned the viability of the externship site for the Hemodialysis Technician program, as well as the school's response for a plan to remain attentive to the three enrolled students who are on a leave of absence given the following response:

Based on the revised curriculum for the Hemodialysis Technician program which requires 40 hours of clinical experience, the one site should be adequate. However, the Clinical Coordinator is in the process of identifying additional hemodialysis sites and the goal is to have a minimum of two sites under contract by the end of July 2022 (Id., p. 8).

The school's response states that the externship site for the Hemodialysis Technician program declined to accept students from PBAHB during the "summer and fall of 2021 due to: a) a change of ownership of the site and b) the Covid-19 pandemic" (Id., p. 8). Based on the school's response, however, it appears that PBAHB failed to follow up with the site or to secure other agreements. The Commission noted the extreme amount of time between the identification of the externship site's declination of students and the continued failure to secure new sites as of the time of the school's response, despite the school's own knowledge of the externship site's reluctance to take on new students. Additionally, the Commission noted that the school's response does not provide sufficient justification or explanation regarding the unsuccessful efforts to attain an additional externship site for this program. Furthermore, the school did not provide an update of the status of the current externship site's willingness to take on new students, and why the three students in this program remain on a leave of absence despite the school's declaration that one site should be adequate.

Furthermore, PBAHB provided an update of the number of currently enrolled students in the Hemodialysis Technician program and the status of each student's externship component. The school stated there are currently three students enrolled in this program, including [REDACTED]

All three students are currently on Leave of Absence. Unfortunately, the institution has been remiss in seeking clinical sites for these students... These students (██████████) all completed the didactic portion of the Hemodialysis program in the summer of 2021. Admittedly, the institution did not follow up with obtaining clinical sites, once the students were on LOA (Id., p. 7).

The Commission expressed serious concerns regarding the excessive amount of time these students remain on a leave of absence. As noted in the *Standards of Accreditation*, a leave of absence period may not exceed 180 days within any 12-month period and each leave of absence is to be properly requested by the student (*Section VII (A)(3)(c)(ii) Substantive Standards, Standards of Accreditation*). Placing a student on a leave of absence while awaiting an externship placement is not an acceptable practice. The school provided its leave of absence policy to reflect the above standard but noted, "...since the practice of placing students who did not have access to an externship site on [leave of absence] status was done on an ad-hoc basis, it is not part of the institution's [leave of absence] policy" (*Id.*, p. 8). The Commission's reaction, however, is that the school has violated its own LOA policy and accreditation standards on a continuous basis. The school stated in its response that ██████████ declined communication requests with the institution, and that the school "did not execute a [leave of absence] request, and the institution did not send ██████████ a [leave of absence] form to execute" (*Id.*, pgs. 8-9).

The school stated, "██████████ and two other Hemodialysis Program students are on [leave of absence] awaiting an opportunity to participate in clinical rotations to complete their program," that "[e]ach of these students completed the didactic portion of their programs in the summer of 2021" and that ██████████ also expressed her reluctance to participate in an externship without additional remedial training" (*Id.*, p. 9). The school provided conflicting and incomplete information regarding ongoing communication with the complainant. The school previously stated the complainant has declined communication with the school, yet she appears to have requested remedial training and the school has failed to provide further explanation of the complainant's reference to involve an attorney in this situation. Overall, the school's response raised serious questions regarding the school's execution of the leave of absence, withdrawal, and termination policies and procedures.

Additionally, the Commission expressed concerns regarding the school's physical facilities and required detailed clarification of the school's ongoing modality of delivery of education to the current student population. In response, the school stated:

As you may be aware, [PBAHB] is waiting to take occupancy of a new location. Owing to health concerns, the current campus is not suitable for student use. The institution anticipates that occupancy will commence August 15, 2022. Therefore, assuming that a certificate of occupancy is provided by Palm Beach County, we propose to invite ██████████ the other two students to begin their capstone course on or about August 22, 2022 (Id., p. 10).

Accrediting standards state that a school must apply to the Commission at least 60 days prior to its intended move date (*Section IV (E)(4)(c)(i) Rules of Process and Procedure, Standards of Accreditation*). The Commission had not received the school's Change of Location-Part I Application, despite the school's statement that it will begin occupancy on August 15, 2022.

The Commission is in receipt of the school's notification dated December 30, 2021 indicating that the safety of the building where classroom instruction is located was compromised and required repairs and maintenance. While the school awaited repairs it requested "distance learning until the building condition is completely remedied by the property owner, or a suitable substitute location is found..." (December 30, 2021 PBAHB notification, p. 1). At the time of the notification the school had approval for the hybrid distance education modality. The school had not requested an expansion of distance education to change the modality of the program delivery to fully online. Thus, the Commission questioned the suitability of the learning environment, in addition to the safety standards required by appropriate regulatory authorities

(Section (I)(G)(1)&(2) *Substantive Standards, Standards of Accreditation*), due to the school's own admission that the facility is not suitable for student use. Additionally, the Commission required clarification regarding the school's delivery of education in the classroom, and whether the school delivered education fully online without approval.

Overall, PBAHB's response demonstrated to the Commission the school's inability to appropriately secure externship sites for the Hemodialysis Technician and Patient Care Technician programs and raised concerns that the school continued to enroll students in a program with no or an insufficient number of active externship sites. Additionally, the school's practice of placing students on a leave of absence due to the lack of available of externship sites, coupled with the continued leave of absence status for the three students in the Hemodialysis Technician program, called into question the school's ability to maintain the appropriate policies and procedures for programs with an externship component. Finally, the Commission required a detailed explanation of the suitability of the school's physical facilities and the modality for which the school has been delivering education since December 2021, at the time of the notification of unsafe facility conditions. Given these concerns and questions, the Commission voted to place PBAHB on Warning with a subsequent review at the Commission's November 2022 meeting.

November 2022 Meeting Review and Action

At the November 2022 Commission meeting, the Commission reviewed the August 29, 2022 ACCSC Warning Order and September 30, 2022 PBAHB's response. The school's response further compounded concerns regarding PBAHB's operations in the areas of externships, leaves of absence, and facilities resulting in escalated concerns regarding the school's adequate management and administrative capacity, to include appropriate administrative and operational policies and procedures to which the school adheres, reviews, and updates as needed (*Section I (A)(1)(d) Substantive Standards, Standards of Accreditation*).

The Commission had previously expressed concerns regarding the school's inability to secure externships for students enrolled in programs that require the completion of an externship component. In response to the Commission's request for documentation demonstrating the school's active externship sites for the applicable programs and policy revisions, the school provided a list of externship sites for two of the school's three programs with externship components. The response indicates that the same externship site, *Sunshine Dialysis*, continues to be the only active externship site for the Hemodialysis Technician program, with a pending agreement still yet to be secured. The Commission again, questioned the school's policies and procedures for securing externship sites and the school's continued failure to secure an additional site as of the date of the school's response. Additionally, the Commission expressed concern regarding the school's management and administrative capacity to place students in externships as two of the three remaining students in the Hemodialysis Technician program have not been placed in an externship, despite the school's acknowledgement of an active agreement that has been in place since March 2021, as noted in the charts on page 17 of PBAHB September 30, 2022 response and page 8 of PBAHB July 14, 2022 response. The school's September 30, 2022 response continues to omit a justification for or explanation of the school's inability to place the two remaining students in the active externship site or the site's willingness to accept students for an externship. These issues lead the Commission to question the school's policies for ensuring acceptable agreements and sites are actively maintained and monitored.

The Commission noted that the school's *Policy and Procedures for Clinical Externship Agreements* describes the procedure for renewal of externship site agreements through a mechanism of tracking and a procedure that mirrors that of initially establishing the site agreement. As noted in the school response and the externship agreement documentation, the agreements automatically renew on an annual basis and "[t]he Campus President shall keep records such that it is possible to track the expiration of the Clinical Agreements" (PBAHB September 30, 2022, p. 87). The active externship site chart noted on page 17 of PBAHB's September 30, 2022 response indicates that there is no contract expiration date for the sites unless

cancelled. The school's notation that there is no expiration date for the agreements contradicts the policy's statement that there are records of the agreement's expiration dates. As such, the Commission requires clarification of the school's procedure and documentation demonstrating the renewed agreements have been completed to ensure the updated annual renewal of the five externship sites noted in the chart on page 17 of the September 30, 2022 response.

The Commission further questioned the status of the school's Patient Care Technician program regarding required updates. In the school's previous July 14, 2022 response, page 7, *Table 1: Summary of Programs with Externship Components* notes that there are "Externship Sites Available" for the Patient Care Technician program, yet none had been secured at the time of the school's response to the Commission's Warning Order. Additionally, in the July 14, 2022 response regarding an update on the enrollment of students into this program, the school stated, "[t]he institution is currently enrolling students for the Medical Assisting and Patient Care Technician [programs]" (PBAHB July 14, 2022 response, p. 16). Due to the Commission's escalated concerns regarding programs with externship components, the Commission required updates in enrollments and secured externship sites in the August 29, 2022 Warning Order; the school provided neither externship site agreements nor updates regarding the efforts to attain sites for this program as a result. Additionally, the school stated "[t]he institution has made no changes in its enrollment procedures for programs with clinical externships (PBAHB September 30, 2022 response, p. 18). Without any clarifying information, the Commission questioned whether the school should continue to enroll students in a program that has no active externship sites, continuing the pattern established by the Commission's original Warning action.

The Commission's concerns continue to escalate regarding the two students who remain in the Hemodialysis Technician program without externship placements, pending or otherwise, as of the date of the school's September 30, 2022 response to the Warning Order. The school stated that it has created a 40-hour remedial training course for these students and have discussed scheduling the course with the students. The school's response, however, lacks a detailed explanation of the student's enrollment status at the time of the response (as those students wait to begin this training at an undetermined time) and a detailed plan for securing an externship site following the completion of the remedial training. The Commission noted that these two students have remained in the program while the school concurrently retains an active externship agreement, yet the school has not been able to place the students at the site. This despite the school's *Policy on Clinical Externship Sites* which states, "[t]he institute shall maintain a sufficient number of externship sites to accommodate student needs and ensure that a site is available for each student without delaying student academic progress" (PBAHB September 30, 2022 response, p. 86). The school has not only previously violated its Leave of Absence policy by placing these students on Leaves of Absences that extended in excess of 180 days but continues to violate its *Policy on Clinical Externship Sites* in delaying the students' academic progress by failing to finalize the conclusion of the students' educational requirements as evidenced by the lack of documentation to demonstrate an established schedule of remedial training and plan to ensure these students are placed in externship sites as soon as possible.

Finally, the Commission found that the school's response has continued to raise serious concerns regarding the school's operation and delivery method of education since December 1, 2021. The Commission approved the school's Change of Location – Part I application on September 29, 2022, in which the school noted the *Scheduled Last Date in Current Location* of June 2, 2022 with a *Scheduled Date Classes Resume in New Location* of October 1, 2022. The Commission noted this is a period of almost four months that the school did not have a physical facility that was approved for instruction. PBAHB has approved programs with lengths of less than four months, leading the Commission to question the school's operation during this period of transition between facilities and as previously noted, PBAHB is approved only for a hybrid distance education delivery method. The Commission required a detailed explanation of the school's

delivery of education during this period of transition and how the education was delivered to all programs. The school's response stated:

From December 1, 2021, to present, online instruction was supplemented with hands-on, in-person training. This instruction occurred in a variety of ways. Initially and for a short time the campus was open several hours per day to provide students an opportunity to practice skills related to cosmetology, barber, skin care, and massage therapy. Students were able to come to campus to pick up supplies and kit for their programs. For the most part, the hands-on portion of the training was conducted via field trips. Student field trips were organized to a local massage and beauty facility which is owned and operated by a PBAHB faculty member adjacent to the campus. Students were afforded an opportunity to practice massage, skin care, cosmetology, and barber services at this facility, under faculty supervision (PBAHB September 30, 2022 response, p. 19-20).

The Commission questioned the school's actions in allowing hands-on training for these programs to be conducted at facilities that are not ACCSC approved facilities and requires a detailed explanation of PBAHB's policies and procedures for providing education outside the approved location, and a detailed explanation of the regulatory agencies requirements for completing hands-on training at unapproved facilities. Additionally, the Commission requires an explanation of regulatory agencies requirements regarding hands-on training with equipment kits that students have removed from the facility.

In the Commission's estimation, PBAHB's response demonstrates the school's inability to secure viable externship sites for programs that have externship components, evidenced by the ongoing delay in the academic progress of the two remaining students in the Hemodialysis Technician program. The extended period of time these two students were on a leave of absence status, then removed, and are now continuing to wait contributes to the Commission's concerns regarding the school's ability to adhere to its own operational policies and procedures. Additionally, the school's response raises serious concerns of the school's delivery of education since December 1, 2021 in unapproved facilities as noted by the school's own admission that it continues to practice hands-on training in facilities outside the ACCSC-approved location. The culmination of unresolved questions and concerns and the continued revelation of additional concerns and questionable practices in PBAHB's response combined with the school's previously demonstrated inability to apply for a Change of Location-Part I Application, raises questions of the school's management and administrative capacity.

Based on the foregoing, the Commission voted to continue PBAHB on Warning, and directs PBAHB to submit the following:

- a. An update on the resolution of [REDACTED] on-going complaint, to include any updates on [REDACTED] tuition refund, any ongoing correspondence with [REDACTED] any legal actions brought by [REDACTED], or any other regulatory action pertaining to [REDACTED] complaint;
- b. A copy of [REDACTED] executed withdrawal documentation;
- c. An update of the educational status of the two remaining students in the Hemodialysis Technician program;
- d. A detailed explanation and timeline of when the students will complete the remedial training and subsequently be placed in externships;
- e. A copy of correspondence with the two students, demonstrating their acceptance of remedial training schedule;
- f. An update of all externship sites for all programs with applicable documentation;
- g. Demonstration of the sites' willingness and ability to take extern students from the school;

- h. An explanation of how the 40-hour remedial training is sufficient for the students in the Hemodialysis Technician program to be prepared for the externship placement and employment;
- i. A chart identifying all students waiting for externships and their corresponding transcripts;
- j. A copy of the renewal documentation for the externship sites, and the mechanism the school uses to track the renewal of externship site agreements;
- k. An update regarding the Patient Care Technician program, to include enrollment numbers and the progress of securing externship sites;
- l. An explanation of the student population and the enrolled programs;
- m. A description of the programs that operated between June 2, 2022 and October 1, 2022; to include the program, the number of enrollments, and a description of the format used to deliver the education (e.g. fully online, blended, residential);
- n. A copy of the school's policies and procedures for operating programs outside of the school's main facility;
- o. An explanation of regulatory agencies policies regarding operating programs outside of an approved location, and the use of equipment outside of the facility;
- p. An update on the current operational status of the school's facility following the approved Change of Location-Part I; and
- q. Any other documentation deemed appropriate by the school to demonstrate compliance with accrediting standards pertaining to this matter.

Warning Restrictions

Pursuant to *Section VII (K)(8), Rules of Process and Procedure, Standards of Accreditation*, the Commission will not consider substantive changes, a change of location/relocation, or additions (i.e., separate facilities, new programs) to a school or its separate facilities while the school is under a Warning.

Notification to Students

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

Response Requirements

By applying for accreditation, a school accepts the obligation to demonstrate continuous compliance with the *Standards of Accreditation*. While the Commission employs its own methods to determine a school's compliance with accrediting standards, the burden rests with the school to establish that it is meeting the standards. The Commission's deliberations and decisions are made on the basis of the written record and thus a school must supply the Commission with complete documentation of the school's compliance with accrediting standards. If the school fails to alleviate the Commission's concerns as expressed herein, the Commission may take an action allowable under *Section VII, Rules of Process and Procedure, Standards of Accreditation*, including continuing the Warning, Probation, or withdrawal of the school's accreditation.

PBAHB 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.

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

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

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 January 5, 2023**. If a response, the required fee,² and the certificate of attesting to the accuracy of the information is not received in the Commission's office **on or before January 5, 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].

Sincerely,

[REDACTED]

Michale S. McComis, Ed.D.
Executive Director

c: Florida Commission for Independent Education
[REDACTED]

Florida Barber/Cosmetology Board
[REDACTED]
[REDACTED]

Encl.: ACCSC Reporting Enclosure
ACCSC Institutional Response Cover Sheet

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 when formulating its response to this letter. More information is available in the [Resources section](#) at www.accsc.org.

² ACCSC assesses a \$500 processing fee to a school placed on Warning.

ACCREDITING COMMISSION OF CAREER SCHOOLS AND COLLEGES
REPORTING ENCLOSURE

PALM BEACH ACADEMY OF HEALTH & BEAUTY (SCHOOL #M070645)
LAKE PARK, FLORIDA

NOVEMBER 16, 2022

At the November 2022 meeting, the Accrediting Commission of Career Schools and Colleges (“ACCSC” of “the Commission”) considered the Admissions Report submitted by Palm Beach Academy of Health & Beauty (“PBAHB”) located in Lake Park, Florida. Upon review of the Commission’s May 13, 2022 letter and the school’s August 23, 2022 report, the Commission voted to **continue PBAHB on Admissions Reporting** in order to provide PBAHB with an additional opportunity to demonstrate compliance with accrediting standards. The reasons for the commission’s decision and the Commission’s requirements for PBAHB to demonstrate compliance are set forth below.

PBAHB must submit a report on the school’s continued efforts to secure documentation to demonstrate that each applicant meets all admission requirements prior to enrollment (*Section V(A)(4)(b), Substantive Standards, Standards of Accreditation*). In response to the May 13, 2022 Commission letter, the school provided admissions policies and procedures with explanations of revisions to the policies, a revised roster of students that was provided in the school’s response for review at the May 2022 meeting and accompanying documentation to support the school’s decision to admit those students. The Commission continued to find discrepancies in the documentation provided for the roster of enrolled students between the period of October 1, 2021 through January 1, 2022. The Commission noted several dates in the roster that did not match the supporting documentation. Additionally, there was no supporting documentation provided to show “proof that [the student is] a U.S. Citizen, Permanent Resident or on a legal status allowing [the student] to study in the United States” (*PBAHB March 18, 2022 response, p. 6*). Furthermore, the documentation included several instances of omitted or contradictory information, for example, the student Enrollment Agreement on page 96 of PBAHB’s August 23, 2022 response included an incomplete date of birth. Additionally, the student Enrollment Agreement on page 251 of PBAHB’s August 23, 2022 response does not contain the *Authorized School Personnel* signature. Finally, the school provided a revised *Admissions Policy and Requirements (Eligible Career Pathways Program)* and documentation of student Wonderlic test scores but did not provide documentation of student’s concurrent enrollment in an adult secondary education program while attending PBAHB. The Commission requested clarification and documentation to demonstrate the school’s execution of this policy, but again, the school did not provide the requested documentation.

The Commission requested a revised roster of the same students and executed enrollment agreements from the school’s March 15, 2022 response to ensure accuracy and consistent documentation to support the admissions decision. Additionally, the Commission has consistently requested clarification and documentation to demonstrate the execution of school’s policies and procedures, specifically the Eligible Career Pathways Program (Ability to Benefit) policy. The preceding two responses to the Commission’s requests have lacked complete documentation to demonstrate to the Commission that the school is implementing the revised admissions policies and procedures; the Commission questions the school’s compliance with its admissions policies and procedures. Based on the foregoing, the Commission voted to continue the school on admissions reporting and requires the school to provide the following.

- a. A complete copy of the school’s admissions policies and procedures, as stated in the school’s catalog;

- b. An explanation of the revisions noted to the admissions policies and procedures, if applicable;
- c. The ten most recent enrollments following the school’s policy revisions, as follows:

Student Name	Program	Student Start Date (Class Attendance)	Date All Admissions Documentation Secured	Date Enrollment Agreement was finalized and provided to student

- d. For the students captured in the chart in (c.) above, a copy of all documentation supporting the decision to admit the students in alignment with the school’s admission requirements (e.g., proof of high school graduation or its equivalency; a translation of the documents and the credential evaluation report for foreign credentials; scored entrance exams; background checks, as applicable; and signed Enrollment Agreements, etc.); and
- e. Any additional information or documentation that the school believe will be useful to demonstrate the school’s compliance with ACCSC’s admission requirements.

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.

PBAHB must provide a response to this reporting requirement that provides the information requested along with any additional information that the school believes supports a demonstration of compliance with accrediting standards.³ 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.

PBAHB 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 January 5, 2023** along with the **\$250 reporting**

³ 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.

processing fee.⁴ 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 January 5, 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]

■ [REDACTED] *Appendix I – Accreditation Fees, Substantive Standards, Standards of Accreditation.*



Accrediting Commission of Career Schools and Colleges

2101 Wilson Boulevard, Suite 302
Arlington, Virginia 22201
703.247.4212
703.247.4533 fax
www.accsc.org

INSTITUTIONAL REVIEW COVER SHEET

Submit as a cover page for responses

NAME OF SCHOOL: _____

SCHOOL NUMBER: _____

ADDRESS: _____

CITY: _____

STATE: _____

ZIP CODE: _____

PHONE NUMBER: _____

EMAIL ADDRESS: _____

The data submitted are certified correct to the best of my knowledge and belief.

CONTACT NAME: _____

TITLE: _____

PHONE NUMBER: _____

EMAIL ADDRESS: _____

SIGNATURE: _____

DATE: _____

The information provided is for the following response type:

- | | | |
|--|---|--|
| <input type="checkbox"/> ANNUAL REPORT | <input type="checkbox"/> AGENCY NOTICE | <input type="checkbox"/> COHORT DEFAULT RATE |
| <input type="checkbox"/> PROGRESS REPORTING | <input type="checkbox"/> COMPLAINT | <input type="checkbox"/> EMPLOYMENT VERIFICATION |
| <input type="checkbox"/> FINANCIAL REPORTING | <input type="checkbox"/> SIGNIFICANT GROWTH | <input type="checkbox"/> OTHER: _____ |

*** If the submission is for more than one affiliated institution, please ensure that the submission is uploaded for EACH applicable institution.**

NO FEE ASSESSED

FEE ASSESSED

FEE TYPE: _____

SENT DATE: _____

CHECK NO.: _____